

Bruegel's Statement on Research Integrity¹

The independence, professional integrity and objectivity of Bruegel's research are among its principal assets. To ensure that all those conducting research at or for Bruegel conform to the highest standards for their public statements and activities, the following policies complete the framework set by Bruegel's statute and bylaws and guide Bruegel in its avoidance of conflicts of interest and other problems.

A potential conflict of interest exists when a Bruegel fellow² has an external economic interest or is involved in external activities to an extent that affects, provides an incentive to affect, or is perceived as affecting research and other activities performed within the framework of Bruegel.

Conflicts of interest can arise naturally from an individual's engagement outside Bruegel, and the mere existence of a conflict of interest does not necessarily imply wrongdoing on anyone's part. However, both actual conflicts and the appearance of them can be harmful to Bruegel and the individual involved.

Conflict of interest situations are often complex and judgments may differ on whether a conflict in fact exists. Disclosure and consultation are the best means for dealing with such situations. Therefore, the goal of a policy of disclosure and consultation is to prevent a fellow from inadvertently placing himself or herself in a position of conflict.

Avoid Partisanship

Fellows have a duty to protect Bruegel's commitment to non-partisanship. In keeping with Bruegel's mission, they may provide analysis and recommendations on matters of public policy on a non-exclusive basis to public officials and candidates for public office; however, if in relation to election campaigns they advise candidates in a fashion that constitutes or connotes support for those candidates, fellows shall make clear they are doing so not in their Bruegel capacity, outside regular business hours and without use of Bruegel facilities. Resident fellows shall refrain from representing or counselling candidates at public events or media appearances. They will request a leave of absence if their political activities interfere with, or take time away from, their Bruegel obligations. Bruegel's Director and senior staff shall exercise particular restraint in these matters.

Avoid Parochialism

Resident fellows shall refrain from any affiliation or assignment with local or home-country public bodies that would meaningfully involve them in the representation of local and national interests at European or international level in areas directly related to their research. Non-resident fellows shall periodically report such affiliations or assignments. Furthermore, in conducting research and presenting research results, all fellows shall be attentive that their legitimate local and home-country ties do not taint their views in a manner which would bias their conclusions. This principle shall not impede the involvement of fellows in dialogue with national authorities.

Avoid Capture by Special Interests

Any arrangement between Bruegel and an organization or government that funds (a) specific research project(s) beyond the payment of a Bruegel membership subscription is considered sponsored research. These arrangements shall not:

- Inhibit free dissemination of results of scholarly activity and research (acceptance and protection of confidential background information shall not be permitted to affect the ability Of investigators to openly publish all the results of sponsored research);

¹ This Statement was endorsed by Bruegel's Board on 3 May 2006. Bruegel welcomes comments on it and questions on the implementation of the policies it lists. For comments and questions, please contact Bruegel's Director or Chief Development Officer, whose contact data can be found on Bruegel's website. Bruegel is grateful to the Brookings Institution for sharing their insights on the processes described in this Statement.

² In this document and unless otherwise indicated, "Fellows" refers to Bruegel's resident fellows (whether their relationship is governed by a full- or part-time employment contract or by a service agreement), as well as non-resident fellows or any scholars hosted by Bruegel in the context of their work with Bruegel.

- Stipulate any predetermined result or policy stance, either personally or institutionally.

Any questions about the propriety of restrictions or parameters placed on sponsored research by corporate, foundation or government sponsors shall be referred by fellows to the Director.

In dealing with Bruegel's Members, fellows shall remember the statutory provision that "Members shall not try to influence the results of research carried out at [Bruegel] or obstruct to its dissemination" (Article 3 of Bruegel's Statute). They shall report any such attempt to the Director.

A conflict of interest may exist if a fellow (or a close relative or spouse or partner of his or hers) owns significant stock or equity in a commercial enterprise or draws significant revenue from it³ and that fellow's research or other professional duties for Bruegel are meaningfully related to the activity of the enterprise. Any such case shall be referred to the Director. It is generally not permissible for Bruegel to receive project-specific funding from the commercial enterprise in which a fellow has a financial interest, for research conducted by that fellow for Bruegel (no self-dealing).

Staff members who enter into external consulting or other agreements shall take care that these are not in conflict with their obligations under any sponsored grant or contract, or any other Bruegel policies.

For non-research staff, it may be appropriate to avoid being part in Bruegel financial decisions involving the external commercial enterprise in which the employee (or a close relative or live-in partner of his or hers) has a financial interest.

Manage Outside Commitment

Simultaneous affiliations with outside organisations shall conform to the following conditions:

- Outside employment, consulting, and other interests shall not negatively impact a fellow's commitment to the work of Bruegel.
- Resident fellows shall not engage in outside activities that directly compete with the core mission of Bruegel or are likely to be in conflict with their Bruegel responsibilities, regardless of the time they require, unless approved by the Director, who may in specific cases refer to the Board. This provision shall also include appointments to local, national or international bodies, including unpaid consultative bodies.

A fellow who holds a position with an external organisation shall ensure that the corresponding obligations are compatible with the policies of Bruegel, and shall explicitly notify these policies to the external organisation when appropriate. Furthermore, when publishing, testifying or otherwise communicating outside of Bruegel, fellows shall exercise judgement and indicate when appropriate to the intended audience that the views expressed are his or hers and do not necessarily reflect those of other fellows of Bruegel.

Disclosure

To monitor for conflicts of interest and provide guidance with regard to specific activities, Bruegel requires scholars and officers to formally agree to be bound by this Statement at the time when they join, and to file an annual declaration of their outside interests and potential conflicts to management. In case of doubt, fellows shall always consult with the Director. The Director and Deputy Director shall similarly report outside interests and potential conflicts to the Chairperson of the Board.

Bruegel management, fellows and senior staff disclose all material outside interests in their short biography posted on the website. In case of financial interests, Bruegel management, resident fellows and senior staff indicate whether they are (a) not paid, (b) paid or (c) significantly paid. Significant pay, as approved by the Board, is defined as 2500 euro. Fellows shall also exercise judgment in mentioning relevant outside interests in their publications and external communications.

This Statement is to be posted on Bruegel's public website.

³ Significant financial interest can be defined as €5,000 in annual revenue or income, or 5% of equity ownership. However, especially in connection with equity, the appearance of conflict could arise even at a lower figure;

