

# An ethical framework for think tanks: Easier drafted than done?

**Fabian Zuleeg**

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*Credit: European Policy Centre*

# Table of contents

<b>Executive summary</b>	<b>3</b>
<b>Introduction</b>	<b>4</b>
<b>What is a think tank?</b>	<b>5</b>
<b>Why the ethical conduct of think tanks matters</b>	<b>5</b>
<b>Barriers arising from the nature of the market</b>	<b>5</b>
<b>The additional challenge of COVID-19</b>	<b>6</b>
<b>The implications of structural differences</b>	<b>6</b>
<b>Cornerstones of an ethical framework for non-academic research organisations</b>	<b>8</b>
<b>An ethical framework for academic and non-academic research</b>	<b>10</b>
<b>A ‘European Alliance of Independent Think Tanks’</b>	<b>10</b>
<b>An ethical framework for think tanks</b>	<b>12</b>
<b>Annex A: How to implement the Accord</b>	<b>12</b>
<b>Endnotes</b>	<b>13</b>

## ABOUT THE AUTHOR



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## ACKNOWLEDGEMENT/DISCLAIMER

The main aim of the Promoting Ethics and Integrity in Non-Medical Research (PRO-RES) project is to encourage policymakers and their advisors to base their decisions on evidence derived from research that has been conducted ethically and with integrity. That means supporting evidence gatherers, researchers and their funders with the necessary resources to ensure that their work is conducted in a fair, transparent manner and that any research subjects are treated with dignity and respect for their rights. In turn, the project aims to support policymakers in openly selecting ‘ethical evidence’ for the decisions they make. The PRO-RES project has received funding from the EU’s Horizon 2020 programme, under grant agreement number 788352.

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# Executive summary

This Discussion Paper sets out why the ethical conduct of think tanks matters, outlines the main challenges in the non-academic research marketplace and provides suggestions as to how think tanks can be encouraged to sign up and adhere to ethical principles. It is part of the European Commission-financed PRO-RES (Promoting Ethics and Integrity in Non-Medical Research) Project, which aims to support evidence gatherers, researchers and their funders with the resources they need to ensure their work is conducted in a fair, transparent manner, and that all research subjects are treated with dignity, and their rights are respected.

Whether think tanks conduct their activities in alignment with ethical principles matters to society. They can fulfil an important democratic function by challenging policymakers to implement innovative solutions based on evidence, and respond to policy challenges quickly and innovatively. They are able to provide answers and recommendations on policy and can be more easily integrated into the policy process. However, if they act unethically, non-academic research organisations can exercise a negative influence on democracy by deliberately manipulating policymaking and public opinion.

But non-academic research, analysis and policy advice take place in a very different environment than academic research. There is not even a clear definition of what a think tank is; any organisation can choose to use this label. Think tanks also face very different financial pressures and much of their activities take place behind closed doors. The results of those conversations often remain unpublished. Misbehaviour is arguably more difficult to detect and enforce. The COVID-19 crisis is likely to complicate things further. Funding for think tanks will take a hit, making it more difficult to resist the influence of vested interests, especially if they underpin the financial model of an organisation.

**There is not even a clear definition of what a think tank is; any organisation can choose to use this label.**

Competition in the non-academic research sector also adds more challenges. At best, following an ethical research framework provides marginal benefits (e.g. potentially better access to public research funding), but at worst, it can be a competitive disadvantage if there is no significant sanctioning of misbehaviour. Simply attempting to impose a framework will lead to displacement. There is a need to reverse incentives and create an ethical framework that benefits those who are willing to abide by it.

Such an ethical framework must start from the recognition that independence lies at the heart of think tank credibility. To achieve this, think tanks must have diversity of funding, adequate governance structures and be transparent about their operations. In addition, there is a need to have a multi-stakeholder approach, acting as a bridge between a wide range of actors in the policy process. At the same time, think tanks should be mindful of equality and diversity concerns, ensuring that their operations are not biased or driven by a lack of participation of certain groups. Involving multiple stakeholders, transparency and good governance – and ultimately independence – are not optional extras that can be discarded when inconvenient but are at the core of think tanks’ legitimacy.

**At the core of this project is the Accord, which is a statement of broad principles that organisations can sign up to, including a commitment to only use research that is undertaken ethically.**

The PRO-RES project is working on creating an ethical research framework that applies to both academic and non-academic research. At the core of this project is the Accord, which is a statement of broad principles that organisations can sign up to, including a commitment to only use research that is undertaken ethically. It recognises that high-quality research is a pre-condition for evidence-based policy-/decision-making and hence rational policy actions and outcomes.

