

## Factsheet for members of evaluation bodies

# Conflicts of Interest (COI)



Ensuring an impartial and quality-driven evaluation of each grant application is the SNSF's main mission and independence is key to the SNSF's reputation. At the same time, the SNSF was set up to enable selfgovernance, with active scientists as evaluators of other scientists. Despite the tension between independence and the interconnected nature of research, it is possible to handle COI pursuant to the legal requirements. The present factsheet provides guidance on this

### Why does the SNSF have special obligations regarding COI-handling?

The SNSF accomplishes a federal task using federal funds. Each grant applicant is entitled to an impartial procedure as guaranteed by art. 29 of the Federal Constitution and art. 10 of the Federal Administrative Procedure Act (APA).

### What is a COI?

Legally, a COI is essentially defined as an «*objective appearance of partiality*». This appearance exists *if an external observer would have reasonable grounds to think that an evaluation body member might not be impartial*. This also encompasses potential partiality.

It is not relevant,  
... whether the concerned person is really subject to partiality,  
... whether the COI alters the person's behavior,  
... whether the COI has an impact on the outcome of the grant evaluation.



### Did you know?

«COI have nothing to do with (fair or unfair) intentions. They are about circumstances which are incompatible with evaluating specific grants»

### What should you do concretely in case of COI?

- Always ask yourself whether an external observer could reasonably perceive you as lacking impartiality regarding an application.
- Disclose your COI spontaneously, without being asked.
- Help other members to remember their COI duties in case they forget.
- A person with COI must recuse him / herself, i.e. be excluded from the whole evaluation process:
  - He / she does *not participate in or listen to discussions* regarding the concerned application.
  - He / she does *not access any files* related to the concerned application

### Who is concerned by obligations in case of COI?

All persons who participate at any stage in the grant evaluation procedure are subject to the same recusal obligations in case of COI. Consequently, these obligations apply equally to evaluation body members (including advising or observing members), external reviewers and SNSF staff.

### Possible COI types and practical examples

#### Close familial or personal relationship

with an applicant / project team member e.g. close personal friendship, special personal enmity, close relatives, marriage, cohabitation.

#### You can safely assume to remain impartial

if (*non-exhaustive* examples):

- You have occasionally met one of the team members at scientific conferences.
- You did your undergraduate studies at the same faculty as a team member.
- You are interested in the work of a team member and read all his / her publications.

#### You cannot assume to be impartial

if (*non-exhaustive* examples):

- You are an uncle / aunt of a team member.
- You are an in-law of a team member.
- There is a close and / or long-lasting friendship between you and a team member.



«Extra strict evaluation *cannot compensate a COI*»

«*Not everything is a COI. The examples below provide an understanding of the intensity / closeness of relationship or interest required to lead to an objective appearance of partiality.*»

### Current, recent (past 5 years) or planned professional, scientific or institutional collaboration

with an applicant / project team member, e.g.:

- acting as co-applicant or project partner in a collaboration (paid or unpaid),
- working in a closely associated organisational unit,
- publishing jointly (field specifics should be taken into account).

### Same institution

The decisive factor is the size and structure of the institution and organisational units and thus whether you have sufficient distance from the team members.

#### You can safely assume to remain impartial

if (*non-exhaustive* examples):

- You work at the same institution but are not in contact with a team member (e.g. no common tasks,).
- You have not worked at the same institution in the past 5 years.

#### You cannot assume to be impartial

if (*non-exhaustive* examples):

- You work at the same institution and are involved in common tasks.
- You are regularly interacting with a team member.

### Special examples applicable to the Careers Division regarding same institution

#### You cannot assume to be impartial

if (*non-exhaustive* examples):

- You are active at the proposed host institute / department (where the applicant is going).
- You are active at a current institute/department (where the applicant was located in the past or is now)
- AND have / had regular contact with the applicant.

### Joint publications

#### You can safely assume to remain impartial

if (*non-exhaustive* examples):

- Common publication with a team member, but in loose collaboration
- (e.g. many co-authors, no meetings, only a few e-mail exchanges)



#### You cannot assume to be impartial

if (*non-exhaustive* examples):

- Common publication with a team member in close collaboration
- (e.g. few co-authors, regular meetings) in the past 5 years



### Direct competition with a team member and/or the project

I.e. you could have a vested interest in the outcome of the grant, or you could directly benefit from the research ideas.

#### You can safely assume to remain impartial

if (*non-exhaustive* examples):

- You are working in the same field as a team member.
- Your work used to focus on a very similar topic in the past,
- but your research interests have changed since then.

#### You cannot assume to be impartial

if (*non-exhaustive* examples):

- Your own career will likely be influenced by the outcome of the project.
- You are preparing a proposal or implementing a project on the same research topic.



«Also *indirect* COI are relevant, e.g. a close relative of yours is in direct competition with an applicant.»

### You hold any other vested interest (e.g. financial interests)

in the specific research project or there are any other reasons for an outside observer to reasonably suspect partiality.

#### You cannot assume to be impartial

if (*non-exhaustive* examples):

- You could benefit from or be disadvantaged by the outcome of the project.
- You advised the applicant(s) to file the given application.
- You are in a financial / commercial relationship (e.g. consultancy, ownership of shares or patents / copyrights / royalties; employment) that can give rise to the perception of partiality.
- You are a member of an interest group whose central concern is promoted or criticized by the proposed project (e.g. if you were asked to review a project about end of life measures but are a member of an association against euthanasia).
- You have any other reason that may fundamentally put an impartial evaluation into question.



«A COI can arise if several elements which considered individually would not constitute a COI occur *cumulatively* in the same case.»

You can read more on COI in the SNSF COI Guidelines.