

Guidelines on Impartiality and Trust in the Research Council of Norway

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1. Introduction

These guidelines have been prepared on the basis of the provisions on impartiality in § 6–10 of the Norwegian Public Administration Act (*Forvaltningsloven*). The provisions apply to employees of the Research Council of Norway, engaged experts, members of the Research Council’s governing and advisory bodies, as well as anyone else who performs service or work for the Research Council, cf. § 10 of the Public Administration Act.

2. Definitions

2.1 The Concept of a Party under the Public Administration Act

The term *party* is defined in Section 2, letter e, of the Public Administration Act as:

Party – a person to whom an administrative decision is directed or who the case otherwise directly concerns. In this context, *person* also includes institutions or organisations – so-called legal persons.

The institution applying for funding (the project owner) will always be regarded as a party under the Public Administration Act. As a rule, cooperation partners or individuals who are directly identified in an application, or for whom one has acted as a supervisor, are also considered parties.

2.2 The Concept of a Party in the Research Council of Norway

The Research Council has specified and extended the concept of a party to also include persons who are identified in an application. This extension implies, among other things, that the rules on automatic disqualification (impartiality) also apply to such persons.

Those defined as project partners under the General Terms and Conditions will be parties to the case, such as R&D suppliers.

It is important to note that there is a clear boundary between a party and someone who has a more indirect connection to the project, for example by contributing funding. Such a person will not be covered by the term “directly concerned” under the Public Administration Act and is therefore not a party. The rules on automatic disqualification do not apply, and the assessment of impartiality must instead be based on discretion.

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A statement of interpretation from the Ministry of Justice, Legal Affairs Department (ref. JDLOV-2012-6628 (Huitfeldt)) states:

“Huitfeldt is on leave from Fafo, which makes the connection to Fafo weaker than if she had been working there. Furthermore, Huitfeldt has, according to the information provided, not held any central or leading position at Fafo. There is therefore no particular identification between employee and employer that would argue for disqualification. By comparison, we refer to the Eide case, where we assumed that Eide had held a ‘fairly central position by having been a department head’ at NUPI. This was a factor that argued for disqualification.”

2.3 Decisions – Individual Decisions / Strategic Decisions

Decisions are resolutions or other actions that have significance for the further handling of a case. This may also include choices not to decide or act.

The provisions on impartiality and trust generally apply to any preparation or decision in a case. A decision involves reaching a conclusion or making a choice in relation to an assessment. Ranking applications in a recommendation and selecting expert reviewers are examples of decisions.

A decision may relate to an individual administrative decision that establishes rights or obligations for a party (for example, granting funding to a project), or a strategic decision that establishes the possibility of later rights or obligations.

An individual decision is one directed at one or more specific persons (Public Administration Act § 2 b), whereas a strategic decision has no clear addressee. Disqualification may arise in relation to both types of decisions.

In the case of strategic decisions, disqualification may arise where it is highly probable that the decision will have concrete significance for one’s own institution/undertaking and/or one’s own opportunity to obtain funding at a later stage. The clearer the likelihood that a decision will have concrete consequences for the allocation of funding from the Research Council to specific applicants, the closer one comes to a situation of disqualification.

The Research Council’s choice of special priority areas will be characterised as a strategic decision. The same normally applies to the allocation of resources between portfolio boards. Individual decisions are made when granting or rejecting an application for funding.

Another important difference between individual and strategic decisions is that the provisions on automatic disqualification (Section 3.1) normally do not apply to strategic decisions, as these are not directed at or do not directly concern an applicant, cf. the concept of a party above.

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3. Assessment of Impartiality

3.1 General

It is emphasised that it is not blameworthy to be disqualified. However, it is blameworthy not to act on the fact that, in certain contexts, one has such a strong connection to a party that one cannot participate in making a decision that affects that party.

3.2 Automatic Disqualification

3.2.1 The Assessment

An employee, expert, or member of governing or advisory bodies in the Research Council, as well as anyone else performing service or work for the Research Council, is in all cases disqualified from preparing the basis for a decision or making a decision in a case:

- when he or she is a party to the case;
- when he or she is related by blood or marriage to a party in a direct line of ascent or descent or in a collateral line as close as siblings;
- when he or she is or has been married to, is a partner of, is engaged to, or is a cohabitant of, or is a foster parent or foster child of a party;
- when he or she is a guardian or authorised representative for a party, or has been such after the case began;
- when he or she leads or holds a leading position in, or is a member of the governing body or corporate assembly of, a public or private undertaking that is a party to the case;
- when he or she is, or within the past three years has been, a supervisor of a party with a view to obtaining a doctoral degree.