But an ethical framework cannot simply be imposed top-down. It should be developed by the organisations themselves, and adhering to such a framework must be incentivised rather than mandated. In addition, the implementation mechanism should be designed in such a way that it rewards those organisations that stick to the rules while creating disadvantages for the ‘black sheep’.

One route to implementation is the right kind of funding to improve think tanks’ sustainability, both for individual think tanks and for capacity building in the sector as a whole. It should be made conditional upon the think tank’s commitment to the principles set out above. Funding should also be structural rather than project-based, to enable think tanks to improve their organisational capacity.

The establishment of a ‘European Think Tank Centre’ or ‘European Alliance of Independent Think Tanks’ could be an important step in building capacity for the sector.

Such an organisation would need to be fully funded and have a transparent structure, including clear criteria for membership based on the principles mentioned above. It could lobby on behalf of the think tank sector, for example with EU institutions, not only regarding funding but also to protect think tanks from commercial or governmental interference. It could provide information on the think tank sector across Europe and within different countries, as well as potentially develop a methodology for ranking a think tank's impact.

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**Building on the PRO-RES project, it could, for example, draw up guidelines for projects that are not primarily based on research.**

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A European Alliance of Independent Think Tanks could provide a forum for exchanging experiences and developing joint activities and common networks. It could help support the transnationalisation of think tanks, particularly the creation of a network with an independent identity. The Alliance could also develop

## Introduction

Within the academic sector, the ethical conduct of research is usually accorded high importance – especially when this research has direct public policy relevance. It is generally recognised that such research should be in line with ethical principles, and individual researchers, academic institutions and large-scale institutional (i.e. public sector) funders all recognise their importance. While the implementation of these principles can sometimes be challenging, the *need* for them is not in question, and there are frameworks, mechanisms and institutions to underpin this commitment.<sup>1</sup>

In contrast, non-academic research, analysis and policy advice – the activities of think tanks and non-academic research institutes – take place in a very different environment. While many of the individuals and institutions active in this sector are equally committed to ethical principles, it can be difficult to monitor and enforce adherence to them, given the nature of its activities and the persistent presence of ‘black sheep’ hiding behind the claim of being a think tank.

**When attempting to set out (and see implemented) ethical guidelines for research in the non-medical field, particularly in the context of evidence provided for policymaking, the non-academic sector is crucial.** While difficult to define and delineate, this particular

projects of scale which require cross-border think tank cooperation, for instance, on the future of European democracy. In situations where a think tank can no longer operate in its home country, parts of its operations could be hosted by other network partners, thus providing an institutional framework for continued operations.

The Alliance would also be the first step in developing the ethical framework for this sector further. Building on the PRO-RES project, it could, for example, draw up guidelines for projects that are not primarily based on research. In particular, it could create the forum and be the ‘pen’ for the further elaboration of the ethical framework, thus initiating the co-creation of the framework within the sector and ensuring a much greater buy-in. In addition, there is a need to develop an independent, global hallmark/quality label for think tanks adhering to ethical principles, as well as to build capacity through training and targeted support.

Further developing and implementing an ethical framework within the sector and underpinning this with broad support would maximise the usage and impact of the framework. Capacity building would strengthen organisations and the researchers working for them. Following the framework and turning ‘good behaviour’ into a marketing tool should be incentivised through conditional funding and public scrutiny, turning ethical behaviour into a competitive advantage for think tanks.

subset of the research field (i.e. non-academic, focused on policy) is probably more prominent and impactful than the research subset that would typically be covered by such an ethical framework (i.e. academic, focused on policy).

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This Discussion Paper sets out why the ethical conduct of think tanks matters, outlines the challenges arising from the non-academic research marketplace, and provides suggestions as to how think tanks can be encouraged to sign up and adhere to ethical principles.

## What is a think tank?

**There is no clear definition of a think tank; any organisation can choose to use this label.** In its broadest sense, it is an organisation that aims to influence policy through research, analysis and policy advice. The non-academic research sector contains a wide range of different actors: classical think tanks as well as foundations (including ones connected to political parties), independent research institutes, trade associations, research bodies linked to unions or employers’ organisations, consultancies, research departments of private companies, non-governmental organisations (NGOs) and so on.<sup>2</sup> Not only is there a plethora of organisations, some actors in the field also take advantage of these undefined structures to influence policy without disclosing their potential conflicts of interest. For example, they could act through or even found a ‘think tank’ that only serves a particular interest, being neither transparent nor independent.

