



## PROMoting ethics and integrity in non-medical RESearch

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## EXECUTIVE SUMMARY

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The PRO-RES project aims at PROmoting integrity in the use of RESearch results. With the support of a full range of stakeholders, the project seeks to develop a guidance framework fostering the highest standards of research ethics and scientific integrity, covering all non-medical sciences. Throughout the project, the consortium has extensively engaged with critical stakeholders and expected end-users of the tools such as universities, think tanks, policymakers and their scientific advisors, science advisors and communicators, journalists, NGOs, and practitioners.

In the context of the project, the EPC put specific emphasis on testing the framework with policymakers and stakeholders in Brussels. This report will summarise the recommendations of policymakers related to the application of the framework. Furthermore, the report will summarise the findings of the EPC's dialogue with fellow think tanks to assess how the draft framework could be made applicable for think tanks and similar 'evidence-generating organisations' and not just conventional research performing organisations.

Both stakeholder activities gave valuable recommendations on how to further improve the framework and showed that the consortium is on the right track with its current endeavours and the current draft framework. The following were the main outcomes of the exchanges with policymakers and stakeholders.

### **Results of the interaction with policymakers**

The dialogue with policymakers showed general support of policymakers towards the PRO-RES framework in its current form and gave recommendations concerning outstanding questions. The exchange emphasised the importance of the right balance between concreteness and a short document as well as the need for good promotion of the framework to ensure that it is applied universally. The issue of incentives was raised here as well.

The policymaker dialogue reinforced the findings of the general stakeholder engagement in both rounds and, more importantly, confirmed the projects' course and decisions made with respect to the design and the adaption of the framework. Based on the exchanges, the authors suggest the following action points:

- In order to get institutions to endorse and implement the framework, the project should intensify the contact to umbrella organisations and institutions in order to get them on board. This will make it easier for the accord to be endorsed by single organisations as well. The project has already started to work towards this end, especially in the context of the second phase of stakeholder activities.
- The project should work towards finding a positive definition of the target group of the framework. Instead of the term 'non-medical research', the goal would be to find a term which is more appealing for possible end users.
- The project will work towards being more concrete with respect to certain terms mentioned in the accord, as suggested by policymakers. However, the right balance between being clear and being short needs to be found.
- Stakeholders suggested to test the toolbox on different case studies. The project has already started this process and will continue to do so until the end of the project.
- It was suggested to add clear instructions to the toolbox on target audiences and how to use it.
- Several suggestions were made concerning the design of the toolbox. The project should advance its efforts to make the toolbox as visually appealing and easy to use as possible.
- In order to ensure that final framework meets the needs of policymakers, it will once more be discussed with policymakers.

## Results from the interaction with the think tank community

Drawing on a [Discussion Paper](#) on ethics in think tanks, published by the EPC, the project exchanged with the think tank community to receive feedback on the PRO-RES activities to ensure the PRO-RES framework will be applicable for think tanks as well. Think tanks generally voiced support towards an ethical framework for their work and welcomed the idea to take the PRO-RES framework as a starting point.

However, the interactions found that one problem is that the nature of think tank research is fundamentally different from academic work and is thus difficult to be kept under the same ethical guidelines. There is also a large variety of organisation forms in the sector, from institutionalised think tanks which are part of a university, to merely digital think tanks and even for-profit organisations. The most difficult point for the PRO-RES framework is, therefore, to find a universal set of criteria, which is truly inclusive to all sectors, including the think tank sector. Stakeholders also agreed that independence and transparency need to be the two key aspects of a framework which is inclusive for the think tank sector.

