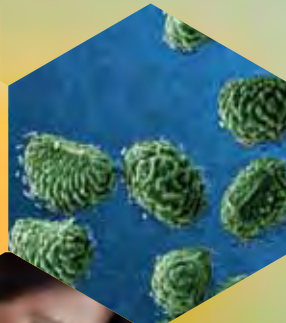




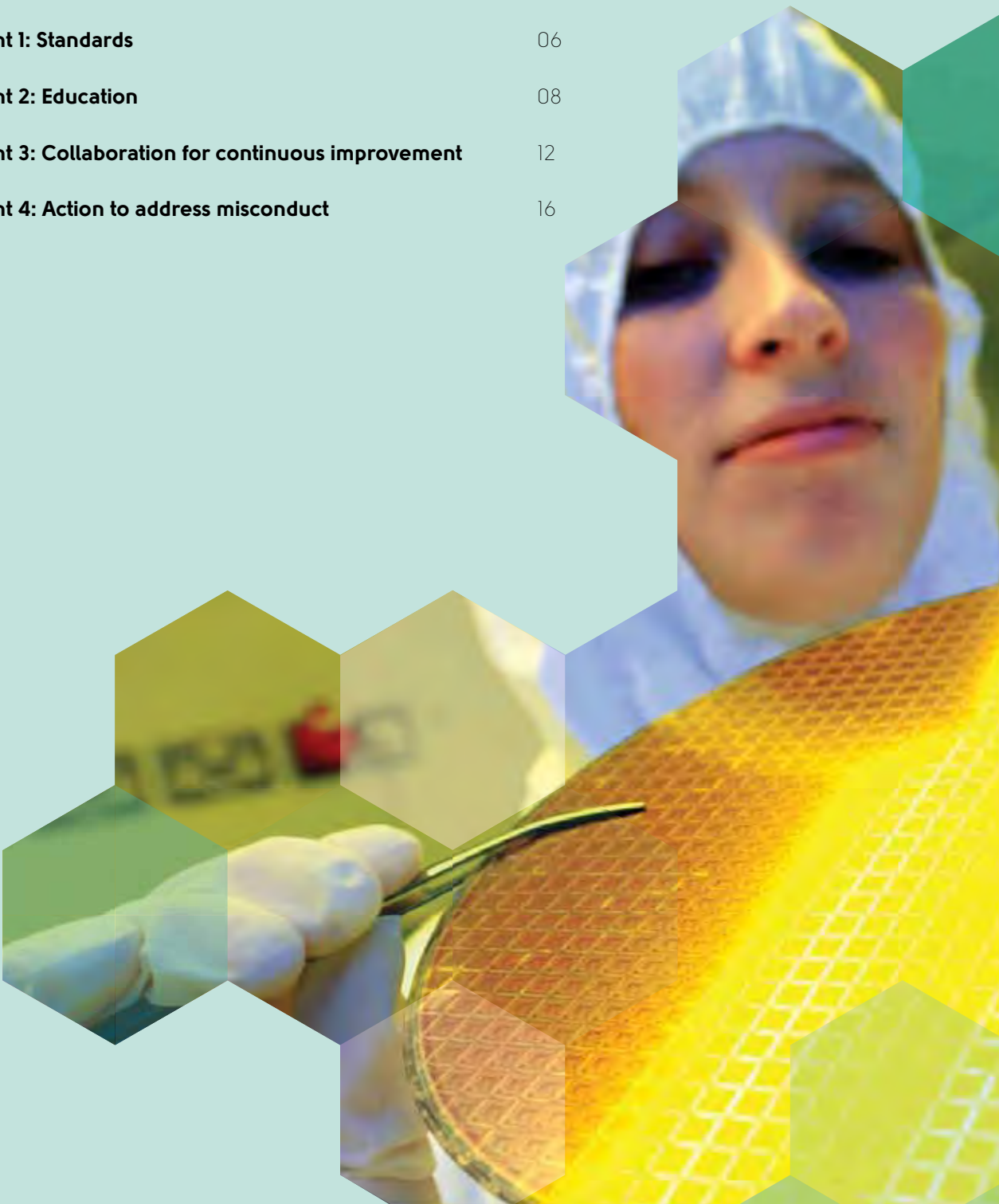
National policy statement on  
**Ensuring Research Integrity in Ireland**





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# Introduction

Research in Ireland has undergone a period of rapid development and transformation over the last fifteen years and has reached the point where Ireland sits close to the world's top research performing nations, in terms of research quality and impact related to its size.