European think tanks<sup>3</sup> are generally rather small-scale, both in terms of their overall budget and workforce. Many think tanks are self-financing NGOs; their funding model usually relies on diverse sources of generally short-term funding. Some think tanks receive significant public core funding, being at times explicitly affiliated with or part of a structure, such as political parties or a government.

Arguably, **research is not what lies at the core of think tank activity. Rather, the focus is on evidence-based analysis and policy advice**, which does include research studies but also relies on a wide range of other sources. Much of the activity of think tanks take place behind closed doors, with results often remaining unpublished. Monitoring and enforcing the ethical conduct of such activities is far more challenging than setting up in the public eye a research project with clear ethical guidelines, an ethical review process and (public) project funding that is conditional on ethical conduct. Having this different focus implies that there is a need to create the right incentives for think tanks to adhere to ethical guidelines that are in line with the marketplace in which they operate.

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## Why the ethical conduct of think tanks matters

Whether think tanks conduct their activities in alignment with ethical principles or not matters to society. They can fulfil an important democratic function, challenging policymakers to implement innovative solutions based on evidence. Organisations in the non-academic research sector can connect a range of different stakeholders and provide a platform for evidence-based debate. Non-academic research, analysis and policy advice can be of critical importance to decision-makers. This is because it can respond to policy challenges quickly and innovatively, and provide answers and recommendations that are specifically focused on policy and more easily integrated into the policy process. However, if acting unethically, non-academic research organisations can exercise a negative

influence on democracy by deliberately manipulating policymaking and public opinion.

Ethical conduct matters to think tanks themselves and the individuals working for them. In addition to staffs’ personal commitment to such a principle, it is also crucial for a think tank’s independence and derived credibility in terms of both effectiveness and legitimacy. **Given that the explicit aim of think tanks is to influence (democratic) policy decisions, the legitimacy derived from an underlying commitment to ethical principles provides the basis for justified intervention in the decision-making process.** In essence, think tanks that do not adhere to ethical principles lack the democratic legitimacy for their activities.

## Barriers arising from the nature of the market

One reason why the distinction between academic and non-academic research matters is because organisations operating in the **different segments of the research**

**field face a very different marketplace, and hence very different incentives.** Below is a chart of the differences between evidence-based analysis and advice

organisations (with a particular focus on think tanks) versus more traditional academic research organisations (see Table 1).

Of course, the distinction is far from clear-cut in reality, and there might well be hybrid forms (e.g. think tanks housed in universities). Presenting this as a strict dichotomy would be misleading. Rather, it should be understood as a broad spectrum, with non-academic research organisations tending towards one end and academic research to the other. There will undoubtedly be exceptions to the general structures at both ends.

It is important to emphasise that Table 1 is not a categorisation that distinguishes between ethical or non-ethical behaviour. Rather, it is an attempt to characterise the structural differences between the different actors. In both sides of the research spectrum, there is a need to follow legal requirements, (e.g. the General Data Protection Regulation 2016/679; GDPR).<sup>5</sup> There is also a need to maintain research integrity by combating

plagiarism, falsification and fabrication. However, misbehaviour is arguably more difficult to detect and enforce in the non-academic sector, as more of the activity takes place below the radar.

In any case, there will always be misbehaving ‘black sheep’ on both sides of the spectrum, suffering from (undisclosed) conflicts of interest; making biased use of data; manipulating evidence; and deliberately misleading decision-makers, the public and funders. However, the non-academic sector is also arguably less ‘regulated’ (i.e. less bound to a particular set of ethical rules, less dependent on funding attached to those rules). It can be more difficult to demonstrate bias than for activities carried out by scientific method. In addition, organisations in the non-academic sector often lack the organisational infrastructure to enforce ethical guidelines (e.g. ethical review processes) effectively, in part due to its smaller scale and the costs involved. Moreover, the enforcement of such guidelines does not always offer clear benefits either (e.g. additional funding).

## The additional challenge of COVID-19

Given the COVID-19 pandemic and its political, economic and social aftermath, the need and demand for think tank analysis and advice have increased further. Not least since the ongoing crisis requires rapid responses to complex, new and interconnected policy challenges in a world characterised by endemic uncertainty.