For many issues raised in the discussions, the PRO-RES framework could already bring valuable solutions in its current form. Furthermore, the initiative to build a think tank alliance was welcomed by stakeholders. Based on the stakeholder engagement with the think tank community, the authors, therefore, suggest the following action points:

- The activities undertaken constituted a first step towards a more regular and structured conversation between think tanks on ethical issues, an effort which will be continued by the EPC throughout the final months of the project and even beyond its time.
- The project should also continue the dialogue with different actors of the think tank community to ensure that the framework will be applicable for all organisational forms of think tanks.
- Participants were split on whether it is better to use the term 'independence' or whether a different term such as 'intellectual autonomy' fits better. The project needs continued discussions on this issue.
- The major open question concerned the enforcement of ethical standards, which will be especially difficult in the think tank sector. Project members agreed that at the current state, the incentive for compliance is missing. Several measures which were proposed by the EPC's Discussion Paper already indicated possible ways to set incentives. On this basis, further research will be needed to find the optimal way to incentivise actors to implement the framework.
- In this respect, further efforts should be made to find ways to encourage think tanks to comply with such a code, which are not interested so far. Among peer pressure and getting existing networks and funders on board, an important aspect will be outreach activities during and after the end of the project. The EPC already contributed to this by the publication of an EPC paper, an [op-ed on Euractiv](#), as well as dissemination of the project and its output via social media and its homepage.
- The stakeholder engagement was therefore valuable in discussing an issue which already has been on the projects radar from a think tank perspective and therefore ensuring that the project will ensure to involve the concerns raised by the think tank community.

The finalisation of the framework will take these concerns into consideration to make it as inclusive as possible for all sectors involved. Therefore, the consortium will feed these and other recommendations back to the internal adaptation process to make necessary improvements to the framework.

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## 1. INTRODUCTION

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The PRO-RES project, funded by the European Commission, aims at PROMoting integrity in the use of REsearch results. With the support of a full range of stakeholders, the project seeks to develop a guidance framework fostering the highest standards of research ethics and scientific integrity, covering all non-medical sciences including finance and economics.

The guidance framework has been constructed as a practical guide supporting interested parties in achieving reliable and trustworthy research. It takes the form of an online interactive ‘platform’ guiding the user through the issues and concepts to valued sources and archived documentation related to good practices in research. Consisting of three pillars, an accord, a toolbox and resources, the framework aims at being comprehensive in targeting all actors from new and experienced researchers, to policymakers, their advisors and regulators and funders.

Throughout the project, the consortium has entered two rounds of stakeholder activities to draft and further develop the framework. The project partners have engaged with critical stakeholders and expected end-users of the tools such as universities, think tanks, policymakers and their scientific advisors, science advisors and communicators, journalists, NGOs, and practitioners. After the first round of stakeholder engagement was realised with a series of workshops and roundtables, entered the second round of stakeholder engagement in 2020, testing and further developing the draft framework with numerous stakeholders (see Deliverable 2.3).

In many respects, 2020 has been a remarkable year for the project. Firstly, the Coronavirus pandemic has forced the project to adapt its approach to the new circumstances. Project partners moved their activities exclusively online. Furthermore, the project was able to adapt to new challenges with respect to the elaboration framework itself. During summer 2020, the project carried out 63 interviews with stakeholders from all across Europe. While contributing to these interviews, the EPC organised two online discussions in September and November to complement the second round of stakeholder activities. One of these events was specifically dedicated to an issue that arose throughout the project: special challenges for think tanks to comply to the framework and therefore adjusting the framework in a way that will make it possible for think tanks to implement it.

As the project enters its final stage, this report will draw conclusions on a number of issues. As this framework is not only for academia but for the entirety of prospective end-users, the EPC put specific emphasis on testing the framework with policymakers and stakeholders in Brussels. This report will therefore summarise the recommendations of policymakers related to ‘application’ of the framework. Secondly, this report will summarise the findings of the EPC’s dialogue with fellow think tanks to assess how the draft framework could be made applicable for think tanks and similar ‘evidence-generating organisations’ and not just conventional research performing organisations (RPOs). The recommendations drawn from this report will be used to further develop the draft framework to the final framework, which will be presented during the final conference series next year.

