

Approved by SC on 12 December 2014

# DRYLAND SYSTEMS (CRP-DS) CONFLICT OF INTERESTS POLICY

Food security and better livelihoods for rural dryland communities

# 1. Purpose

- 1.1. Full disclosure followed by aggressive monitoring and conflict management is the key to preventing and resolving conflict situations. Full disclosure of relevant information and the establishment of a public record are in the best interest of both the institution and the member of staff and consultants. It demonstrates good faith on the part of the employee and protects his or her reputation and that of CRP-DS.
- 1.2. Disclosure will not necessarily restrict or preclude an employee's or consultant's activities. In fact, activities that may at first appear impermissible may be deemed permissible when all facts regarding the activity are examined.
- 1.3. Upon appointment all staff or contracted consultants will be asked to complete a Conflict of Interest Form and the Human Resources Department (HRD) of his/her CRP-DS CGIAR Partner Center (PC) should send it to the CRP-DS IP & Legal Manager who on the basis of the information provided will maintain a register and create a written annual report to be presented to the Research Management Committee ("RMC"). Staff and contracted consultants shall inform the CRP-DS IP & Legal Manager of any changes in their circumstances throughout the year and the register will be updated accordingly.
- 1.4. As an additional source of help the Conflict of Interest Policy contains in Annex 1 a list of questions that may be used to elucidate the nature and potential seriousness of a conflict of interest. If for any reason the person(s) in charge with adjudicating on a conflict of interest feels s/he is not able to take a decision, then s/he must refer to his or her line manager.

#### 2. Scope

This Policy applies to all staff members that CRP-DS employs and it extends to consultants, Project Management Office ("PMO") staff, and all other staff employed or contracted within CRP-DS collaborators, including all other PCs and related third parties.

## 3. Definition

- 3.1. A conflict of interest is a conflict between the official responsibilities of a person in a position of trust and any other interests the particular individual may have, where the individual could be seen to be influencing the project matters for actual or potential personal benefit.
- 3.2. A conflict of interest arises when an employee's personal, social, financial or political activities interfere, or potentially interfere, with his or her obligations to CRP-DS.
- 3.3. A conflict of interest exists when an employee or member of his or her immediate family, accepts gifts, payments, entertainment, services, loans, or promises of future benefits from vendors, governments, or anyone in connection with that employee's activities at CRP-DS. Gifts received in the course of business of a value lower than US\$50 however are not subject to this Policy.
- 3.4. Staff members who have occasion to deal in their official capacity with any matter involving a business concern in which they hold a financial interest shall immediately disclose the measure of that interest to the CRP-DS PMO. The holding of shares in a publicly quoted company shall not constitute a financial interest within the meaning of this rule.

- 3.5. Staff members must not attempt to gain economic profits for themselves, their family or friends when awarding CRP-DS's contracts to commercial firms or in other similar situations.
- 3.6. To enable CRP-DS to safeguard against potential conflicts of interest, the HRD of the Lead Centre, that is ICARDA, and all HRDs in other PCs shall maintain a Register of Interests for all relevant staff and consultants that have been declared. The registries are then submitted to the CRP-DS IP & Legal Manager who maintains an updated report. It is the responsibility of staff and consultants to respond correctly to requests made of them.

# 4. Obligations

- 4.1. Each staff member is expected to perform his/her duties honestly, in good faith and in the best interests of CRP-DS maintaining the highest degree of integrity and avoiding any conflict of interest or appearance of conflict. Appropriate action must be taken at all times taking the suitable steps to avoid any potential conflict of interest. Staff is under a continuing obligation to disclose any potential conflict of interest as soon as it is reasonably known.
- 4.2. Any action or involvement or interest which may be seen to lead to a conflict of interest should be disclosed where requested and acted upon as appropriate.
- 4.3. Failure to disclose potential or actual conflicts of interest could result in disciplinary action.
- 4.4. The CRP-DS Director has the authority to request each PC to replace the CRP- DS funded staff from their position.

#### 5. Process

- 5.1. Employees and consultants are responsible for disclosing potential conflicts of interest, and/or commitment. Reporting mechanisms for disclosure should begin with the individual's Activity Leaders, Flagship Coordinators, and Partner Center Coordinators and through them to the CRP-DS Director and ultimately to the Consortium Office. In cases where an employee or consultant has multiple reporting responsibilities disclosure shall be reported to the primary Research Unit, and other superiors shall be informed of the disclosure in writing. In all cases the disclosure and its outcome shall be noted. Where a real or potential conflict of interest exists this, together with the agreed outcome, shall be notified to the CRP-DS IP & Legal Manager.
- 5.2. Consultants to CRP-DS are also required to divulge any personal or family financial holdings or situations that could create a conflict of interest and/or introduce bias into their professional judgment. Such disclosures should be made to the CRP-DS office contracting for the service, and appropriate determination shall be made on the management of any conflict.
- 5.3. Disclosure in all cases shall include the type of potential conflict (conflict of interest or commitment), the nature of the activity, a description of all parties involved, the potential financial interests and rewards, possible violations of legal requirements, and any other information which the employee or consultant feels necessary to evaluate the disclosure. The Partner Center Coordinator shall advise the Director of CRP-DS of all disclosures.