**The COVID-19 crisis is likely to have a negative impact on funding for think tanks.**

However, at the same time, **the COVID-19 crisis is likely to have a negative impact on funding for think tanks: in times of crisis, support for such organisations is often seen as a relatively easy target for reducing expenditure** by not only private firms, but also cash-strapped public authorities. This increases the financial vulnerability of think tanks, making it more difficult to resist the influence of vested interests if they underpin the financial model of the organisation.

## The implications of structural differences

These structural differences imply that academic and non-academic research organisations tend to operate differently, driven by a different set of incentives. While following the principle enshrined in an ethical research framework is core to academic organisations’ operations, this is not the case for non-academic organisations. Indeed, the latter often face funders that are not focused on ethical principles and might not even want the organisation to follow strict ethical guidelines. Rather, they might insist that, for instance, the organisations should strive to maximise effectiveness in policy influence. It follows that any ethical framework must be adapted to the needs of non-academic organisations and that its implementation needs to be incentivised for this sector.

This point is reinforced by the competition in the non-academic research sector. **At best, following an ethical research framework provides marginal benefits (e.g. potentially better access to public research funding). However, at worst, it can be a competitive disadvantage.** In essence, if there is no significant sanctioning of misbehaviour, acting non-ethically can be a competitive advantage. For example, accessing funding for advocacy and lobbying or being more effective in changing policy by using covert and underhanded methods.

Simply attempting to impose a framework will lead to displacement. For example, it could lead to one part of the sector no longer operating under such a framework

**Table 1: Differences in the marketplace between academic and non-academic research organisations**

Traditional research organisations/higher education research	Think tanks & specific non-academic research institutes <sup>4</sup>
Commitment to scientific ‘truth’	Commitment to a mission, objective, impact and/or (potentially political/ideological) direction
Primary research	Interpretation & analysis of a broad range of existing evidence
Mostly based on historical data	Forward-looking
Generation of new knowledge	Application of existing research results
Objective	Normative
Current state of knowledge	Recommendations
The provision of public goods	Working for/with stakeholders to meet specific interests and needs, public interest rather than the public good
Peer review	Assessment by ‘clients’ & relevancy determined by decision-makers’ uptake
Critical assessment by other academics/academic institutions	Seldom think tank peer review or criticism
Base funding through dedicated research funding, but with conditions determined by the communal funding bodies (i.e. governments, EU)	Diverse funding with distinct interests
Long-term funding	Short-term funding
Strong incentive to respect research guidelines	Weak incentive to respect research guidelines
	At times, precarious balance between the strategic content and interest of stakeholders providing short-term funds
Defined organisational form, not-for-profit	Diverse organisational forms, variety of governance models, not necessarily not-for-profit
Clearly definable conflicts of interest	Competing interests, no clear-cut hierarchy of right or wrong
Defined sector with governance structures	Undefined sector with no common organisational structure
Official status	Blurry delineation
	Self-identification (sometimes with intention to deceive)
Clear employment roles/relationship	Individuals can be objects/subjects, researchers, funders, founders and/or decision-makers of governance bodies simultaneously
Clear-cut institutional association of individuals	Multiple forms of work relationships/ arrangements
Providing research environment/collaboration	Providing a platform for debate
Research design to encourage the production of objective findings, transparency and replicability	Research & analysis that simultaneously aims to influence (e.g. interviews with decision-makers, task forces, workshops), often behind closed doors and ‘one-off’ activities, not part of a research project
Public, open-access	Informal, below-the-radar, private information
Dispassionate provision of research results	Proactive involvement in the political debate
A restricted number of core funders	Wide variety of funders
Some endowments	Year-to-year survival
Increasing pressure to create spin-offs and return on investment	Little to no endowments
Uniform type of research projects, guided by a common framework (determined by funders)	Different type of projects with different rules/guidelines
Longer-term, structured, predictable processes and outcomes	Fast, uncertain, risky, unproven/unprovable processes and outcomes

and promising clients more, precisely because these rules do not bind them. It can thus be a competitive advantage *not* to follow the rules. **There is a need to reverse incentives and create an ethical framework that benefits those who are willing to abide by it.**

# Cornerstones of an ethical framework for non-academic research organisations

The structural differences between academic and non-academic research providers raise the question of what guidelines are appropriate. In other words, which operational principles should guide the work of a think tank to underpin its independence, credibility and legitimacy?