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The aim of this statement is to commit the main organisations in Irish research to the highest standards of integrity in carrying out their research so that partners and other stakeholders, and the international research community may have full confidence in the Irish research system.

The Irish public research system comprises research performing organisations: mainly the Universities, Institutes of Technology, state research organisations and the hospital system along with the research funding organisations.

This policy statement has been developed by the Irish Universities Association (IUA) in collaboration with the following organisations:

- **Health Research Board (HRB)**
- **Royal Irish Academy (RIA)**
- **Science Foundation Ireland (SFI)**
- **Institutes of Technology Ireland (IoTI)**
- **Higher Education Authority (HEA)**
- **Dublin Institute of Technology (DIT)**
- **Enterprise Ireland (EI)**
- **Teagasc**
- **Irish Research Council (IRC)**
- **Royal College of Surgeons in Ireland (RCSI)**
- **Quality and Qualifications Ireland (QQI)**

The Irish Universities Association and its member institutions have long been committed to the highest standards of research conduct and integrity, and individual institutions have procedures in place to underpin this. Similar commitments to upholding integrity have been made by IoTI and its members, and by DIT and other organisations.

However, the transparency of policy and practice will be enhanced by publication of a national statement which clarifies policy and sets out agreed good practice in promoting and ensuring research integrity. This commitment is shared by the universities, IoTI, DIT, Teagasc, RCSI and the main Irish research funding agencies; in particular, the Health Research Board, Science Foundation Ireland, Enterprise Ireland, the Higher Education Authority and the Royal Irish Academy.

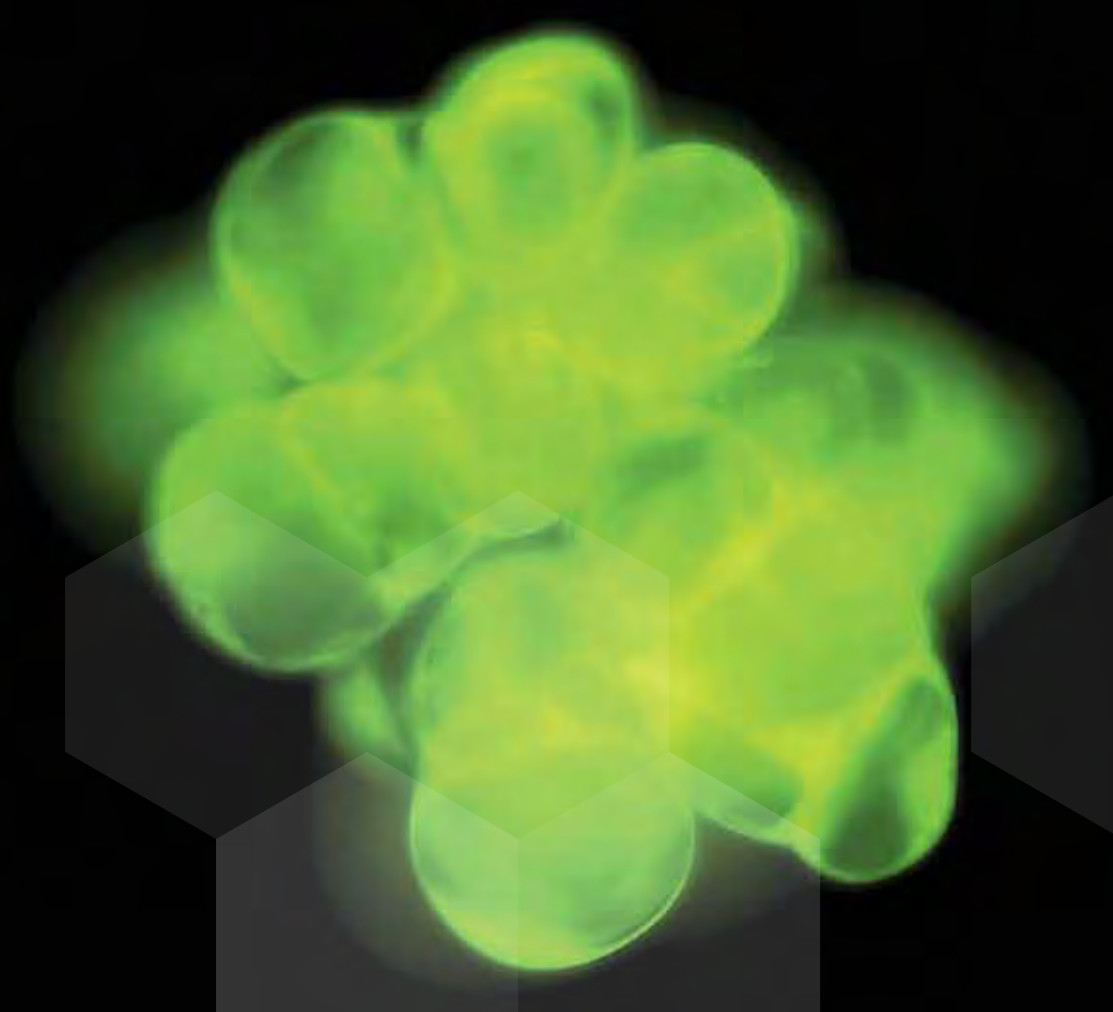
While this policy statement has been developed jointly by the IUA and the listed sponsors, we believe that it provides a robust framework which might usefully be adopted by other research performing organisations in Ireland.