3.2.2 Examples from the Research Council's Practice

Relationship by marriage with a party:

A brother-in-law held a leading position in a research institution that was an applicant. Holding a leading position with a party to the case results in automatic disqualification. The Research Council therefore concluded that the person was automatically disqualified.

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Portfolio board member employed by an applicant:

A portfolio board member was employed in one part of a research institute, while the application came from another part of the institute. The member did not hold a leading position and had not been involved in the application. The Research Council assessed that the member could not be regarded as a party and was therefore not disqualified.

3.3 Disqualification Based on Discretion

3.3.1 General Remarks on the Discretionary Assessment

When automatic disqualification does not apply, it is still important to assess impartiality based on the rules of discretion. Various factors must be considered under this category. The key assessment is whether there are other specific circumstances that may undermine confidence in a decision if the person participates in the processing of the case. Among other things, weight must be given to whether the decision in the case may entail a possibility of benefit, loss, or disadvantage for the person themselves or for someone to whom they have a close personal connection.

Employees, experts, or members of governing and advisory bodies in the Research Council, as well as anyone else performing services or work for the Research Council, are disqualified from preparing the basis for a decision, or making a decision in a case, when there exist specific circumstances that are likely to weaken confidence in their impartiality.

In the assessment, particular weight shall be given to whether the decision in the case may entail a particular benefit, loss, or disadvantage for the person themselves or someone to whom they have a close personal connection. Weight shall also be given to whether an objection concerning impartiality has been raised by a party.

The decisive factor is not whether there is reason to believe that the member will in fact act partially, but whether trust in the process may be weakened from an external perspective.

The discretionary assessment must especially consider and emphasise the following:

- personal interest in the outcome of the case
- close academic collaboration, including the significance of co-authorship and supervision
- close friendship
- personal or academic conflict
- personal ownership—shares, etc.

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Requirements of impartiality may be stricter the more difficult, important, and discretion-based a case is, and also when the individual has significant ability to influence the final decision. It is important that no doubt arises regarding the person’s connection to the case or the parties.

Credibility must be assessed from the outside. For collegial bodies such as expert panels, committees, or portfolio boards, it is important that circumstances reasonably perceived to create disqualification are disclosed and discussed. If this requirement is met, it may be of less importance if the body reaches an “incorrect” answer to a difficult borderline question. Openness, which can also be documented afterwards, helps strengthen trust that the matter has been treated responsibly.

It is important to emphasise that openness does not remove disqualification; however, in borderline cases where different views may exist, transparency makes it harder to argue in ways that could lead to undue favouring of external interests. Additionally, other members will be able to evaluate the person’s contributions knowing their connection to the matter, which can help ensure that trust in the decision is not undermined.

3.3.2 Close Academic Collaboration, Including the Significance of Co-Authorship and Supervision

A person who has, or until recently has had, close academic collaboration with someone or an institution that is a party to the case may be disqualified because such collaboration can impair impartial judgement.

Generally, normal professional collaboration does not easily lead to disqualification. Only when the collaboration is particularly close and extensive can this alone raise questions of disqualification. Normal professional collaboration and contact within the same field will not normally result in disqualification.

When considering possible disqualification due to academic collaboration, the nature of the collaboration must be examined (including the closeness of the collaboration) and when it took place (time distance). Collaboration more than three years in the past normally does not cause disqualification, unless it has led to a lasting, close relationship (academically and/or personally). This must be assessed with discretion.

Administrative collaboration will normally not lead to disqualification, even if it has been long-lasting or extensive. To be considered “specific” circumstances, the collaboration must relate particularly to the concrete case, or involve an unusually close and/or long-standing partnership. If the collaboration was active and recent, this is also relevant.

3.3.3 Specific Remarks on Research Collaboration

Research collaboration may have characteristics distinguishing it from other work-related collaboration. Research may be tied directly to individual ideas and independent knowledge

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production, with scientific publications as concrete, measurable outcomes. Thus, research work may be more personal than work in many other settings.

Research collaboration may also make a person less critical of a collaborator’s projects. Given the competition in research—not only for funding but also for reputation—it may matter to a researcher that a collaborator succeeds within the field.

3.3.4 Collaboration in Small Academic Environments

In small academic communities, “everyone knows everyone,” making it difficult or impossible to find an expert replacement without some connection to the case or parties. This raises the question of to what extent practical challenges may be considered in the disqualification assessment. The Ministry of Justice’s Legal Department has commented on this in JDLOV-2000-8596b.