- A commitment to existing guidelines on, for example, research conduct or opinion polling? A commitment to all elements, or only some?
- A commitment to not deliberately mislead or misrepresent the evidence (i.e. ‘the end does not justify the means’)?<sup>6</sup>
- Clarity of purpose and interests?<sup>7</sup>
- Non-dependence on individual sources of funding/ diverse funding sources? Clear rules tied to funding arrangements?
- Governance and transparency to safeguard the think tank’s independence?

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**Think tanks should act as a bridge between a wide range of actors in the policy process, including those that might struggle to engage effectively without the facilitation of think tanks.**

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**For non-academic research organisations, and particularly think tanks, independence lies at the heart of their credibility.** They must ensure and demonstrate their independence, including that the funding they receive might influence their agenda (i.e. topics of interest) but not the results of their analysis (i.e. conclusions and recommendations). To achieve this, **think tanks must have adequate governance structures and be transparent about their operations.**

Another crucial element is the multi-stakeholder approach. Think tanks should act as a bridge between a wide range of actors in the policy process, including those that might struggle to engage effectively without the facilitation of think tanks. Policy debates must take different viewpoints into account and ensure that policy recommendations are developed by considering different and, at times, opposing views.

At the same time, think tanks should be mindful of equality and diversity concerns, ensuring that their operations are not biased or driven by a lack of participation of certain groups, whether it be in terms of governance structures, management, senior staff or guest speakers.

Having different views and groups represented in the political/policy process is essential. Having different views and conflicting solutions is part of democratic debate. Indeed, a thesis that is confronted by an antithesis and thus leads to synthesis is core to the development of better policies. Different opinions and their advocacy are a sign of a healthy democratic debate, and a wide range of political opinion must be legitimate in the absence of universal truth. **All ethical frameworks must ensure that it prevents the abuse of freedom of speech but does not constrain the right itself or a broad, opinion-driven political debate.** This requires an approach that is not rigid nor legalistic but rather incentivises ethical principles through better governance and greater transparency.

Greater transparency tends to enforce better governance by ensuring that there is public scrutiny. Good governance is not only ‘doing the right thing’, but to be *seen* doing the right thing. However, **better governance and greater transparency do not come for free.** At the very least, they involve managerial and administrative efforts and can slow down decision-making. They can also negatively impact the financial sustainability (e.g. by ruling out certain sources of funding), continuation (e.g. reducing the incentives for key people to remain involved) and impact (e.g. limiting the ability to work behind the scenes) of a think tank (see Infobox 1).

Nevertheless, multi-stakeholder working, transparency and good governance – and ultimately independence – are not optional extras that can be discarded when inconvenient. A think tank that cannot deliver a high standard of governance and transparency should consider whether it can fulfil its functions. Think tanks should strive towards these high standards of governance and transparency and be asked to demonstrate their adherence to these principles when interacting with funders. In a world where they take on a stronger political role, they must be ‘holier than thou’ and provide as few points of attack as possible to their new political opponents, who can otherwise challenge their legitimacy.

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## INFOBOX 1: TRANSPARENCY AND GOVERNANCE

**Transparency** is the minimum degree of *disclosure* of activities, governance arrangements, financing, and people and organisations involved in the work of a think tank. All these elements should be open to all for verification.

A think tank’s policy of transparency should consist of the following characteristics:

### Comprehensive

- Historic and timely organisational information (i.e. not years out of date)
- Activities, financial and governance transparency
- Details on all financial support (including source) above a relatively modest threshold
- Publicising all people directly involved in the think tank (i.e. staff, experts, governance)

### Accessible

- Organisational information easy to find and access
- Obvious links on the website homepage
- Information available in a variety of languages
- Contact details for further information

### Transparent by default

- Making information available proactively
- Explaining exceptions clearly (e.g. commercial confidentiality, proprietorial information)
- All information necessary to assess good governance (as set out above) freely available

**Governance** is how a think tank is managed, how decisions are taken (both day-to-day and in the long term), the organisational form (i.e. statutes and bylaws) and how the monitoring function is performed. Good governance should include the following elements:

### Financial governance

- Avoiding dependency on a single/limited number of funders
- A plurality of types of funding
- External auditing
- Financial management principles (e.g. multiple people involved in payments)