To this end, section 2 will explain in detail how this deliverable will draw conclusions. It will elaborate on the aim of this report, on its methodology and give information about the sample. It will also describe the activities organized by the EPC in the context of this deliverable. Section 3 and 4 will then summarise and analyse the findings of the exchanges with stakeholders in two steps. Sub-section 3 will deal with policymakers’ feedback on the project, the accord and the toolbox, whereas subsection 4 will elaborate on the findings of the EPC’s think tank dialogue and its implications for the project. Finally, section 5 will summarise the feedback and conclude with proposing some next steps.

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## 2. ABOUT DELIVERABLE 3.2

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The objective of Deliverable 3.2 is to summarise the EPC's and project partners' findings from its exchanges with policymakers and think tankers in Brussels and across Europe. Exchanges were held in two rounds throughout the project time. The aims of this report are therefore twofold:

1. Summarise and analyse the policymakers' feedback to the PRO-RES framework and its usability
2. Summarise and analyse think tanks' feedback to the PRO-RES framework and the possibility of its implementation for think tanks.

Different goals call for differentiation as well as different methodologies in their analysis. Both issues will therefore be analysed separately in this report. The following sections will introduce the aims in more detail and explain the methodologies and samples used for the analysis.

### 2.1 POLICYMAKERS' FEEDBACK TO THE PRO-RES FRAMEWORK

The EPC will summarise and analyse the exchanges and recommendations from policymakers through its activities in the project and draw some recommendations related to the application of the framework.

To do so, the EPC can rely on several activities carried out in the context of the PRO-RES project. In the first round of stakeholder activities, the EPC organised two workshops in November 2018 and June 2019. Both workshops involved many diverse actors, including university representatives, university researchers, think tankers, CSOs, funding organisations, policy advisors and policymakers. A total of 52 stakeholders participated in the two workshops organised by the EPC, 12 of which were policymakers from the European institutions as well as national and regional institutions. In addition, the EPC was able to make use of the exchanges with several policymakers during the PRO-RES midterm conference. Furthermore, the second round of stakeholder activities were also used for this aim. Five policymakers were interviewed by the EPC and other consortium members in the context of the interview series, two further representatives of European institutions participated in the EPC's third workshop on think tanks and a final public exchange in November 2020, which focused on the effects of COVID-19 for ethical and evidence-based policymaking. In addition to that, the EPC exchanged with policymakers in other areas, for example, working on issues like strategic foresight and better policymaking, which partially helped in drawing conclusions for this report by giving the important context of the European institutions' agenda.

The EPC could draw upon its large network of stakeholders from European, national and local institutions to fulfil those tasks. Furthermore, the EPC team was able to expand its network with two mapping exercises at the beginning of the project and in 2020. Whereas the first mapping was used to get a comprehensive overview of actors involved in the matter in the EU institutions, the second mapping exercise enabled the consortium to expand its network to those actors who joined the institutions or changed positions within the institutions in the context of the new politico-institutional cycle. The EPC could therefore draw on an extensive and up to date network of contacts to deliver on its tasks in the framework of the PRO-RES stakeholder engagements.

Due to the different nature of activities, this report will draw on the qualitative analysis of several output formats. It will include workshop minutes, interview scripts as well as video material. Also, background notes from other meetings will be used for contextualisation. In the end, the aim is to get a comprehensive picture of the recommendations of policymakers in all project activities carried out by the EPC and other consortium partners.

## 2.2 THINK TANKS' FEEDBACK TO THE PRO-RES FRAMEWORK

An important finding from the first round of stakeholder activities was that different research actors have different constraints when trying to implement a framework such as the PRO-RES accord. In this context, it was found that especially think tanks were not able to agree with all principles of the first draft framework, as they operate in a structurally different environment than academic organisations.

In this context, the project put specific emphasis on the engagement with the wider think tank community in the second round of stakeholder activities to explore how the PRO-RES framework could be adapted to meet the needs of non-academic research entities and what measures would promote implementation and compliance.