In order to ensure consistency and alignment with agreed international norms and best practice in managing research integrity, the IUA and the national funding agencies endorse the international definitions and principles agreed by the European Science Foundation Members Forum on Research Integrity (2010) and published as the European Code of Conduct for Research Integrity<sup>1</sup>. While making this endorsement, we nevertheless recognise that a research integrity framework is required for Ireland that is appropriate to our specific national circumstances and the Irish legal situation. In considering these issues we draw heavily on the 2010 Royal Irish Academy publication "Ensuring Integrity in Irish Research" which was co-sponsored by IUA, HRB, HEA and SFI.<sup>2</sup> The policy is also influenced significantly by the UK Concordat on Research Integrity (2012).<sup>3</sup>

<sup>1</sup> European Code of Conduct for Research Integrity, European Science Foundation and ALLEA (All European Academies), March 2011, [www.esf.org](http://www.esf.org)

<sup>2</sup> Ensuring Integrity in Irish Research, 2010, [www.ria.ie](http://www.ria.ie)

<sup>3</sup> <http://www.universitiesuk.ac.uk/highereducation/Pages/Theconcordatontosupportresearchintegrity.aspx>



# Commitments to foster and ensure research integrity

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The sponsors of this policy statement make the following commitments:

<b>Commitment 1</b>	We are committed to ensuring the highest standards of integrity in all aspects of our research, founded on basic principles of good research practice to be observed by all researchers and research organisations.
<b>Commitment 2</b>	Education and promotion of good research practice are the foundations of research integrity. We are committed to maintaining a national research environment that is founded upon a culture of integrity, embracing internationally recognised good practice and a positive, proactive approach to promoting research integrity. This will include support for the development of our researchers through education and promotion of good research practices.
<b>Commitment 3</b>	We are committed to working together to reinforce and safeguard the integrity of the Irish research system and to reviewing progress regularly.
<b>Commitment 4</b>	We are committed to using transparent, fair and effective processes to deal with allegations of research misconduct when they arise.

In the sections which follow we expand on these commitments and show how we intend to fulfil them.

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# Commitment 1: Standards

We are committed to ensuring the highest standards of integrity in all aspects of our research, founded on basic principles of good research practice to be observed by all researchers and research organisations.