### Structural governance

- Appropriate legal form
- No direct relation to governments, political parties, etc.
- Clear roles and functions of governance bodies, including who appoints whom
- Implicit ‘owners’ (e.g. founders)

### Transparent management

- Role of executive director or equivalent
- Succession planning for key personnel (i.e. those who can provide think tank resources)
- Separate roles for income earners and pro bono overseers (e.g. in a non-remunerated governing board)
- Who speaks for the think tank/can establish think tank positions

### Policies and principles

- An explicit mission statement
- Clear commitment to transparency
- Good governance
- Independence
- Quality management procedures
- Not-for-profit
- Policies on data protection, copyright, environment, equality and diversity, etc.
- Commitment to evidence-based working
- Involvement of multiple stakeholders
- External reporting

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**Greater transparency tends to enforce better governance by ensuring that there is public scrutiny. Good governance is not only ‘doing the right thing’, but to be *seen* doing the right thing.**

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## INFOBOX 2: THE PRO-RES ACCORD

As signatories to this Accord:

- We commit only to use research that is undertaken ethically.
- We recognise that an underpinning by high-quality research and evidence, including policy appraisals and evaluations, is a pre-condition for evidence-based policy-/decision-making, and hence rational policy actions and outcomes.
- We will seek to employ high-quality evidence that has been gathered, collated and analysed using sound, robust and ethical methods.
- We will attempt to ensure that the funding, management, conduct, dissemination and governance of research meets high standards of ethics and integrity.
- As individuals and institutions involved in collecting and/or using evidence in policymaking, we aim to be transparent on how the high quality of that evidence is assured and will flag up any potential conflicts of interest.
- We agree that the independence and integrity of individuals responsible for the gathering of research evidence and its use in policymaking must be respected and supported in ways that ensure the evidence they produce is neither biased nor misleading.

## An ethical framework for academic and non-academic research

The European Commission-financed PRO-RES project (Promoting Ethics and Integrity in Non-Medical Research) is working on creating an ethical research framework that applies to both academic and non-academic research.<sup>8</sup> At the heart of the project is 'the Accord', which is envisaged as a statement of principle that academic and non-academic organisations can endorse and sign up to (see Infobox 2).

The Accord is also underpinned by principles and rationale that set out in greater detail what it entails when applied to research activities (see Infobox 3).

Annex A provides a toolbox to help implement the Accord.<sup>9</sup> However, the crucial question is how to implement, enforce and/or encourage these principles. Given the structural issues set out above, **an ethical framework cannot simply be imposed top-down. Organisations should develop it themselves, and the adherence to such a framework must be incentivised rather than mandated.** In addition, the implementation mechanism should be designed in such a way that it rewards those organisations that adhere while creating disadvantages for the 'black sheep'.

## INFOBOX 3: THE PRINCIPLES AND RATIONALE BEHIND THE PRO-RES ACCORD

The following points explain the rationale behind the Accord and supply supportive resources that will help promote the ethics and integrity of the evidence produced in all non-medical research:

- Under a commitment to evidence-based policy, all evidence should be based as far as possible on ethically sound research and analysis.
- There are many forms of research and evidence. They include not just formal research projects and programmes, but also a range of actions relating to investigation, collation, discovery, exploration, practice and disciplinary development. Every kind of research and analysis must be conducted ethically.
- Research should be beneficent (or at least non-maleficent) in its aims, substantive focus, research and application.
- Ethical issues can arise at every stage of research: conception, development, proposal, process, conclusion and dissemination. It follows that ethical consideration cannot be a single-stage process; it must be continuous.
- Researchers and analysts should be aware of and sensitive to the ethical dimensions of their work. That awareness depends on engaging in ethical discourse, as an integral aspect of conducting research and analysis. A fixed number of pre-set rules cannot adequately guarantee ethical conduct.
- All researchers and analysts should aim to develop a culture of ethical research, based on continuous discursive engagement. To achieve this, everyone responsible for the process, including researchers, stakeholders, peers and the users of research, should be engaged.
- Research and policy advice should not be based on pre-formed prejudicial ideologies, or biased political or financial interests.
- Conflicts of interest are ideally avoided in the production of research evidence and provision of policy advice. If this is not possible, all conflicts of interest should be openly disclosed.
- Whenever possible, all sources of information used to formulate evidence should be acknowledged, with exceptions being well-justified and, if feasible, noted (e.g. in the case of confidential information or views).
- Research must be methodologically robust to produce high-quality evidence.
- Only research that has also been conducted ethically and with integrity can be considered 'high-quality'.
- All research should be funded, managed, conducted and disseminated ethically and with integrity.
- The processes and institutions involved in the selection of evidence, including research, to inform policy should be independent, open and transparent.
- The effectiveness and impact of all policies should be honestly and transparently assessed or evaluated, using high-quality research methods.