To this end, the EPC has considerably contributed to the drafting and adaptation of the PRO-RES framework drawing from its own experience and the exchange with the sector over years. Furthermore, additional activities which were not yet foreseen in the grant agreement were carried out by the EPC, including the extensive dissemination in the think tank sector and the general audience. The latter contained the publication of an EPC Discussion Paper, an [op-ed on Euractiv](#), as well as dissemination of the project and its output via social media and the EPC homepage.

Based on the exchanges of the first round of stakeholder engagement, as well as on the EPC's long engagement with the think tank sector in several informal fora and desk research, the EPC team analysed and discussed the constraints for think tanks when it comes to ethical standards in research. The exercise culminated in a [Discussion Paper](#) by EPC Chief Executive Fabian Zuleeg on the challenges for think tanks, the differences between academic and think tank sectors as well as possible avenues for improvement solutions and the role of PRO-RES in it. In a second step, this paper was discussed with 29 fellow think tank representatives in an online workshop in September 2020. The desk research, as well as the online exchanges will build the basis for the analysis in this report. It will be supplemented by further informal exchanges with the community and exchanges with think tankers in the context of the PRO-RES midterm conference.



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## 3. RESULTS OF THE INTERACTION WITH POLICYMAKERS

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During the exchanges, stakeholders gave important insights and recommendations for the PRO-RES project and the framework. In three parts this chapter will therefore look at their feedback on the project, the accord and the toolbox.

### 3.1 FEEDBACK ON THE PROJECT

Stakeholders from European institutions acknowledged that the PRO-RES project makes valuable contributions to the debate around and the challenge of evidence-based policymaking for several reasons. There are already numerous initiatives and institutions that work on this issue, for example in the Commission, the OECD, the Council of Europe and in the UN context. However, as one stakeholder noted, one still “cannot assume that research is done under ethical guidelines”. Whereas there are black sheep in all sectors, non-medical science is an especially important case as, unlike for medical science, there is no universally applied framework in this area.

This is where the major value for this project, but at the same time its big challenge lies: to design a framework that is applicable for all non-medical sciences, a framework which is applicable to the different forms of research and the different actors in research will therefore be the big asset of this project and this framework, he suggested.

However, another stakeholder noted that there is a divide between politics and science. As the main objective of this project is to “determine how to provide policymakers with research to help them make the right decisions”, the project must bridge the divide between politics and science. The majority of researchers, the stakeholder asserted, do not seek to guide politicians but to empower true knowledge. On the other hand, decision makers are never bound to evidence alone, but – in democratic societies – are primarily bound to their electorate. The two positions are therefore very difficult to align.

In this context, the PRO-RES framework could make a valuable contribution for both researchers and policymakers, as it can “potentially be of use to [institutions’] grantees in non-medical research and as such, [and] be included in the work of [the institutions’] experts in their support to the grantees”, as one stakeholder working in the European institutions noted.

Finally, PRO-RES was identified as an important forum for exchange in these critical times. As one stakeholder explained, “the COVID-19 crisis has shown to us how ‘science in action’ works, especially concerning science advice”. It provided us with live data of what happens in member states and institutions with respect to policy advice and showed “where policymakers turn for evidence, legitimation and ideas in times of crisis”. It will be crucial to learn from those experiences, and PRO-RES makes an important contribution in this respect. As he explained, we could see how the initial response from decision makers to listen to virologists only did not produce effective results. “One came to the conclusion that this is not good enough, that more sectors are needed to be involved, especially the sociological and economic spheres”. However, as argued earlier, a unified framework for those non-medical sectors is still missing – a gap that the PRO-RES project seeks to fill.

### 3.2 FEEDBACK ON THE ACCORD

Stakeholders generally reacted positively to the PRO-RES accord but pointed out a few issues which could still be improved. All in all, this feedback was along the lines of the feedback gained from the second round of stakeholder engagement (see Deliverable 2.3), but policymakers’ feedback gave significant insight into the internal processes in European and national institutions.