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The European Code of Conduct for Research Integrity (hereafter, the European Code) specifies eight basic principles that underpin all research integrity and good practice in carrying out research, and which we endorse here. These are principles that all scientific and scholarly researchers and practitioners should observe directly in performing their own individual research, and in dealings with research partners and the audience that receives their research reports. The principles are:

- **Honesty** in presenting research goals and intentions, in precise and nuanced reporting on research methods and procedures, and in conveying valid interpretations and justifiable claims with respect to possible applications of research results.
- **Reliability** in performing research (meticulous, careful and attentive to detail), and in communication of the results (fair and full and unbiased reporting).
- **Objectivity** interpretations and conclusions must be founded on facts and data capable of proof and secondary review; there should be transparency in the collection, analysis and interpretation of data, and verifiability of the scientific reasoning.
- **Impartiality and independence** from commissioning or interested parties, from ideological or political pressure groups, and from economic or financial interests.

- **Open communication**, in discussing the work with other scientists, in contributing to public knowledge through publication of the findings, in honest communication to the general public. This openness presupposes a proper storage and availability of data, and accessibility for interested colleagues.
- **Duty of care** for participants in and the subjects of research, be they human beings, animals, the environment or cultural objects. Research on human subjects and animals should always rest on the principles of respect and duty of care.
- **Fairness**, in providing proper references and giving due credits to the work of others, in treating colleagues with integrity and honesty.
- **Responsibility for future science generations.** The education of young scientists and scholars requires binding standards for mentorship and supervision.

In addition, we recognise that research should always be designed and conducted in accordance with ethical principles, and with appropriate review processes in place to ensure this.

These principles are well aligned with the Singapore Statement on Research Integrity, which was developed as part of the 2nd World Conference on Research Integrity, 2010, and intended as a guide towards a global approach to the responsible conduct of research<sup>4</sup>. They also reflect the principles set out in the 2012 Interacademy Council and the Interacademy Panel report on 'Responsible Conduct in the Global Research Enterprise'<sup>5</sup>.

<sup>4</sup> <http://www.singaporestatement.org>

<sup>5</sup> <http://www.interacademies.net/10878/19787.aspx>





## Commitment 2: Education

Education and promotion of good research practice are the foundations of research integrity. We are committed to maintaining a national research environment that is founded upon a culture of integrity, embracing internationally recognised good practice and a positive, proactive approach to promoting research integrity. This will include support for the development of our researchers through education and promotion of good research practices.

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### Education

Education and promotion of good research practice are the foundations of research integrity. Effective education leads to enhanced awareness of research integrity issues, a positive approach to research integrity as central to the research mission, and a proactive approach to prevention of research misconduct. Where misconduct does arise, a transparent objective approach is needed to deal with it and this is addressed in Section 4.2.

In order to embed the principles and practice of research integrity in research performing organisations, relevant education and training programmes should be in place. This was recognised in Ensuring Integrity in Irish Research<sup>6</sup> where it was recommended that there be:

- Research integrity training for new and experienced researchers.
- Integration of good research practice into teaching at undergraduate and postgraduate levels.

The report goes on to stress that offering research integrity modules as part of undergraduate and postgraduate education is a useful means of promoting research integrity. It recommends that a common module on research integrity principles

and practices be developed and applied across all universities and other research institutions as part of undergraduate and postgraduate training. In addition, there should be specifically tailored education and support for senior researchers and academics who may not be fully aware of issues and responsibilities, and who are centrally influential in defining acceptable research practice for the next generation of researchers.

At both undergraduate and master's level, there is an excellent opportunity to lay the foundations for promoting integrity in research practice. There is already a strong emphasis on the detection and prevention of plagiarism in coursework assessment. Of course this is only one aspect of research integrity.

Arguably the most important period for inculcating research integrity is during doctoral training. This was recognised by the Irish Universities Quality Board (IUQB, now subsumed into QQI) in their PhD Guidelines<sup>7</sup> where they recommend that there be a structured programme of induction for all research students. This should include guidance on:

- Intellectual property issues including conventions on joint authorship
- Ethical considerations and definitions of research misconduct

<sup>6</sup> Ensuring Integrity in Irish Research – a discussion document, Royal Irish Academy (2010)

<sup>7</sup> Good Practice in the Organisation of PhD Programmes in Irish Higher Education, Irish Universities Quality Board (IUQB), 2009





IUQB recommended that doctoral candidates should become familiar with norms and guidelines on professionalism, ethics, plagiarism and the correct usage of quotations, and the importance of the explicit acknowledgment of other's work. They also stressed that the recording of information and data related to their research is undertaken according to good practice in the relevant discipline.