## A 'European Alliance of Independent Think Tanks'

One route to implementation is the right kind of funding to improve think tanks' sustainability, both for individual think tanks and capacity building in the sector as a whole. The funding should be made conditional on the think tanks' commitment to the principles set out above, as well as a shared understanding of the common mission and purpose or public interest: the defence of an open, democratic, progressive and pluralistic society. It should be structural support-based rather than project-based, to enable think tanks to improve their organisational capacity and recognise that adhering to these principles strictly has financial sustainability consequences.

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**A fund of funds for institutional support for think tanks could be an important tool for improving their sustainability.**

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A fund of funds for institutional support for think tanks could be an important tool for improving their sustainability; where funders can channel funding regionally. If set up with clear criteria for funding and high standards of transparency and governance, the funding could act as a protective barrier against those that claim that it represents hidden interests.

However, a significant part of think tank funding should remain competitive to ensure that the marketplace can incentivise the pursuit of effectiveness, efficiency and competition. The traditional dependence on corporate or government funding should not be replaced by a dependence on a single source of funding, even if philanthropic motives drive it. All funding carries implications, and diverse funding is a crucial safeguard.

Where project funding is provided, recognition is needed that for independent think tanks, any project funding should include a high proportion of operational funding that is more akin to commercial funding models than academic. Any difficult reporting, monitoring and evaluation requirements should be funded fully from the outset.

**The establishment of a 'European Think Tank Centre' or 'European Alliance of Independent Think Tanks' could be an important step to building capacity for the sector.** Such an organisation would need to be fully funded and have a transparent structure, including clear criteria for membership based on the above principles. It could lobby on behalf of the think tank sector, for example with EU institutions, not only regarding funding but also protecting think tanks from commercial or governmental interference. It could provide information on the think tank sector across Europe and within the different countries, as well as potentially develop a methodology for and ranking of think tank impact.

A European Alliance of Independent Think Tanks could provide a forum for exchanging experience and developing joint activities and common networks. It could help support the transnationalisation of think tanks, particularly the creation of a network with an independent identity. In situations where a think tank can no longer operate in their home country, parts of its operations could be hosted by other network partners, thus providing an institutional framework for continued operations.

The Alliance could also develop projects of scale which require cross-border think tank cooperation, for instance, on the future of European democracy. Such a project would include work on using information and communications technology (ICT; e.g. liquid democracy) to trigger informed debates by citizens on EU policies with direct policy impact (through the integration of new technology-enabled citizen debate into the activities of a think tank). Such large-scale projects could provide important input for developing cross-cutting and pan-European policies, such as the Conference on the Future of Europe.

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**Such an organisation would need to be fully funded and have a transparent structure, including clear criteria for membership based on the above principles.**

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# An ethical framework for think tanks

The Alliance would also be the first step to developing the ethical framework for this sector further. Building on the PRO-RES' work, it could, for example, draw out guidelines for projects that are not primarily based around research. In particular, it could:

- create the forum and be the 'pen' for the further elaboration of the ethical framework, thus initiating the co-creation of the framework within the sector and ensuring a much greater buy-in;
- develop guidelines for think tanks on how to implement a variety of cross-cutting concerns (e.g. on data protection);
- monitor how the ethical framework is being used after basing its development on good governance and transparency (e.g. in funding decisions, whether adherence is leading to privileged access to decision-makers);
- develop an independent, global hallmark/quality label for think tanks adhering to certain principles (i.e. independence, governance, transparency, multi-stakeholder engagement); and
- develop a code of conduct for individuals, that is recognised by the organisations in the sector and could form part of their employment contracts.

At the same time, the Alliance could channel support to those think tanks willing to abide by a common framework, to build capacity. This could include:

- providing organisational support (i.e. base funding);
- running training programmes for all think tank staff, including on transparency and good governance; and
- professionalising the management of think tanks through training focused on GDPR, ICT, communications, financial management systems, quality management and such.