The Ministry states that practical challenges may matter when it is impossible or disproportionately difficult to find another qualified person. The same applies when it is disproportionately costly to use another person. The situation must be assessed concretely, considering how discretionary, important, or difficult the case is, and how long it would take to find a replacement. The process must also meet the requirement of sound administrative procedure.

It is especially important to be transparent about the person’s connection to the matter or parties, and to allow others to respond—for example, by obtaining additional expert evaluations or discussing assessments in panel meetings. The person should not act as rapporteur for the case.

As an example, “competence brokers” may identify opportunities for businesses to join research projects and provide application guidance. General guidance does not create disqualification, but concrete, case-specific guidance may.

3.3.5 Co-Authorship as an Indication of Close Academic Collaboration

Co-authorship may indicate close academic collaboration.

The definition of legitimate authorship appears in the Research Ethical Guidelines for Natural Sciences and Technology (and corresponding guidelines for other fields, cf. etikkom.no).

Where the criteria for legitimate authorship are met, collaboration exists, but this does not necessarily mean disqualification (see general remarks on research collaboration). The number of contributors and the person’s role may indicate whether the collaboration was close enough to cause disqualification. The number of co-publications and publication frequency must also be considered.

Editorial responsibility normally does not create disqualification.

If legitimate co-authorship took place close to three years ago, it may be relevant to examine when the collaboration occurred, since time may pass before publication.

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3.3.6 The Role of Supervisor

A person who served as a PhD supervisor more than three years ago (cf. Section 3.1 f) must assess impartiality based on the remaining criteria. The same applies to supervision for other degrees.

3.3.7 Close Friendship

A close friendship with a party to the case may lead to disqualification. However, the friendship must be genuinely close. Ordinary friendship or collegial familiarity does not constitute disqualification.

A holistic assessment is required because additional connections may exist. Participation in private social gatherings may suggest a closer relationship and thus trigger disqualification. This must be assessed concretely. For example, an invitation to a small 39th birthday celebration suggests a closer relationship than being invited to a large 40th birthday party.

3.3.8 Personal or Academic Conflict

Sharp, direct conflicts may result in disqualification.

A recent or ongoing personal or academic conflict exceeding normal professional disagreement may lead to disqualification. For example, strong negative personal characterisations expressed in public media.

3.3.9 Ownership – Shares, etc.

Ownership of shares in a company that is a party to a case may lead to disqualification unless the shareholding is very small (both in value and percentage). This especially applies where the ownership entails a majority or sole ownership. The concern is greater if the stake is financially significant for the person and the project outcome could determine whether the investment is lost or profitable. Ownership of a few shares in a large company, or a company whose statutes prohibit dividends, will normally not pose an issue.

If close family owns shares in a company involved in the case, this may also lead to disqualification.

The decisive factor is whether the shareholding constitutes a specific circumstance likely to undermine trust in impartiality. Relevant factors include:

- value of the shareholding
- proportional ownership
- importance of the stake to the person's finances
- other personal interest
- nature of the decision
- relevance and magnitude of the company's interest in the case

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Example: In JDLOV-2009-7092, the Legal Department found that a minister and her family’s combined 42.33% ownership meant she was disqualified regarding cases involving the company or its subsidiaries.

The Supreme Court in HR-2024-1036-A provided additional guidance:

“The Supreme Court notes that the Legal Department, in JDLOV-2023-3763, has suggested that a share purchase of NOK 40,000–60,000, following a concrete assessment, may lead to disqualification. The question of whether ownership interests in a company result in disqualification under section 6, second paragraph, first sentence of the Public Administration Act has also recently been considered by an expert committee appointed by the Storting’s Standing Committee on Scrutiny and Constitutional Affairs. The committee, which consisted of Inge Lorange Backer, Ingunn Elise Myklebust and Marius Stub, submitted its report on 30 November 2023. On page 17, the committee suggests that “a shareholding with a market value of up to NOK 10,000 will hardly lead to disqualification unless the case is of extraordinary significance to the company.” On the other hand, the committee considers that “shareholdings with a market value exceeding approximately NOK 50,000 will normally lead to disqualification if the company is a party to or is genuinely affected by the case”

If a person’s employer owns shares in a company applying for research funding, this may also cause disqualification if the decision may significantly influence the share price and thereby affect the employee (e.g., job security). However, the Legal Department (JDLOV-2023-4798) has cautioned against giving too much weight to anticipated share price effects.