In 2009 the Deans of Graduate Studies across the seven universities agreed a "skills" statement for PhD graduates.<sup>8</sup> This emphasizes the skills that PhD graduates should have acquired during the course of their PhD (either through formal training and/or research experience). Specifically, PhD graduates should understand and apply in their research principles of ethical conduct of research and good research practices, including correct allocation of credit and authorship and avoidance of research misconduct.

The Irish Council for Bioethics also focuses on education in a report on research integrity.<sup>9</sup> Their report provides an in depth review of education programmes and policies. They emphasise that responsible conduct is central to conducting good science. They underline the need to "maximize the likelihood that education in the responsible conduct of research influences individuals and institutions rather than merely satisfies an item on a "check-off" list for that institution".

In light of the foregoing, we are committed to strengthening our efforts to educate students and staff in both the principles and practices underpinning research integrity.

### Data storage and retention good practice

The definition of 'data' for these purposes encompasses the methodology used to obtain results, the actual research results and the analysis and interpretations by the researchers. Primary responsibility for observing good practice in the use, storage and retention of data sits with the individual researcher, supported by the institution, and should follow the principles below:

Data should be recorded in a clear and accurate format. Particular attention should be paid to the completeness, integrity and security of these records.

Data should be stored in secure and accessible form and must be held for a length of time and a minimum period of five years from the date of publication is normally recommended, depending on the type of data, in the absence of an institutional records management and retention policy.

Data should be organised in a manner that allows ready verification either in paper or electronic format. Original data should be authenticated, in order to protect the university (or other research performing institution) and researcher against allegations of falsification of data.

Research data and records may be discoverable in the event of litigation. This means that the research data and records may be accessed by the university (or other research performing institution) and its legal advisers, to determine their relevance to any litigation process.

Research data related to publications should be made available for discussion with other researchers, except where confidentiality provisions prevail. Confidentiality provisions relating to research data and records will apply in circumstances where the university (or other research performing institution) or the researcher has made or given confidentiality undertakings to third parties or where disclosure would involve the unreasonable disclosure of information relating to the personal affairs of any person (including a deceased person) or when confidentiality is required to protect the intellectual property rights. The recently published National Principles for Open Access<sup>10</sup> encourage the deposition of research data in open access repositories linked to publications, whenever this is feasible. This should lead to greater integrity in the gathering, analysis and presentation of data as it may be open to scrutiny by peers, globally.

<sup>8</sup> Irish Universities' PhD Graduates' Skills, Irish Universities Association, 2009

<sup>9</sup> Recommendations for Promoting Research Integrity, Irish Council for Bioethics, 2010

<sup>10</sup> <http://www.iua.ie/wp-content/uploads/2012/10/National-Principles-on-Open-Access-Policy-Statement-FINAL-23-Oct-2012-v1-3.pdf>

## Statutory obligations

Researchers should be aware that under the Freedom of Information Act 1997, a university or other research performing institution is required to allow persons access to documents of the institution (documents which are in the institution's possession) under defined circumstances. Researchers must at all times be aware of the provisions of, and operate in accordance with, the Data Protection Act, 1988 and the Data Protection (Amendment) Act, 2003 which, amongst other things, restricts the usage of sensitive and personal data.

In order to ensure research integrity through compliance with Data Protection legislation, researchers should:

- i Obtain and process the personal data fairly
- ii Keep it only for specified and lawful purposes
- iii Process it only in ways compatible with the purposes for which it was volunteered initially
- iv Keep it safe and secure
- v Keep it accurate and up to date
- vi Ensure it is adequate, relevant and not excessive
- vii Retain it no longer than is necessary for the specified purpose or purposes
- viii Give a copy of his/her personal data to any individual on request

## Enhancing practice

We are committed to supporting the continued enhancement of good practice through the progressive adoption of the following recommendations, which we also commend to all research performing organisations:

Research integrity should be addressed through formal courses, in both undergraduate and graduate modules for students and as part of supervision training for academic staff. The outcome from an education programme on research integrity is to embed a culture of good practice in the conduct of research by students, researchers and staff.

