

# National Forum on Research Integrity

## Position Paper on Research Integrity Officer Role & Reporting

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The National Forum on Research Integrity (“the Forum”) have agreed the following position paper on the role, responsibilities and reporting mechanisms for the person or persons who could be appointed as the Research Integrity Officer (or equivalent) in research performing organisations (RPOs). This position paper gives a brief overview of international practices in handling cases of misconduct, focusing on the role of Research Integrity Officer (RIO), and concludes with the Forum’s position on the Research Integrity Officer Role in Irish RPOs.

The National Policy Statement on Ensuring Research Integrity in Ireland (“the Statement”)<sup>1</sup> includes the following text about the RIO:

*Research integrity disciplinary issues will be dealt with by a senior official other than the Vice President or Dean of Research (or equivalent) who may be given the title of Research Integrity Officer. The terms of reference for each RIO should be specified by each institution in accordance with its procedures. There may be a need to appoint RIOs on a case by case basis as different areas of expertise or specialism may be required. It should be noted that this will not preclude the Vice President or Dean of Research (or equivalent) in identifying possible cases of research misconduct requiring investigation and notifying the appropriate institutional authorities.*

### International Practices

The OECD document “Best practices for ensuring scientific integrity and preventing misconduct”<sup>2</sup> raises the following questions regarding the “first link in the investigative chain”:

- *Who is the first person/organisation to turn to with an allegation or suspicion? Is there a special office/officer located near the same venue as the person who suspects misconduct? If so, does the person receiving the allegation have special expertise or training?*
- *Is the receiving office/officer someone whose elevated standing (e.g., dean of an academic faculty, high-level official of a science ministry) could discourage a student or other person who is in the lower ranks of the hierarchy? Does the allegation have*

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<sup>1</sup> <http://www.iua.ie/wp-content/uploads/2014/06/National-Policy-Statement-on-Ensuring-Research-Integrity-in-Ireland-2014.pdf>

<sup>2</sup> <http://www.oecd.org/sti/scienceandtechnologypolicy/40188303.pdf>

*to be presented to a person who has authority over the accuser (for example, a departmental chairperson vis-à-vis a graduate student)?*

- *Is adequate information available to the potential accuser? Is there generally accessible information on a web site, for instance, or via an anonymous hotline? Is there someone to consult when merely a suspicion exists, without certainty or definitive evidence?*
- *Are there requirements/restrictions on who can be accused (and be an accuser)? Can anyone come forward with an allegation? Are there restrictions on substance (for example, work outside one's academic field, work not published in a peer-reviewed journal, "opinion"-type work)? Does suspect work need to be published, versus presented in a conference, or mentioned in a conversation?*
- *Are anonymous allegations accepted?*
- *Is there the equivalent of a "statute of limitations" for misconduct allegations?*
- *How does the system deal with frivolous or malicious accusations? Does bringing forward a false accusation itself constitute actionable misconduct?*
- *What is the receiving person's exact role and authority? Does he/she play a mediator role, or just decide the merits of the allegation?*

*The document concludes:*

*Well-intentioned persons who have a legitimate suspicion that misconduct may have occurred should have access to local information and assistance. Recognising that suspicions of misconduct place both accused and accuser in vulnerable positions, the first administrative response should be characterised by sensitivity, confidentiality, objectivity, and fairness. Persons receiving a suspicion or allegation should have the appropriate competence, training and mandate (including links to higher-level authorities, should they be needed). If possible, these persons should have the authority to resolve conflicts that do not merit a full investigative proceeding.*

The UK Research Integrity Office (UKRIO) has published a Procedure for the Investigation of Misconduct in Research.<sup>3,4</sup>

The document clearly outlines the role and responsibilities of a "**Named Person**" in a research performing organisation. These roles and responsibilities are outlined below:

1. *A research organisation should designate a senior member of staff as the Named Person and another member of staff as a nominated alternate, to act in his/her absence. Additionally, the organisation should **nominate senior individuals in the Personnel Department, Finance Department/Research Grants Office**, ideally with some experience of research, who should liaise with the Named Person, to investigate allegations of misconduct in research.*

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<sup>3</sup> <http://ukrio.org/publications/misconduct-investigation-procedure/>

<sup>4</sup> Citing of this Procedure does not constitute an endorsement of the Procedure on the part of the Forum.

