



STIFTELSEN för
STRATEGISK FORSKNING

The Foundation's policy regarding conflicts of interest

A conflict of interest (COI) is a situation that gives reason to doubt a person's impartiality. A COI policy is intended to guarantee objectivity and impartiality in selection, presentation and decision procedures and to instil confidence in all parties regarding such objectivity.

Provisions governing COI for public authorities are set forth in *Förvaltningslagen* (Administrative Procedure Act), SFS 1986:223. The Foundation voluntarily applies the provisions in the same way as state research-funding bodies. SSF's Governing Board can authorize exceptions from this policy if extraordinary reasons exist. A prime example of such extraordinary reasons is the need for specialist expertise in the handling of the matter. A record shall be kept of all such decisions, in the same way as disclosure of COI.

The COI policy is aimed at "persons charged with handling a matter". Such persons include those involved in selection and presentation as well as those who decide, whether they are members of a board, a selection group or other administrators or officials, in other words anyone who can influence the outcome of a matter.

Different types of conflicts of interest

Conflicts of interest involving private interests, personal involvement or family ties disqualify the person handling the matter

- if the matter concerns the person himself/herself or his spouse, parent, child, sibling or other closely related person,
- if the person or someone closely related to him/her can expect extraordinary advantage or detriment from the outcome of the matter.

Conflicts of interest involving legal representation disqualify the person assigned to handle a matter

- if the person or someone closely related to him/her is the legal representative of someone that the matter concerns,
- if the person or someone closely related to him/her is the legal representative of someone who can expect extraordinary advantage or detriment from the outcome of the matter.

Conflicts of interest involving organizational roles can arise in connection with oversight matters. A possible example in the Foundation would be if the chairman of a Foundation programme were to be appointed as a member of the

Governing Board of the Foundation and the Board were to decide on a matter of importance for the programme in question.

Conflicts of interest involving proxies or agents disqualify the person assigned to handle a matter

- if the person has served someone as a proxy or has assisted that person for payment as regards the material issue.

Conflicts of interest involving sensitive situations disqualify the person assigned to handle a matter

- if there is some other special circumstance that is likely to undermine confidence in his/her impartiality in the matter that is not covered by the aforementioned COI categories.

Examples of conflicts of interest involving special circumstances are:

- close collaboration in a professional context,
- obvious friendship or enmity,
- relationship of economic dependency,
- superior/subordinate relationship,
- someone involved in the matter in a way that may arouse doubts as to their ability to render an impartial judgement.

Managing conflicts of interest

It is up to the chairman of the board, the selection group or the equivalent to make sure that COI are managed properly, when necessary with the assistance of collaborating officials. In questionable cases, the administrative director of the Foundation should be contacted. It is the obligation of board members and other persons charged with handling a matter to spontaneously furnish information regarding possible grounds for COI. The working group decides how to apply the COI policy in each individual case. In doubtful cases the person should be disqualified.

COI shall be aired the first time a new group meets or a new member is added. The possible existence of a COI shall be noted in the minutes each time the question is brought up, **even if** the working group arrives at the conclusion that there is no COI. At meetings when minutes are not normally kept, any COI situations shall nevertheless be recorded.

A person disqualified for COI may not be present when an application or the equivalent is discussed or decided on. The rule is that the disqualified person should leave the room while the matter is being dealt with. Depending on the context, a person may be discharged from all or parts of the assessment process in which his/her own application is being considered.

External reviewers, evaluators etc.

External experts, both Swedish and international, shall be queried about possible COI when applications or mid-term and final evaluation reports are ready to be reviewed/evaluated. The reviewer shall actively declare

himself/herself impartial by "ticking a box" in the electronic system and, if necessary, also describing what type of relationship he/she has or has had with the applicant or applicants in question.

Regarding outside activities

An employee or contractor may not have employment or assignments or otherwise perform activities that might undermine confidence in his/her or any other employee's impartiality or otherwise harm the Foundation's reputation.

In accordance with the rules for outside activities established by the Governing Board, board members and secretariat employees must at the end of each year openly disclose any outside positions such as board member, adviser or committee member and any assignment in another organization whose activities impinge or may impinge upon the Foundation's activities. This information shall be updated continuously. A compilation of disclosures by the members of the Governing Board will be included in the Foundation's Annual Report, which is also posted on SSF's website.