Disqualification normally also applies to fully or partly owned subsidiaries (JDLOV-2009-7092).

3.3.10 Direct Competition

If an expert represents a company in direct competition with an applicant company, they will be disqualified. Direct competition arises where two companies offer the same or similar goods/services to the same market. Less direct competition may also result in disqualification if additional factors are present (e.g., strong academic disagreement).

3.3.11 Disqualification Due to Membership in Reference Groups, Advisory Boards, etc.

If a project applying for funding has associated reference groups or advisory boards, disqualification issues may arise when an expert or board/panel member is also part of such a group. The same applies if a colleague of the expert/member is part of such a group.

Membership in such a group does not make one a party to the case, so a discretionary assessment applies. The key factor is “personal interest in the outcome of the case.”

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Since the connection to the project is weaker than if the person had a formal project role, a higher threshold applies.

If the expert/member themselves is part of a reference group:

Two factors individually suffice to establish disqualification:

- financial compensation (e.g., salary) for participation
- if the work is considered prestigious

If neither applies, other personal interests must be assessed.

If a colleague is part of a reference group:

Because the connection is more indirect, disqualification will arise less frequently.

The relationship between the expert and the colleague must first be examined (see Section 5 on colleague-based disqualification). If that relationship does not itself create disqualification, the expert will not be disqualified. If it *can* create disqualification, the question becomes whether the project outcome would entail *particular benefit* for the colleague (e.g., remuneration).

Other relationships (family, close friendship) may also be relevant.

3.3.12 Other Specific Circumstances That May Undermine Trust in a Decision

This includes circumstances that may weaken or appear to weaken professional judgement or compliance with sound procedure, equal treatment, or objectivity.

The question is whether it is highly probable that someone would question a person's impartiality, thereby undermining trust in the decision.

All relevant factors must be assessed in the specific case.

3.3.13 Examples from the Research Council

Members of Advisory Boards

Normally, this role does not lead to disqualification. The person only advises the project and does not receive personal benefit.

Exception: If the project is particularly prestigious or the person receives payment beyond ordinary participation costs.

Close friendship / party objection:

A person had worked with an applicant in several contexts over years and maintained regular social contact, such as attending birthday events. Another party raised an impartiality objection. The Council emphasised the party objection, which showed that outsiders perceived potential bias. The

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combination of the objection and the nature of the friendship constituted a specific circumstance leading to disqualification.

Former cohabitation:

A portfolio board member had lived with a project manager 15 years ago. They had limited contact since and no hostility. This was deemed unproblematic. However, it could be different if the cohabitation were more recent or involved disputes (e.g., over children or property).

Note: Ongoing cohabitation results in automatic disqualification.

Particular interest in the case:

A board member was involved in a national health project and had a special interest in related applications. They were therefore disqualified from assessing those applications.

3.4 Disqualification for Employees at the Same Institution (Colleague-Based Disqualification)

Both automatic and discretionary disqualification may apply. Several factors must be assessed when someone participates in a decision involving applications from their own institution.

University sector

Rectors, deans, and department heads are disqualified from handling applications from their own unit under Section 3.1(e). The same applies to members of the university, faculty, or department boards.

Researchers and professors may often be disqualified from handling applications involving researchers from their own research group or close academic collaborators. Belonging to the same department does not necessarily cause disqualification; relevance of group size and academic relations must be considered.

Research institute sector

Leaders or those in leading positions at an institute are disqualified under Section 3.1(e). The same applies to institute board members.

Researchers may be disqualified similarly to the university sector. Additionally, weight must be given to the significance for the institute if an application succeeds, particularly regarding finances and reputation.

Business sector

Leaders or those in leading positions in a company are disqualified under Section 3.1(e). Company board members are also disqualified.

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Employees may be disqualified when applications involve their own professional environment or close collaborators. Weight must also be given to the significance of the application for the company's finances and reputation.

4. Competition-Based Disqualification

4.1 General Remarks

A person disqualified from one or more applications cannot prepare or decide cases that directly compete with the application(s) for which they are disqualified.

The competition arena consists of all applications competing for the same funds. It must be assessed whether the competition-based disqualification covers all applications. When there are 20 or fewer applications in the arena, the Council normally considers the person disqualified for the *entire* arena. If more than 20, the threshold is higher. The number 20 is indicative only; each situation must be considered concretely.