Further developing and implementing an ethical framework within the sector and underpinning this with support would maximise the usage and impact of the framework. Capacity building would strengthen organisations and the researchers working for them. **Following the framework and turning 'good behaviour' into a marketing tool would be incentivised through conditional funding and public scrutiny, and turn ethical behaviour into a competitive advantage for non-academic research institutions.** In the end, the ethical framework should be embedded in the development of the sector as a whole. If it inherently makes sense to the organisations and researchers in question, both in terms of its content and the incentives to implement it, there will be buy-in. If not, little will be achieved in implementing ethical principles in the non-academic research sector.

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# Annex A: How to implement the Accord

To help implement the Promoting Ethics and Integrity in Non-Medical Research (PRO-RES) project's Accord and the principles behind it, users need to know the following:

- How to conduct research ethically and with integrity (for researchers, managers and funders).
- How to ensure research is conducted ethically and with integrity (for reviewers in research ethics appraisal).
- How to supply evidence for effective policymaking (for researchers, managers, funders).
- How to select high-quality research (for science/policy advisors and policymakers).
- How to evaluate the ethical impact of policies (for ALL above stakeholders).

## WHO were the researchers?

- What are the credentials of the researcher/research agency?
- What was their competence, experience, track record?
- Who did they work for?
- What kind of research agency are they?
- How was the agency funded/by whom?
- How was the specific project that generated the evidence in question funded?

## A TOOLBOX FOR ASSESSING THE ETHICAL QUALITY OF RESEARCH EVIDENCE

The following questions are addressed in the toolbox:

WHO did the research/provided analysis or advice?

HOW did they do the research, or on what did they base their advice and analysis?

WHOM/WHAT was being studied?

WHY was the research/analysis conducted?

WHEN/WHERE was the research/analysis conducted?

Was the research REVIEWED in advance?

What were the OUTCOMES of the research/analysis?

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<sup>1</sup> This Discussion Paper builds on Zuleeg, Fabian (forthcoming 2021), "Ethical guidelines for policy-focused research, analysis & advice organisations – a stretch too far?" in *Ethical Evidence: Research Integrity and Policymaking*, in the *Advances in Research Ethics and Integrity* series, Melbourne: Emerald Publishing.

<sup>2</sup> The range of actors also includes market research organisations and polling organisations. However, for the purpose of this Discussion Paper, these organisations have been excluded from the discussion due to the well-defined ethical framework that already exists for them.

<sup>3</sup> This Discussion Paper focuses on European think tanks, which differ from think tanks in other parts of the world in terms of size or endowments, for example.

<sup>4</sup> The focus in Table 1 is on non-academic organisations that are centred on research and analysis, in the pursuit of public interest. Of course, they will not all fall into this category. For example, private companies could have profit as an overriding aim.

<sup>5</sup> There is an argument that the legal framework and its implementation might require tightening up, to deter breaches in data protection more effectively, for example. However, those that engage in criminal behaviour for commercial or political gain should be carefully distinguished from those that simply struggle to implement the legal framework effectively, due to, for example, its complexity, a lack of funding or uncertainty.

<sup>6</sup> See e.g. *Institute of Financial Accountants*, "Technical resources > Ethics" (accessed 18 August 2020).

<sup>7</sup> This is different from 'transparency' as explored later in the Discussion Paper. It concerns ensuring that there is clarity on the politics of a think tank (i.e. objectives, mission, interests; e.g. through the provision of a mission statement).

<sup>8</sup> This framework is not yet final and will be adjusted according to comments and thoughts from different groups of stakeholders (including think tanks).

<sup>9</sup> Further detail is available at: <https://prores-project.eu/>



The **European Policy Centre** is an independent, not-for-profit think tank dedicated to fostering European integration through analysis and debate, supporting and challenging European decision-makers at all levels to make informed decisions based on sound evidence and analysis, and providing a platform for engaging partners, stakeholders and citizens in EU policymaking and in the debate about the future of Europe.

The **Europe's Political Economy Programme** is dedicated to covering topics related to EU economic policy, in a context of increasing globalisation and rapid technological change. From an intra-EU point of view, the Programme provides expertise on reforming and strengthening the Economic and Monetary Union (EMU) and regional economies; ensuring a holistic approach to industrial policy; supporting the Single Market and digital policy; as well as optimising the use of the EU budget and its programmes. Within the international context, the Programme focuses on trade policy and multilateral governance systems. The Programme's team is also a skilled analyst on the process of Brexit and the long-term relationship between the United Kingdom and the EU.

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