2. *The **Named Person** should:*
  - a. *be an individual within the organisation with significant knowledge and experience of research.*
  - b. *have responsibility for:*
    - i. *receiving any allegations of misconduct in research;*
    - ii. *initiating and supervising the Procedure for investigating allegations of misconduct in research;*
    - iii. *maintaining the information record during the investigation and subsequently reporting on the investigation with internal contacts and external organisations;*
    - iv. *taking decisions at key stages of the Procedure.*
  - c. *have a nominated **alternate** who will receive allegations of misconduct in research and initiate and supervise the Procedure for investigating them in the absence of the Named Person;*
  
3. *The Named Person and his/her nominated alternate should not be:*
  - a. *the Head of Organisation;*
  - b. *the Head of Research; or*
  - c. *the Head of Personnel.*

*The document also states that in cases where the allegations are against the Named Person, the nominated alternate should be the first person to receive the allegations.*

*In describing the procedure for investigating allegations of misconduct, the document clearly outlines the role of the Named Person at each stage of the procedure, including whom they should report to, namely the:*

- *the Head of Organisation;*
- *the Head of Research;*
- *the Head of Personnel; and*
- *the Head of Finance.*

**The document makes a clear statement that while the Named Person<sup>5</sup> takes responsibility for convening any investigative panel(s) and nominating representative(s) to those panels,<sup>6</sup> the Named Person must not be a member of, nor seek to influence the work of the panels.**

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<sup>5</sup> In the Irish context , the “Named Person” is the Research Integrity Officer

<sup>6</sup> The Procedure recommends using a Screening Panel to screen allegations and to decide whether to convene a Formal Investigation Panel.

## National Forum's Position on Research Integrity Officer Role in Irish RPOs

Considering the OECD and UKRIO documents, the text within the Statement and the discussion at the 2<sup>nd</sup>-5<sup>th</sup> meetings of the National Forum, the RIO (and nominated alternate) should have the following responsibilities:

- Assisting the organisation to put in place appropriate policies regarding adherence to principles of research integrity and a published procedure for the investigation of allegations of research misconduct against either staff or students, in accordance with the staff and student disciplinary codes;
- Engaging with the organisation on the provision of RI training for both staff and students, but not be personally involved in delivering that training;
- Keeping up to date with national and international practice in the area of research integrity/responsible conduct of research and liaising with RIOs from other RPOs;
- Assisting the organisation in the processing of any instances of allegations of research misconduct against staff or students, namely:
  - receiving any allegations of misconduct in research;
  - taking, in liaison with appropriate colleagues if required, the decision as to whether the allegations pertain to research misconduct based on the definitions in the National Policy Statement on Ensuring Research Integrity in Ireland, and if not, which alternate route the organisation should take to address the allegations, e.g. direct referral to the organisation's disciplinary or other internal processes;
  - initiating the organisation's procedure for investigating allegations of misconduct in research (where the organisation's procedure specifies, the RIO may coordinate the investigation);
  - collating the information record of the investigation and subsequently reporting on the investigation with internal contacts and external organisations where appropriate;
  - Reporting to the Forum Secretariat, on an annual basis, the number of investigations carried out by the organisation, the number upheld and an overview of the types of misconduct observed.

**The RIO will not be involved in deciding whether individual allegations of research misconduct should be upheld. This decision will be made via the organisation's process for investigating allegations of misconduct in research. While the RIO will initiate and, depending on the policy in place at the organisation, coordinate the process, they shall not personally participate in any investigation panels/process nor seek to influence the work or findings of said panels/process.**

The profile of the person to be appointed as RIO should generally be:

- an individual within the organisation with significant knowledge and experience of research, but not the President/Provost, the Vice-President/Dean/Head of Research; or the Human Resources Director;
- have the appropriate competence, training and mandate to perform the role, including the authority to resolve conflicts that do not merit a full investigative proceeding;
- have the links to appropriate higher level authorities within the organisation.

To allow for cases where the appointed RIO has a potential conflict of interest with the complainant or respondent or is otherwise involved in the case, the RPO should also have a formally nominated alternate to whom allegations can be brought directly, or be referred by the RIO. In addition, to facilitate a “no-wrong-door” approach for reporting of allegations, the organisation should inform all staff that any person who brings an allegation of misconduct in research to them should instruct the complainant, in confidence, to bring the allegations to the RIO or their alternate.

The term of appointment of a Research Integrity Officer will typically be between 3 and 5 years and will not normally be held on a full time basis.

*Agreed 8<sup>th</sup> April 2016 by the National Forum on Research Integrity*