National Forum on Research Integrity
Position Paper
Research Integrity & Research Ethics

The National Forum on Research Integrity ("the Forum") have discussed the issue of the overlap between ethics and research integrity, in the context of whether it is appropriate for existing ethics committees in research performing organisations (RPOs) to play a role in handling allegations of research misconduct. This paper gives a brief overview of the definitions of research integrity put forward by various international and European organisations, and puts forward the position of the Forum on this issue with respect to the involvement of existing ethics committees in RI procedures.

Research Ethics

An examination of the ethics committees/offices of various Irish RPOs, e.g. UCD Office of Research Ethics, Teagasc Animal Ethics Committee, TCD Faculty of Arts, Humanities and Social Sciences Research Ethics Committee, illustrates the important role that these committees play in promoting and supporting responsible conduct of research within their organisation. However, it appears that the main work of the majority of committees is reviewing research projects involving human subjects/biological samples and research involving animals to ensure that regulations relating to this type of work are adhered to in the performance of the research work.

The European Commission's Horizon 2020 Programme requires all applicants to undertake an ethics self-assessment. The ethics issues identified in the self-assessment include the typical issues of research on humans, human biological samples and animals, but also includes the following:

- Personal Data;
- Research involving countries outside of Europe ("third countries");
- Environment, Health and Safety;
- Dual Use;
- Misuse.

Research Integrity

The National Policy Statement on Ensuring Research Integrity in Ireland[1] is guided by the European Code of Conduct for Research Integrity[2] and the OECD Document "Best practices for ensuring scientific integrity and preventing misconduct".[3] These identify the most serious breaches of research integrity as:

Fabrication of Data	i.e. making up results and recording or reporting them.

[1] http://www.iua.ie/wp-content/uploads/2014/06/National-Policy-Statement-on-Ensuring-Research-Integrity-in-Ireland-2014.pdf
[2] http://www.esf.org/fileadmin/Public_documents/Publications/Code_Conduct_ResearchIntegrity.pdf
[3] http://www.oecd.org/sti/scienceandtechnologypolicy/40188303.pdf

Falsification of Data	i.e. manipulating research, materials, equipment or processes, or changing or omitting data or results such that the research is not accurately represented in the research record.
Plagiarism	i.e. the appropriation of another person's ideas, processes, results, or words without giving appropriate credit, including those obtained through confidential review of other's research proposals and manuscripts.

While Fabrication, Falsification and Plagiarism (FFP) are the most serious examples of misconduct, there are also additional types of poor practices which, while not as serious as FFP in individual instances, are probably much more frequent and therefore (in the aggregate) potentially more damaging to the overall reputation of research and the research community's integrity. These are summarised in the table below taken from the OECD document. Note that this is not exhaustive.

Core "Research Misconduct"	**Research practice misconduct**
• **Fabrication of data** • **Falsification of data** • **Plagiarism** FFP normally includes: - Selectively excluding data from analysis - Misinterpreting data to obtain desired results (including inappropriate use of statistical methods) - Doctoring images in publications - Producing false data or results under pressure from a sponsor	- Using inappropriate (e.g. harmful or dangerous) research methods - Poor research design - Experimental, analytical, computational errors - Violation of human subject protocols - Abuse of laboratory animals
Data-related misconduct	**Publication-related misconduct**
- Not preserving primary data - Bad data management, storage - Withholding data from the scientific community NB: the above applies to physical research materials too	- Claiming undeserved authorship - Denying authorship to contributors - Artificially proliferating publications - Failure to correct the publication record - Including authors without permission
Personal misconduct in the research setting	**Financial, and other misconduct**
- In appropriate personal behaviour, harassment - Inadequate mentoring, counselling of students - Insensitivity to social or cultural norms	- Peer review abuse e.g. non-disclosure of conflict of interest, unfairly holding up a rival's publication - Misrepresenting credentials or publication record - Misuse of research funds for unauthorised purchases for personal gain - Making an unsubstantiated or malicious misconduct allegation

An examination of this table shows that typical ethical issues in research projects (e.g. research on humans, human tissues or animals, use of personal data) fall under the sub-heading of 'research practice misconduct' under the broader heading of Research Integrity. Similarly, the UKRIO *Code of Practice for Research*[4] mentions research involving human participants, human material or personal data and research involving animals as part of a longer list of issues under good practice in research and preventing misconduct.