Continuing education on research integrity should also be provided through mentorship by senior investigators responsible for the supervision/training of PhDs and postdoctoral researchers alike.

Staff education should be facilitated as an integral component of continuous professional development, for example, through courses such as the framework for Research Supervisor Support & Development developed with support from the National Academy for Integration of Research, Teaching and Learning (NAIRTL).

The primary responsibility for delivering education and training programmes to their research staff must sit with the individual research performing organisations. However, courses offered through the universities might usefully be made available to those in other state-funded organisations.

Research integrity requirements will be promoted in the schemes of the funding agencies in alignment with the Global Statement on Principles of Research Integrity<sup>11</sup>.



## Commitment 3: Collaboration for continuous improvement

We are committed to working together to reinforce and safeguard the integrity of the Irish research system and to reviewing progress regularly.

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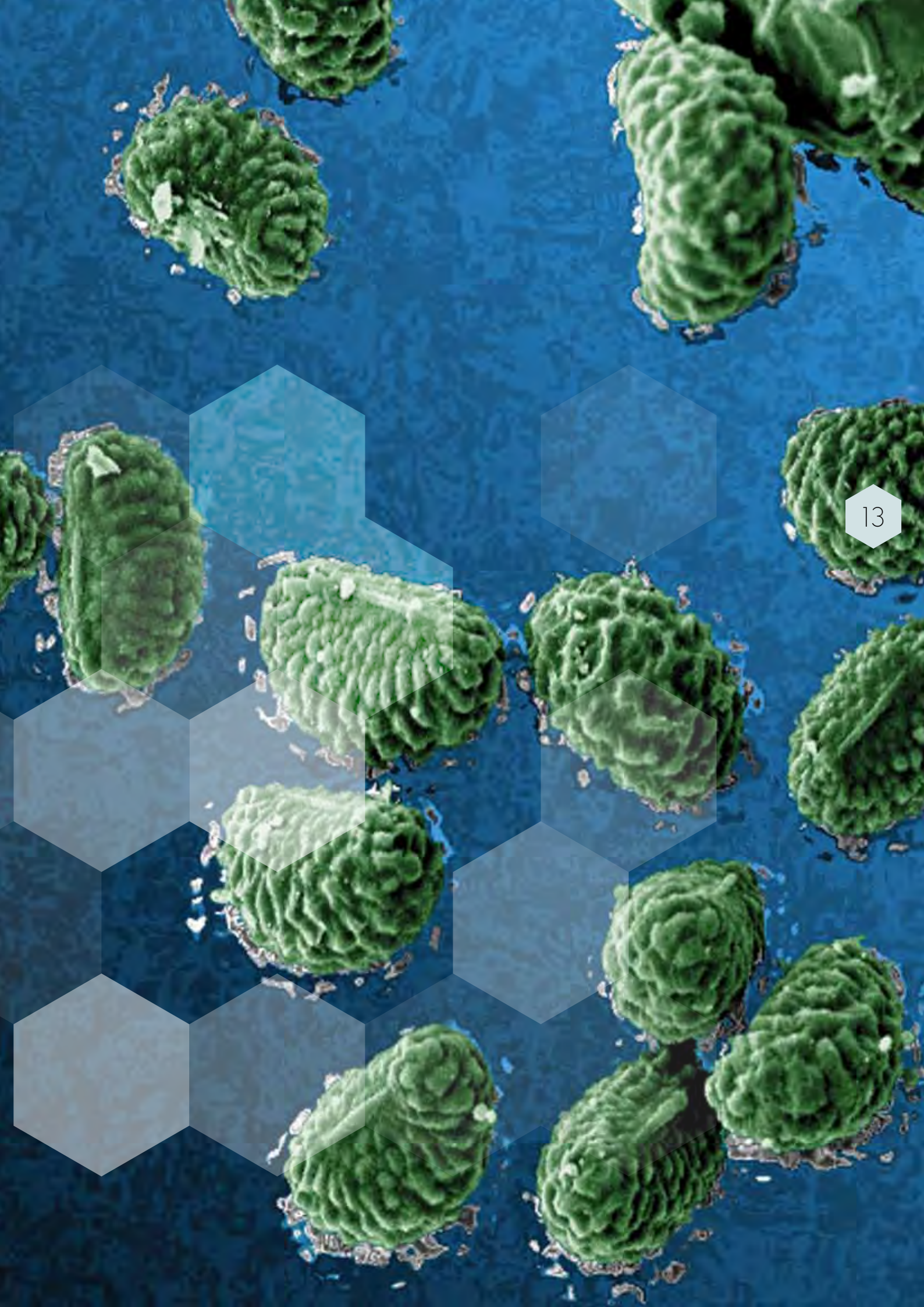
This statement represents a point on a journey towards a strengthened approach to ensuring research integrity in Ireland. To ensure continual development and adoption of good practice, we propose to establish a standing National Forum on Research Integrity. The forum will be established with representation from all sponsors and major stakeholders.

