



## **Center for Global Development and CGD Europe Policy on Research Independence**

### **1. Purpose**

This document asserts that research conducted by employees or other affiliates of the Center for Global Development (CGD) or CGD Europe (CGDE)—henceforth referred to jointly as CGD/E—is independent. It provides guidance on exactly what that independence means: in short, that the results of CGD/E research will not be influenced by funders or other parties or influences outside of the expertise of the researchers themselves. It complements and builds on the CGD Organizational Policies and Terms (see Annex A of this document), the CGD Conflict of Interest Policy (Annex B), the CGD Policy for Government Outreach (Annex C), and the CGD Policy on Funding Independence.

### **2. To whom does this apply**

The CGD/E policy on research independence applies to employees of CGD/E as well as contractors or other affiliates (including non-resident fellows) insofar as they (employees, contractors, or other affiliates) are carrying out either research funded through CGD/E or research that will be associated with CGD/E either because it is released as a CGD/E product (e.g., blog, working papers, policy papers, reports, briefs) or because the author uses their CGD/E affiliation in publishing the work in a non-CGD/E outlet.

### **3. Policy**

- 3.1. CGD/E research is independent. There can be no conditions or limitations on CGD/E's independence in research, findings, conclusions, or resulting publications. No third party may influence the research methods or conclusions of CGD/E research. The independence of CGD/E's research—from research methods to conclusions—is one of the reasons that many in the international development policy community regularly turn to CGD/E findings. All persons carrying out research on behalf of CGD/E should endeavor to maintain this research independence.
- 3.2. Where appropriate, CGD/E may welcome and consider comments or views from donors, but CGD/E will retain total discretion and final decision-making authority regarding program and project research topics, speakers, and participants in activities, and on the contents of reports.
- 3.3. If a researcher feels that they are being pressured inappropriately to adjust their methods or conclusions by a donor or other party, they should report this to a member of the management team.
- 3.4. CGD/E retains total discretion and accountability regarding the use of funds received, subject only to our commitment to use said funds for the programs or projects detailed in funding proposals.
- 3.5. CGD/E's employees and agents shall not engage in federal lobbying contacts or federal lobbying activity, as such terms are defined in the Lobbying Disclosure Act of 1995, 2 U.S.C. § 1601, et. seq., as amended, on behalf of any donor, including making any oral or written communication, including electronic communication, to a covered federal executive or legislative branch official on behalf of any donor regarding: the formulation, modification, or adoption of federal legislation, rules, regulations, Executive orders, or other governmental programs, policies, or positions; the administration or execution of federal programs or policies, including the negotiation, administration,

or award of contracts, loans, grants, permits or licenses; or the nomination or confirmation of a person subject to confirmation by the Senate.

- 3.6. CGD/E shall not function directly or indirectly as a donor's representative or agent to the public at large. CGD/E and its employees and agents shall not act as agents of any foreign principal as such terms are defined in the Foreign Agents Registration Act, 22 U.S.C. § 601 et. seq., as amended.
- 3.7. CGD/E shall not undertake activities on behalf of the donor that constitute “political activities” under the Foreign Agents Registration Act, including activities that are intended to in any way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a foreign government or foreign political party.
- 3.8. CGD/E’s work shall not be directed by a foreign government or foreign political party and shall not directly promote the public or political interests of a foreign government or foreign political party.
- 3.9. Employees of CGD/E are free to engage in political activities on a personal basis, provided the activities do not conflict with the ability to carry out CGD/E responsibilities or create confusion between positions or actions that are taken by them personally versus as a CGD/E representative.
- 3.10. CGD/E does not lobby for specific legislation or spending levels.

#### **4. Annexes**

##### Annex A: CGD Organizational Policies and Terms

*CGD is an independent and nonpartisan research institution. As such, and as in the case of all donations to CGD, CGD retains total discretion regarding the use of funds, subject only to our commitment to use said funds for the programs or projects described in the enclosed proposal. There can be no conditions or limitations on CGD’s independence in research, findings, conclusions, or resulting publications. Where appropriate, CGD may welcome and consider comments or views from donors, but CGD will retain total discretion and final decision-making authority regarding program and project research topics, speakers, and participants in events and activities, and on the contents of reports. CGD shall be the sole and exclusive owner of any and all products, services, processes, technologies, materials, software, data, files, lists, documents, computer records, research, compositions, works of authorship, computer programs, work product, know-how, algorithm, method, process, procedure, improvement, discovery, invention, other innovations, and intellectual property (“Work Product”) made, conceived, reduced to practice, or learned, either by CGD alone or jointly with other collaborators, as developed or acquired with donor support. Work Product shall immediately become and remain the exclusive property of CGD, regardless of whether such Work Product is patentable or copyrightable.*