Competition-based disqualification applies when the decision in the case is highly likely to affect the case for which the person is disqualified, e.g., when rejection of competing applications increases the likelihood of approval of the application linked to the disqualification.

The decisive factor is not whether the person *will* act partially, but whether they *could* reasonably be perceived as having opportunity or motivation to act partially.

4.2 Special Remarks on Experts

When there are 20 or fewer applications in the arena, an expert disqualified for one application cannot assess other applications in the arena, even if applications are processed in multiple panels.

4.3 Special Remarks on Portfolio Boards

If character thresholds or criteria for fund-worthy applications have been set *before* applications are known, applications failing these may be rejected *en bloc*, with all members present.

All other decisions (conditional funding, rejection, reserve listing) require participation only from impartial members. Disqualified members cannot participate, even in packaged decisions.

When expert assessments reveal direct competition between applications, a board member disqualified for one will also be disqualified for the competitors, even where the number exceeds 20.

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4.4 Continuous Processing

If applications are processed one by one without multiple applications having been received, the issue of competition-based disqualification will normally not arise.

If several applications are collected before a 'cut-off' date, impartiality must be assessed in relation to the entire competition arena. What will be decisive is whether there are applications that stand in a direct competitive relationship with one another.

5. Disqualification for Employees of the Research Council

Employees and leaders will at times be disqualified. Everyone preparing or deciding a recruitment must assess whether circumstances may weaken trust in their impartiality.

A disqualified employee may not prepare or decide the case. If a leader is disqualified, decisions cannot be made by subordinates.

New employees recruited from applicant environments will, depending on prior role, generally be disqualified from applications from the previous employer for a period. A waiting period of six months is recommended.

If the employee remains on leave from the previous employer, disqualification may last the entire leave period.

Employees who resign to join a relevant applicant environment are disqualified during their notice period.

6. Case Handling and Procedures

6.1 Declarations

Provisions on impartiality and integrity in the Research Council of Norway shall be sent to those appointed as members of the Research Council's governing and advisory bodies, as well as to experts. The individual signs a declaration confirming that he or she is familiar with, and will comply with, these provisions.

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Experts shall declare whether they are aware of circumstances that render them disqualified in relation to the specific application(s) they have been asked to assess.

Members of the Research Council's governing and advisory bodies shall provide information on offices held and other roles, etc., that are relevant to their tasks in the Research Council.

6.2 Case-Handling Procedures

- Employees, experts and members of the Research Council's governing and advisory bodies, as well as any other person who performs services or work for the Research Council, shall in good time report any circumstances that render, or may render, them disqualified.
- The immediate superior shall determine whether an employee is impartial.
- Whether experts are impartial shall be decided by the Research Council's administration following dialogue with the experts.
- In governing and advisory bodies, matters relating to impartiality shall be raised with the chair of the body. The chair shall confer with the administration. The governing and/or advisory body shall decide the question of the members' impartiality.
- In connection with each meeting, there shall be a standing agenda item at which circumstances of significance for the members' impartiality are raised.
- The assessment of impartiality shall be archived.
- If the impartiality issue is difficult to determine, the administration may raise the matter with the Impartiality Committee, cf. the committee's mandate.
- The requirements for a quorum are set out in the body's mandate. This applies both to the assessment of impartiality and to other decisions.
- The minutes of the meeting shall briefly record that the issue of disqualification has been on the agenda, which circumstances were discussed, and the decision taken by the body.
- A member shall withdraw during the consideration of the question of his or her own impartiality, after first having explained the relevant factual circumstances.
- Under this agenda item, the body shall make a final decision in all matters concerning disqualification requiring withdrawal (cf. section 8, second paragraph, of the Public Administration Act).
- The body must be quorate when considering the question of impartiality.
- If, in an application or within the same set of related cases, questions of disqualification arise for several members, none of them may participate in the decision concerning their own or another member's impartiality, unless the body would otherwise not be quorate. In the latter case, all members present shall participate.
- Where disqualification has been established, the member concerned shall leave the room during the consideration of, and decision in, the relevant case(s). If the meeting is held

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digitally, the member shall leave the digital meeting entirely and log in again once the case has been dealt with. The case must not be discussed in the chat to which the disqualified member gains access upon rejoining the meeting.