The remit of the national forum will be to:

- Monitor international developments in the sphere of research integrity, and to communicate important developments to Irish institutional stakeholders;
- Monitor and co-ordinate the development of standards in educational programmes to ensure research integrity in Ireland;
- Share knowledge and understanding of good practice based on experience in Ireland and internationally;
- Co-ordinate further development of “Good practice guidelines” appropriate and specific to Ireland as envisaged in the European Code of Conduct for Research Integrity;
- Share experiences on the number and type of instances of research misconduct that have been dealt with through formal mechanisms within the institution.







# Commitment 4: Action to address misconduct

We are committed to using transparent, fair and effective processes to deal with allegations of research misconduct when they arise.

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## Definitions of Research Misconduct

Where the principles and good practice underpinning research integrity are not followed, issues of research misconduct may arise. At the outset, it should be said that research misconduct does not include honest error or honest differences in the design, execution, interpretation or judgement in evaluating research methods or results or misconduct unrelated to the research process. Similarly it does not include poor research per se unless this encompasses an intention to deceive.

As regards the substance of research misconduct, we are guided by the OECD Best practices for ensuring scientific integrity and preventing misconduct<sup>12</sup> (see also Table 1 pg 16). Breaches of research integrity take many forms and can be of varying seriousness. The most serious are:

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

Each one of these comprises an attack on the integrity of the research record and as such, must be vigorously defended against. Fabrication and falsification are the most serious offences that can

be committed, as the development of knowledge itself is undermined. Plagiarism may be seen as marginally less egregious than these two, since the knowledge core is not in itself damaged. However, the corrupting effect on the principle of open communication and sharing of knowledge for wider benefit means that repeated, significant plagiarism must be regarded as extremely serious.

While Fabrication, Falsification, and Plagiarism (FFP) represent the most serious examples of misconduct, there are also additional types of poor practices which, while not as serious as FFP in individual instances, may be present and therefore (in the aggregate) potentially as damaging to the overall reputation of research and the research community's integrity.

These poor practices include but are not confined to:

- Data-related poor practice e.g. not preserving primary data, poor data management and/or storage;
- Publication-related practice e.g. claiming undeserved authorship, denying authorship to contributors, artificially proliferating publications;
- Personal behaviours e.g. inadequate mentoring of next generation of researchers and scholars, inappropriate personal behaviour;
- Financial and other malpractice e.g. peer review abuse, non-disclosure of a conflict of interest, misrepresenting credentials;
- Poor research procedures e.g., harmful, dangerous or unethical research methods.