*CGD will continue to ensure that its organizational culture, human resources policies and practices, and approach to research and partnerships adhere to [its stated commitment to diversity, inclusion, and equity](#). We will work to (1) increase the diversity of our staff; and (2) promote a culture that emphasizes the diversity of backgrounds and perspectives. CGD has adopted employment policies in furtherance of these values and in compliance with all applicable laws, including but not limited to an equal employment opportunity and harassment policy, and expects its partners to do the same.*

*CGD’s employees and agents shall not engage in federal lobbying contacts or federal lobbying activity, as such terms are defined in the Lobbying Disclosure Act of 1995, 2 U.S.C. § 1601, et. seq., as amended, on behalf of any donor, including making any oral or written communication, including electronic communication, to a covered federal executive or legislative branch official on behalf of any donor*

*regarding: the formulation, modification, or adoption of federal legislation, rules, regulations, Executive orders, or other governmental programs, policies, or positions; the administration or execution of federal programs or policies, including the negotiation, administration, or award of contracts, loans, grants, permits or licenses; or the nomination or confirmation of a person subject to confirmation by the Senate. CGD shall not function directly or indirectly as a donor's representative or agent to the public at large. In carrying out the activities described in this proposal, CGD and its employees and agents shall not act as agents of any foreign principal as such terms are defined in the Foreign Agents Registration Act, 22 U.S.C. § 601 et. seq., as amended. Further, CGD shall not undertake activities on behalf of the donor that constitute "political activities" under the Foreign Agents Registration Act, including activities that are intended to in any way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a foreign government or foreign political party. For the avoidance of doubt, CGD's work shall not be directed by a foreign government or foreign political party and shall not directly promote the public or political interests of a foreign government or foreign political party. CGD's tax identification number is 52-2351337. CGD Europe is established as a company limited by guarantee in the UK and as a registered UK charity (number 1157318).*

#### Annex B: CGD Conflict of Interest Policy

In an effort to prevent potential conflicts, those CGD employees who are permitted to accept remuneration for activities that are related to expertise as a CGD employee or in any way related to the business of CGD (Senior Fellows and select others) should do so only with the prior approval of the President in any case where they suspect there could be a conflict of interest or the perception thereof, and in any case where expected remuneration will exceed \$10,000. These employees must also report annually to the President the total outside compensation. In seeking approval and in annual reporting, the employee should disclose the organization for which the work will be done, the nature of the work, the time commitment and remuneration, as well as an evaluation of any potential conflict of interest that could arise with CGD as a result of the employee's engagement in such activity.

In an effort to prevent potential conflicts, if and when the President accepts remuneration for activities that are related to her/his expertise as a CGD employee or in any way related to the business of CGD, he/she should do so only with the prior approval of the Chair of the Executive Committee of the Board of Directors in any case where he/she suspects there could be a conflict of interest or the perception thereof, and in any case where expected remuneration will exceed \$10,000. The President must also report annually the total outside compensation to the Chair of the Executive Committee of the Board of Directors. In seeking approval and in the annual report, the President should disclose the organization for which the work will be done, the nature of the work, the time commitment and remuneration, as well as an evaluation of any potential conflict of interest that could arise with CGD as a result of the President's engagement in such activity.

**Political Activities of Employees:** As a section 501(c)(3) organization, the Center for Global Development is strictly prohibited from engaging in electoral political activity. Employees of the Center for Global Development are free to engage in these types of political activities on a personal basis, provided the activities do not conflict with the ability to carry out CGD responsibilities or create confusion between positions or actions that are taken by them personally versus as a CGD representative. Before an employee becomes actively involved in a political campaign or activity, the employee should discuss with CGD President appropriate actions to avoid or minimize the risk of the employee's personal actions being attributed to CGD and also review any other unintended potential impacts such activity could have on CGD. Individual political activities must only be undertaken at the employee's own expense, and without use of CGD's name, resources, facilities, or equipment. Only the CGD President can authorize the taking of any position by CGD on legislation, referenda, or the like.

### Annex C: CGD Policy for US Government Outreach

All CGD employees and agents shall keep their individual time spent on lobbying activities as defined by the Lobbying Disclosure Act under 20 percent of their time spent working for CGD in a three-month period. CGD employees and agents shall not assist with the drafting of legislation, even within time or expenditure limits that would not trigger LDA registration, except that individuals can provide technical advice in response to a specific request for information from a covered official. CGD employees and agents who have previously held US government positions or appointments and may be subject to federal post-government employment restrictions must consult with counsel before engaging in activities involving US government officials or agencies. CGD does not take institutional policy positions. As such, CGD does not lobby for specific legislation or spending levels, even within time or expenditure limits that would not trigger LDA registration. An individual employee may elect to publicly support specific legislation through media, blogs, etc.