## 6. Evaluating Disclosures

6.1. Those evaluating disclosures at each level of review need a framework for determining the permissibility of activities and for assessing the degree to which disclosed activities may pose

risk to the staff member, the institution, and other entities that may be affected (Appendix 1). The lists are not exhaustive and other questions related to special circumstances should be added as appropriate.

- 6.2. If it appears that there is genuine cause for concern, the reviewer must ascertain whether appropriate controls are in place to deal with possible conflicts. Questions the reviewer should ask, as relevant, are listed in Appendix 2 to this document.
- 6.3. If the reviewer is uncertain as to the correct way in which to deal with a situation, they should refer the matter to the next level of management or consult the CRP-DS PMO for advice.

#### Annex 1

#### QUESTIONS FOR EVALUATING POTENTIAL CONFLICTS OF INTEREST

- 1. Are you aware of any current or proposed transaction or arrangement between CRP-DS and you or your family member? If so, please describe.
- 2. Are you aware of any other relationship, arrangement, transactions or matters involving CRP-DS which could create a conflict of interest? If so, please describe. Has all relevant information concerning the staff member's activities been acquired (i.e., has there been full disclosure)?
- 3. Do the staff member's relevant financial interests suggest the potential for conflicts or the appearance of conflicts or bias?
- 4. Do the staff member's reported external time commitments exceed permissible levels?
- 5. Is there any indication that the staff member in his or her professional role has improperly favored any outside entity or appears to have incentive to do so?
- 6. Has the staff member inappropriately represented the CRP or Lead Centre to outside entities?
- 7. Does the staff member appear to be subject to incentives that might lead to conflicts or bias?
- 8. Is there any indication that obligations to the CRP are not being met?
- 9. Is the staff member involved in a situation that might raise questions of bias, inappropriate use of CRP assets, or other impropriety?
- 10. Could the staff member's circumstances represent any possible violation of applicable legal requirements?
- 11. Do the current engagements of the staff member represent potential conflicts between outside interests (e.g. working on projects simultaneously for competing business entities)?
- 12. Could the proposed activity withstand public scrutiny?

#### Annex 2

# QUESTIONS RELATING TO THE CONTROL OF A CONFLICT OF INTEREST

- 1. Will the negotiation of relevant research affiliations or other contracts be handled by disinterested representatives of the institution?
- 2. Will the research work plan receive independent peer review prior to its initiation?
- 3. Are there mechanisms in place to prevent the introduction of bias into research projects?
- 4. Will the project be supervised by someone with no conflicting interests?
- 5. Are there means to verify research results (e.g., independent corroboration in another laboratory, expert review)?
- 6. Will data and materials be shared openly with independent researchers? If not, who determines accessibility to such resources?
- 7. Will the product of a collaborative effort with an outside party be published in the peer-reviewed scholarly literature?
- 8. Will the sponsor and/or relevant parties receive acknowledgement in public presentations of the research results

#### Annex 3

#### **Conflict of Interest Form**

CRP-DS requires all employee and consultants engaged in its activities to disclose any conflicts of interest, as outlined in the policy, on an annual basis or as soon as when they arise.

Kindly respond to the following questions to the best of your knowledge:

- 1. Are you aware of any current or proposed transaction or arrangement between CRP-DS and you or your family member? If so, please describe.
- 2. Are you aware of any other relationship, arrangement, transactions or matters involving CRP-DS which could create a conflict of interest? If so, please describe.
- 3. Please list all significant and relevant professional activities that might be considered conflict of interest if it applies to you. These may include employment and/or consulting relationships.
- 4. Please list current, significant, and relevant financial interests that may be viewed as impairing objectivity in carrying out your duties and responsibilities or may create an unfair advantage for you or any person or organization. These may include financial investments, intellectual property and commercial interests and sources of private sector research support.
- 5. Please provide any other relevant information that may affect objectivity or independence to perform in your role as a member of the ISP if it applies to you.

I have received and read CRP-DS's Conflict of Interest Policy. I hereby declare to the best of my knowledge that the information provided is complete and accurate. I understand that this form will be considered confidential and will be reviewed annually or before if my situation changes as stated in the Conflict of Interest Policy.

(Signature)	
(Name)	
(Date)	



The CGIAR Research Program on Dryland Systems aims to improve the lives of 1.6 billion people and mitigate land and resource degradation in 3 billion hectares covering the world's dry areas.

Dryland Systems engages in integrated agricultural systems research to address key socioeconomic and biophysical constraints that affect food security, equitable and sustainable land and natural resource management, and the livelihoods of poor and marginalized dryland communities. The program unifies eight CGIAR Centers and uses unique partnership platforms to bind together scientific research results with the skills and capacities of national agricultural research systems (NARS), advanced research institutes (ARIs), non-governmental and civil society organizations, the private sector, and other actors to test and develop practical innovative solutions for rural dryland communities.

The program is led by the International Center for Agricultural Research in the Dry Areas (ICARDA), a member of the CGIAR Consortium. CGIAR is a global agriculture research partnership for a food secure future.

For more information, please visit

# drylandsystems.cgiar.org

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