Stakeholders mentioned several times that the PRO-RES accord lays out principles which are familiar and already promoted by their own institutions. It was pointed out, however, that some member states do not have a national equivalent. Therefore, the PRO-RES accord could be useful especially to those countries.

In the end, however, the challenge will be to get institutions to endorse and implement the framework. Especially the implementation of the accord will be extremely difficult to achieve, one stakeholder said. As a possible solution, another stakeholder suggested that the key will be to seek the support of big umbrella organisations and institutions. If it was endorsed by umbrella organisations, it would make it much easier for the accord to be endorsed by single organisations as well.

Two specific recommendations were made by policymakers to improve the accord. Firstly, it was pointed out that the term “non-medical research” seems not appealing enough. In the end, a negative characterisation is much less relatable than a positive one. “The term ‘non-medical research’ might also be perceived as too broad or encompassing”, one stakeholder mentioned. Finding a new way of defining the target group in a positive way would therefore be useful.

Furthermore, it was suggested that the statement could be more concrete in explaining some of the terms mentioned in the accord. In light of the current “complex debate on how science can best be used to improve policy, and [...] how policy and decision makers can ground their decisions on scientific advice and data”, it would be useful to define more clearly what the accord means by ‘rational policy actions’ or “how independence and integrity can be respected to avoid the use of biased or misleading evidence”. Also, other terms of the statement could be explained more clearly, the interviewee pointed out. “Rigorous and clear statements are crucial to allow the potential users of this accord to fully understand its purpose, added value and applicability in their work, beyond the already existing frameworks”, he noted. It was recognised, however, that this could be difficult to achieve as the objective of the accord statement to be short and simple should be followed as well. A good compromise between being clear and being short will be nearly impossible.

Stakeholders acknowledged that the PRO-RES accord could be beneficent for a variety of organisations and institutions. Yet, one interviewee noted that for the European institutions, the critical point is “to have a track record of good ethics”. Trust building over time is therefore one of their key evaluation criteria. In this context, the accord could be for many organisations “a starting point of a good track record, a good first step”. In the end, however, implementation will be key. And in this context, transparency is of utmost importance, the policymaker said: the more information institutions and the public has, the better. It is therefore key that the accord fits together neatly with the rest of the framework – especially with the toolbox.

### 3.3 FEEDBACK ON THE TOOLBOX

The toolbox will be a crucial element of the framework, policymakers asserted. In all efforts connected to ethical policy-advice, transparency will be key, one interviewee said. The toolbox will contribute to exactly that. Also, in more concrete terms, the feedback on the toolbox was overall positive, and stakeholders offered valuable recommendations on how to improve it even further.

Stakeholders agreed that the toolbox offers a valuable and comprehensive set of ethical questions. The Commission already uses similar toolbox approaches in other areas, so that a toolbox on ethical research would be welcomed, one respondent noted. Once again, the challenge will be to find a “one size fits all model” for all research providers and institutions, but in its current version, the toolbox already “offers a very thorough list of questions that cover a wide range of dimensions on conducting research”, another policymaker noted.

Although the Toolbox already looks comprehensive, it will be useful “to test them for feasibility and attractiveness on different cases”. It is suggested to have three to five test cases on the application of the toolbox, which will then be analysed to adapt it again. As one interviewee noted, it does not seem that any ethics-related question is missing in the toolbox, but test cases will help to get certainty on this issue. The PRO-RES project already committed to designing several case studies to exactly that end.

A couple of further, more concrete recommendations were made to improve the toolbox further. One suggestion for improvement that was voiced by a few decision makers was that some issues should be explained more concretely. For example, it was not entirely clear who is expected to fill the toolbox or who it should be ‘submitted’ to. The “explanatory notes in each section can be handy to guide the researchers”, but an introduction which clearly states “the intended audience/users of this toolbox, followed by simple instructions on how to read/use it could be useful”, as one stakeholder suggested. More concrete explanations on that level could make it easier to understand how the toolbox could work in practice, another stakeholder agrees. At the same time, he also noted that the case studies will already bring some clarity in this respect.

