

Guidelines for Conflicts of Interest

1.0 Background

The Danish National Research Foundation (DNRF) is governed by Act of Parliament, cf. Consolidated Act no 367 of April 10, 2014. The Act on Public Administration¹ also applies to the activities of the Foundation, including the rules on conflicts of interest (disqualification).

Taking into account that the grants of the Foundation are generally considered to be of considerable importance to both applicants and their host institutions, the Foundation has established the following more explicit and detailed guidelines for the determining and processing of such conflicts of interest that may occur in relation to members of the board and secretariat of the Foundation as well as in relation to external peer reviewers and other external consultants.

The guidelines fully respect the rules of the Act on Public Administration. Also, due regard has been paid to the more detailed rules of Executive Order no 1154 of October 16, 2017, governing the determining of conflicts of interest within the Independent Research Fund Denmark.

For the purpose of the DNRF guidelines a "conflict of interest" should be understood as a situation in which personal, financial or other interests have the potential to compromise or bias professional judgement.

2.0 Purpose and basic principles

The purpose of the guidelines is to ensure that any potential conflict of interest is addressed and handled adequately and in accordance with applicable legislation.

Basically, if a concerned person may be suspected of bias in such a way that there is a well-founded suspicion of partiality, that person has an obligation to withdraw from any involvement in the matter, including not to accept to act as peer reviewer or consultant for the Foundation.

As regards members of the board, it is important not to disqualify members without such well-founded suspicion of partiality as arbitrary decisions of disqualification will reduce the professional knowledge of the board.

The final assessment of a potential conflict of interest is based on general considerations taking the actual circumstances of the specific matter into account.

3.0 Processing and documentation

All persons concerned have an obligation to inform the secretariat of the Foundation of any potential conflict of interest in relation to a specific matter. The secretariat should be informed as soon as possible, i.e. before any steps are taken in the specific matter.

¹ Consolidated Act no. 433 of April 22, 2014 on Public Administration ("Forvaltningsloven")

The secretariat will take the matter further to the board or the CEO, as appropriate.

The final decision on disqualification of members of the board and the CEO is taken by the board of the Foundation, excluding the person in question. Concerning other persons, the decision is taken by the CEO of the Foundation.

All cases shall be assessed individually. No person disqualified in respect of any specific matter will be allowed to decide, to take part in the decision-making or to otherwise assist in the consideration of the matter in question.

The processing and the assessment of conflicts of interest shall be duly reflected in the minutes of the concerned board meeting, if any, and in the archives of the Foundation.

4.0 Situations that may constitute a conflict of interest

The most common situations in which personal, financial or other interest have the potential to compromise or bias professional judgement in the context of the DNRF fall within the following categories:

- Personal, including financial interests
- Interests of close relatives
- Interests of a private unit
- Other circumstances, including
 - Institutional interests
 - Academic interests

The situations are more detailed elaborated in the following:

4.1. Personal, including financial interests

The person concerned has a particular personal or financial interest in the outcome of the case or is currently representing or has previously represented someone in the same case with such an interest.

4.2 Interests of close relatives

The spouse, relative or person-in-law of the person concerned in the direct line of ascent or descent or in the collateral branch as close as nephews and nieces or any other closely related persons (e.g. fiancés) have a special personal or financial interest in the outcome of the case or represent any person with such an interest.

4.3 Interests of a private unit

The person concerned is an employee, a manager or a board member etc. of a private unit in which the applicant is employed, a manager or a board member, etc.

4.4 Other circumstances

Other circumstances exist that are likely to lead to any doubt about such person's impartiality, such as close friendship or enmity (personal or scientific), or institutional or academic interests:

4.4.1 Institutional interests

The person concerned is employed in a public institution, an academic unit etc., the place of employment is applicant, and the case is of particular importance to the place of employment;

The person concerned is a manager or a member of a managing body, academic unit etc., and the institution is applicant;

The person concerned is a manager of a public institution, a faculty, an academic unit etc. at which the applicant is employed, and the applicant is subordinate to (i.e. reports to) the person concerned;

The person concerned is a member of a managing body at a public institution, an academic unit etc. at which the applicant is employed, and the application is of particular importance to the place of employment;

The person concerned is employed in a public institution, an academic unit etc. at which the applicant is a manager (principal, dean, sector manager, institute manager etc.);

The person concerned is employed (but not a leader) in the same public institution, academic unit etc. as the applicant, and the application is of particular importance to the place of employment of the person concerned, or for the person concerned, or a research group in which the person concerned has recently or until recently participated.

4.4.2 Academic interests

The person concerned is or has until recently been a participant in a research group, and a member of the research group is an applicant. However, this is only relevant for continuation of projects in which the person concerned has participated;

The person concerned is or has until recently been collaborating or co-publishing with the applicant. However, the type and seriousness of the collaboration shall determine whether such collaboration is deemed as a disqualifying conflict of interest;

The person concerned is presently, or has accepted to be, or has until recently been counsellor or supervisor for the applicant, or is listed as a guarantor for the applicant;

4.5 Ten applicants or less

A person who is disqualified in respect of an application is also disqualified in respect of other applications when 10 applicants or less compete. If a final decision is made in respect of the application to which the disqualification of the person concerned relates and this application is subsequently removed from further consideration, the person concerned may participate in the assessment of the remaining applications.

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