- A disqualified member shall not, in cases under consideration by the body, be given the opportunity to pursue his or her own party interests in any other way than other parties (submission of supplementary information, clarifications, etc.).
- The administration may assess impartiality prior to the meeting and facilitate case processing in a manner that seeks, as far as possible, to reduce the consequences of disqualification.
- All board members shall have access to all case documents, regardless of whether they are disqualified or not.
- Another measure for handling disqualification may be to appoint alternate members in advance of the meeting.
- If an employee is disqualified, that person may not participate in all parts of the processing of the specific application or applications that are in direct competition with it. Competitive disqualification must be assessed in accordance with the ordinary guidelines; see Chapter 4.
- Where a manager is disqualified, case officers subordinate to that manager may still participate in parts of the processing of applications, but may not make decisions during the course of the process (for example, selecting subject-matter experts for a specific application). In such cases, decisions must be elevated beyond the relevant department/unit and, if necessary, submitted to an acting director.
- The tasks involved at the different stages of application processing vary in nature, and it is important to clearly identify which tasks involve taking a decision. Below is a schematic overview of the various stages of application processing and which tasks may be performed by a disqualified case officer and by a case officer whose manager is disqualified. The overview is based on the following two situations:
- As a starting point, there are no predefined guidelines for the allocation of funds, meaning that all applications compete with each other.
- Prior to the actual processing of applications, guidelines for the allocation of funds have been established, meaning that applications may be divided into smaller groups in which they compete internally within the relevant competitive arena, but do not compete with applications in other competitive arenas.

The following abbreviations are used for the different task types:

- **T – Facilitate the basis for a decision:** Tasks that consist of facilitating the basis for a decision cannot be performed by a case officer who is disqualified. If the case officer’s manager is disqualified, a qualified case officer may nevertheless perform these tasks.

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- **A – Make a decision:** Tasks that must be characterised as decisions—i.e., that have significance for the further handling of the case—require that neither the performing case officer nor their manager is disqualified.

	Step in the process	Task type	When there are no constraints on the allocation of funds within the overall application portfolio (all are treated equally)	When constraints have been set on the allocation of funds within the overall application portfolio—not all applications compete with each other (e.g., joint calls with sub-themes)
1	Rejection of an application without assessment, i.e., on an unequivocal formal basis	A	Disqualification is only relevant for the application in question	Disqualification is only relevant for the application in question
2	Rejection of an application based on discretion	A	A disqualified case officer (or a qualified case officer with a disqualified manager) cannot assess rejection of the application in question or the other applications <i>if there are fewer than 20</i> .	A disqualified case officer (or a qualified case officer with a disqualified manager) cannot assess rejection of the application in question or the other applications <i>if there are fewer than 20</i> in the relevant batch of applications. A disqualified case officer (or a qualified case officer with a disqualified manager) may reject applications in other application groups than the one containing the application in question.
3	Propose moving an application	T	Competitive disqualification is assessed as above	Competitive disqualification is assessed as above
4	Propose experts in general	Not part of a specific application processing. Eligibility is therefore not an issue.		
5	Propose experts for a specific application	T	Competitive disqualification is assessed as above	Competitive disqualification is assessed as above
6	Selection of experts for a specific application	A	Competitive disqualification is assessed as above	Competitive disqualification is assessed as above
7	Conducting expert assessment using expert panels	T	A disqualified case officer cannot coordinate an expert panel when assessing competing applications.	A disqualified case officer may coordinate an expert panel when assessing applications in a different competition arena than the

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				one in question. This applies even if the same expert panel assesses the application in question.
8	Relevance assessment	A	A disqualified case officer (or a qualified case officer with a disqualified manager) cannot assess the application in question or the other applications <i>if there are fewer than 20</i> .	May carry out assessments in other competition arenas than the one containing the application in question.
9	Administrative recommendation	A	Competitive disqualification means that a disqualified case officer (or a qualified case officer with a disqualified manager) cannot take part in preparing recommendations for projects. If it is completely obvious that the application in question will not, under any circumstances, be granted funding, it will not be competing with the others.	A disqualified case officer (or a qualified case officer with a disqualified manager) may take part in recommending projects in competition arenas other than the one in question.
10	Administrative participation in a grant meeting where applications are handled	T	A disqualified case officer cannot participate in the meeting during consideration of the application in question. In cases of competitive disqualification, the case officer cannot participate <i>actively</i> in the meeting.	May participate during consideration of projects in competition arenas other than the one in question.
11	Sending feedback on the outcome of the application processing	T	A disqualified employee may not <i>sign</i> a feedback letter.	A disqualified employee may not <i>sign</i> a feedback letter.

7. Changes

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19.06.2025: Amendments made by relocating commentary into this new guide.