Another issue which was raised by several policymakers was the length of the toolbox. “Any material or document to be read by policy and decision makers who have very limited time should strive to be short and concise, with clear and specific points”, one stakeholder noted. At the same time, decision makers felt that all those questions are valid, “but they are also huge questions”, which could potentially be answered in many pages. A selection should therefore be made. Among the suggestions from policymakers were, therefore, to either only select only the most crucial set of questions or to divide between important main questions and optional questions. This will be the most difficult task, a decision maker noted, because all of the questions which are currently part of the toolbox are valuable – but practicability will need to be in the centre of the toolbox approach. As noted previously, transparency is critical when it comes to the toolbox. However, as the decision maker noted, “too much information is not helpful either: One way of being *un-transparent* is drowning people in information. In this sense, too much information, so much red tape, that no one reads it, is also un-transparent”. Improving readability, while at the same time keeping the most crucial questions in the toolbox is therefore of utmost importance.

Hand in hand with this is the question of how the toolbox could be designed to make it as attractive as possible. This is not an easy task, as stakeholders agree: “a simple checklist might be the most easy-to-use and straightforward format, but not the most appealing if you combine it with online tools”, one policymaker noted. There are already a number of toolboxes and checklists out there, so creativity and “interactive ways of presenting the Toolbox might help to overcome a certain weariness towards such tools.” Others agreed and highlighted that this also refers to the question of promotion. It will be important to promote the toolbox “at the right places”, such as philanthropic foundations Academies of Science and others. This aspect will be critical to encourage researchers and institutions/organisations to use the toolbox.

In sum, the toolbox was received positively by policymakers. None of them rejected the idea of a toolbox and nearly all of them supported its design. In its current form, policymakers generally feel, the toolbox can already make a positive contribution when promoted well. Only a few adjustments were recommended, none of which related to the content of the toolbox as such, but rather on making it even better usable.

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## 4. RESULTS OF THE INTERACTION WITH THE THINK TANK COMMUNITY

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Drawing on extensive desk research and its long exchange with the European think tank sector, the EPC published a [Discussion Paper](#) on ethics in think tanks, the main challenges of the think tank marketplace and first recommendations, how think tanks can be encouraged adhere to ethical principles such as the PRO-RES framework.

It argues that it does matter to society whether think tanks conduct their activities in alignment with ethical principles, as they perform an important democratic function in democratic societies in challenging policymakers and contributing to the debate with own ideas and initiatives. Therefore, acting unethically poses the risk of manipulation of the democratic process, policymaking and public opinion. The legitimacy of think tanks and their contributions therefore depend on their ethical behaviour.

However, non-academic research is less clearly defined and takes place in a very different environment than academic research, the author states. To start with, there is not even a clear definition of what a think tank is. Furthermore, think tanks face huge financial pressure to fund their activities. As a consequence, the high competition among actors might disincentivise certain actors to comply with ethical standards. Moreover, the nature of think tank activities makes misbehaviour often harder to detect and to enforce. Finally, COVID-19 might increase the challenges, most importantly as think tank funding will be under pressure by the economic crisis in the medium term.

Therefore, the author argues that “[t]here is a need to reverse incentives and create an ethical framework that benefits those who are willing to abide by it”. He outlines that at the centre of this framework should lie four universal principles which all think tanks should abide:

- Independence
- Multi-stakeholder approach
- Transparency: comprehensive, accessible, transparent by default
- Good Governance: Diversity of funding, adequate governance structures and transparent management

However, the core issue remains how these standards can be implemented and incentivised. To this end, the author calls for a bottom-up approach, in which the sector itself creates ethical guidelines. In this context, core funding should be made conditional to the think tanks’ commitments to the principles set out in the accord. He, therefore, proposes the establishment of a European Alliance of Independent Think Tanks which should draw up those guidelines building on the framework of the PRO-RES project. The Alliance will provide a forum for developing joint activities and common networks, develop training and capacity building and create an independent, global quality label for think tanks. “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”, Zuleeg concludes.