In contrast, the European Commission's list of Indicators for Promoting and Monitoring Responsible Research and Innovation[5] uses the umbrella term "Ethics" to cover both research integrity and good research practice, and research ethics for the protection of the objects of research. The approach adopted by the European Commission is reflective of how their engagement with research integrity emerged. The relevant administrative unit (Ethics Section) was originally tasked with preserving, ensuring and assessing ethical issues in Framework Programmes. In Horizon 2020, research integrity was added to the portfolio of this section and it was renamed the Ethics and Research Integrity Section. The Commission's approach would not be in agreement with other RI policy documents, including the European Code of Conduct for Research Integrity, which significantly guided the National Policy Statement on Ensuring Research Integrity in Ireland; hence for consistency the Forum will adopt the approach of considering ethical issues in research projects as one aspect of the broader area of research integrity.

Role of Research Ethics Committees in Research Integrity Procedures

Based on the discussion at Forum meetings in 2015, it is apparent that some research ethics committees are currently, on an ad-hoc basis, being tasked with responsibilities in the broader area of "research integrity". Whilst it is clear that existing research ethics committees should play an integral role in assisting their organisation to promote responsible conduct of research, the question discussed here is whether research ethics committees should take part in any investigations of research misconduct.

The OECD document[3] makes specific reference to the use of existing RPO-based ethics committees during investigations of research misconduct.

"*The advantage of this approach is that ethics committees already exist at many institutions, although they are often associated chiefly with the life/medical sciences, and handle matters relating to human experimental subjects and patients. While the work of these bodies is vital, it cannot be assumed that they can handle all cases of misconduct in research. Ethical issues (i.e., questions of right and wrong and fairness) underlie the very concept of misconduct, but the practical adjudication of concrete cases revolves more around the determination of facts and the careful analysis of events, documents and other data records. This, in turn, can be difficult to do without specialised expertise, as well as special-purpose rules, regulations and precedents*."

[4] Code of Practice for Research: Promoting Good Practice and Preventing Misconduct. UK Research Integrity Office, Sept. 2009. Available at http://ukrio.org/publications/code-of-practice-for-research/

[5] Indicators for Promoting and Monitoring Responsible Research and Innovation – report of the expert group on policy indicators for responsible research and innovation. June 2015. EUR 26866. http://ec.europa.eu/research/swafs/pdf/pub_rri/rri_indicators_final_version.pdf

"Extending the mandate of ethics committees to handling cases of misconduct in research should be accompanied by careful analysis and, if needed, modifications of existing rules and procedures."

In their published Procedure for the Investigation of Misconduct in Research,[6] the UK RIO describe three main actors involved in an investigation:

- Named Person – a formally nominated individual who oversees and implements the investigative process, but does not take part in the screening of allegations or in any formal investigation (see below).
- Screening Panel – a panel of individuals (internal and external, if appropriate) convened by the Named Person to decide on the nature of the allegations and whether or not a formal investigation should take place;
- Investigation Panel - a panel of individuals (internal and external) convened by the Named Person to decide whether or not the allegations should be dismissed or upheld, either fully or in-part.

Based on the statement in the OECD document, the Forum has agreed to adopt the policy that existing ethics committees in the RPOs should not take full responsibility for RI investigations. However, the Forum agrees that the members of these committees could take part in the investigative process as members of Screening Panels or Investigation Panels (or equivalent) convened to process allegations of research misconduct.

April 2016
National Forum on Research Integrity

[6] http://ukrio.org/publications/misconduct-investigation-procedure/