The dialogue with the think tank sector overall confirmed Zuleeg’s analysis and welcomed the recommendations laid out in his paper. In the discussions, four problem areas were identified as especially complicated: (1) the differences between think tanks and the academic sector, (2) the nature of think tank analysis and their work, (3) problems connected to funding, and (4) the definitions of ‘independence’ and ‘transparency’. But the exchange also brought forward several recommendations for creating a framework which will be open for think tanks.

Stakeholders unanimously confirmed the project’s finding that **the nature of think tank research is fundamentally different from academic work and is thus difficult to be kept under the same ethical guidelines**. Think tanks’ analysis is much more policy-driven compared to academic work. Also, many

contributions from think tanks are made in public debates and private conversations with policymakers and are thus not directly published. Thus, the PRO-RES framework needs to take those considerations into account if it seeks to be a universal code.

However, think tanks are generally positive towards an ethical framework – one participant explicitly welcomed the idea to take the PRO-RES framework as a starting point and develop more concrete guidelines for think tanks on this basis. This might even give the sector the chance to refine its status and position when it comes to research methods and ethical standards – especially towards prospective funders, who often do not understand the difference between academic and think tank research, as the participant pointed out.

The most crucial point for the PRO-RES framework, however, is to find a universal set of criteria, which is truly inclusive to all sectors, including the think tank sector. Otherwise, one participant said, “you are applying very strict requirements to organisations, that they do not have the capacity to apply”, as think tanks usually are relatively small organisations. Such strict criteria even might impede think tankers’ work, e.g., as their work is based on access to and trust relationships with policymakers: “if you record the conversation and make them sign a statement, your information might become much less relevant”, says another participant. “The main credential as a think tank”, he adds, “is your reputation and your network. A relationship of trust is of highest importance”.

A second consideration when drafting a framework which is applicable for think tanks is the **large variety of think tanks in the sector**: “Some think tanks are part of a university, thus very institutionalised, others are very much small networks, some even work merely digital, and many Eastern European think tanks are for-profit organisations, as the status as CSO would bring many problems with it.” This makes it hard to find common criteria, which includes all organisations. Other stakeholders agreed with this assessment, pointing out that “think tanks are always local and they are always results of their political circumstances.” It is therefore important to find principles which are applicable in all circumstances as well as to different political environments.

Another issue which was discussed on several occasions during the stakeholder engagement is the **funding of think tanks**. As one participant described, one problem in this context is that funding is becoming more diverse. In his particular case, funding for a project originated from two sources: there was project funding originating from government institutions, with high ethical standards to comply with, bringing tremendous impacts for think tanks in the administrative sphere; as well as requirements of funders such as foundations and corporations which don’t necessarily have any ethical standards. This means the organisation is “double-headed” in funding and its ethical requirements. It was pointed out that “an organisation like a think tank can never be completely independent, as it will always be funded by actors who have a specific interest”, one participant of the exchange noted. The crucial point, however, is transparency as well as independence of thought. **Unlike “independence” in a strict sense, the speaker would therefore prefer a term such as “intellectual autonomy”.**

**Stakeholders, therefore, hold that the key aspect of the framework must be transparency.** One stakeholder noted, however, that transparency does not only refer to funding transparency. Instead, it includes being transparent about your board, about your activities, methods and your internal working methods.

This is also seen as the solution when it comes to think tanks with party affiliation. Some kind of flexibility of the framework is needed here, one participant noted, which does not assume that any political leaning automatically disqualifies you. Again, being transparent about political affiliation is crucial in this respect.

One participant further remarked that the red line is if there are policymakers who use certain research to support a measure they have already decided to do: “when you move from evidence-based policymaking to policy-based evidence-making – this needs to be a clear red line”, he explains.

In the context of coming forward with recommendations, stakeholders generally approved the objective of the project as well as the general implementation of the draft framework. More concretely, stakeholders noted that for some of the issues raised, the **PRO-RES framework could already bring valuable solutions in its current form**. For instance, with respect to independence and transparency, the toolbox offers a solution, as it clearly states the analysts’ intentions and the funding situation.

Furthermore, the initiative to build a think tank alliance was welcomed by stakeholders. One participant noted that there are already some active networks with academics and think tanks, such as the European Policy Institutes Network (EPIN) or Trans European Policy Studies Association (TEPSA). These **networks could function as a vehicle to get more organisations on board and implement a comprehensive framework** with a large number of think tanks.

When setting up such a framework, however, a participant pointed out that it is important to **follow a ‘staggered approach’**: partners should first start with issues such as providing core funding which is tied to signing up for the framework and then continue with other aspects such as the detailed implementation of transparency etc.

The major open question, however, concerned the enforcement of those standards. It will be especially difficult to enforce ethical standards in the think tank sector, as one stakeholder noted: “Probably everyone mentions independence in mission statements, but is it also the case in practice? Who would enforce an independence statement?” Project members agreed that at the current state, the incentive for compliance is missing. Several measures which were proposed by the EPC’s Discussion Paper, however, could contribute to that. Core funding, which is conditional to ethical standards, for example, could play an important role. Media scrutiny will be important as well, another stakeholder notes.

From a project perspective, PRO-RES already seems at the right track in addressing the needs of the think tank community. **All issues which were raised by the stakeholders are issues, that the project has already discussed previously and is now addressing**. The stakeholder engagement was therefore valuable in discussing an issue which already has been on the projects radar from a think tank perspective and therefore ensuring that the project will ensure to involve the concerns raised by the think tank community. The finalisation of the framework will take these concerns into consideration to make it as inclusive as possible for all sectors involved.

In the end, one major shortcoming of the consultation should be noted at this stage: while the exchange was extremely valuable, it could only take into account the voices of those think tanks, who are already positive to follow an ethical approach. The challenge will be to find ways which make those comply with such a code, which are not interested.

The activity was seen as very useful as it constituted a first step towards a more regular and structured conversation between think tanks on ethical issues, an effort which will be continued by the EPC throughout the final months of the project and even beyond its time.

## 5. CONCLUSIONS AND NEXT STEPS

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Both stakeholder activities were useful exercises as they gave valuable recommendations on how to further improve the framework and showed that the consortium is on the right track with its current endeavours and the current draft framework.

The dialogue with policymakers confirmed this positive evaluation and gave several recommendations concerning outstanding questions on the accord and the toolbox. The exchange emphasised the importance of the right balance between concreteness and a short document as well as the need for good promotion of the framework to ensure that it is applied universally. The issue of incentives was raised here as well. Thus, the policymaker dialogue reinforced the findings of the general stakeholder engagement in both rounds and, more importantly, confirmed the projects' course and decisions made with respect to the design and the adaption of the framework.

The discussion with think tanks on their inclusion into the PRO-RES framework was positive as well. Think tankers welcomed the EPC's proposals and gave further suggestions to improve the process. Among them were issues connected to the funding and the nature of the think tank sector and marketplace as well as, similarly to the policymaker discussion, independence and transparency. The exchange brought forward several recommendations for creating a framework which will be open for think tanks.

The consortium will now feed these and other recommendations back to the internal adaptation process to make necessary improvements to the framework. This report will constitute an important document in this respect. In a next step, the final framework will once more be presented and discussed bilaterally with policymakers to ensure its usability for the sector. At the same time, the EPC will continue the dialogue with fellow think tanks and discuss the framework also in this context. Finally, the PRO-RES framework will be presented in a series of final events – both online and (if possible) in small but socially distant in-person meetings.