**Table 1: OECD description of types of misconduct by scientists and scholars**

<b>Core "Research Misconduct"</b> <ul style="list-style-type: none"> <li>• Fabrication of data</li> <li>• Falsification of data</li> <li>• Plagiarism</li> </ul> FFP normally includes: <ul style="list-style-type: none"> <li>- Selectively excluding data from analysis</li> <li>- Misinterpreting data to obtain desired results (including inappropriate use of statistical methods)</li> <li>- Doctoring images in publications</li> <li>- Producing false data or results under pressure from a sponsor</li> </ul>	<b>Research practice misconduct</b> <ul style="list-style-type: none"> <li>- Using inappropriate (e.g., harmful or dangerous) research methods</li> <li>- Poor research design</li> <li>- Experimental, analytical, computational errors</li> <li>- Violation of human subject protocols</li> <li>- Abuse of laboratory animals</li> </ul>
<b>Data-related misconduct</b> <ul style="list-style-type: none"> <li>- Not preserving primary data</li> <li>- Bad data management, storage</li> <li>- Withholding data from the scientific community</li> </ul> NB: The above applies to physical research materials as well	<b>Publication-related misconduct</b> <ul style="list-style-type: none"> <li>- Claiming undeserved authorship</li> <li>- Denying authorship to contributors</li> <li>- Artificially proliferating publications ("salami-slicing")</li> <li>- Failure to correct the publication record</li> <li>- Including authors without permission</li> </ul>
<b>Personal misconduct in the research setting</b> <ul style="list-style-type: none"> <li>- Inappropriate personal behaviour, harassment</li> <li>- Inadequate mentoring, counselling of students</li> <li>- Insensitivity to social or cultural norms</li> </ul>	<b>Financial, and other misconduct</b> <ul style="list-style-type: none"> <li>- Peer review abuse e.g., non-disclosure of conflict of interest, unfairly holding up a rival's publication</li> <li>- Misrepresenting credentials or publication record</li> <li>- Misuse of research funds for unauthorised purchases or for personal gain</li> <li>- Making an unsubstantiated or malicious misconduct allegation</li> </ul>

Reproduced and amended from OECD publication 'Best practices for ensuring scientific integrity and preventing misconduct.' <http://www.oecd.org/sti/scienceandtechnologypolicy/40188303.pdf>



## Addressing research misconduct

Despite the best efforts towards education, promotion of good practice and prevention of misconduct, it is inevitable that some cases of misconduct will arise. When they do there must be an appropriate process of investigation and determination of the offence. The following principles for investigations are substantively based on those set out by the European Code, and are endorsed here as guidance for institutions who will undertake investigations in accordance with their own detailed and individual procedures.

### Integrity of the process

- Investigations into research misconduct allegations must be fair, comprehensive and conducted expeditiously but without compromising accuracy, objectivity and thoroughness.
- Those parties involved in the procedure must ensure that any interests they have which might constitute a conflict of interest are disclosed and managed.
- Detailed and confidential records should be maintained on all aspects of the procedure.

### Uniformity

- Procedures for dealing with misconduct should be spelled out in sufficient detail so that the transparency of the process and uniformity within one domain of jurisdiction from one case to another is ensured.

### Fairness

- Investigation of research misconduct allegations should be conducted in a manner that is fair to all parties and in accordance with relevant laws.
- Persons accused of research misconduct must be given full details of the allegation(s) in writing and allowed a fair process for responding and to have a representative or work colleague present

for any meeting or interview associated with the investigation or disciplinary hearing.

- Proportionate action should be taken against persons found to have committed research misconduct.
- Any action(s) taken should be subject to right of appeal.

### Confidentiality

- The procedure should be conducted as confidentially as possible, in order to protect those involved in the investigation. Such confidentiality should be maintained provided this does not compromise the investigation of the allegation, health and safety, or the safety of participants in research.
- Where possible, any disclosure to third parties should be made on a confidential basis.
- If the organisation and/or its staff have legal obligations to inform third parties of research misconduct allegations, those obligations must be fulfilled at the appropriate time through the correct mechanisms.

### No detriment

- Anyone accused of research misconduct is presumed innocent.
- No person should suffer any unnecessary penalty when accused of research misconduct before the allegation is proven.
- No person should suffer any penalty for making an allegation of research misconduct in good faith, but action should be taken against persons found to have made allegations in bad faith.

## Process

The European Code provides an extensive discussion of the seriousness of poor and questionable practices. In many cases the boundaries between poor practice and serious misconduct may be quite thin, especially if the poor practice is carried out repeatedly by an experienced senior researcher. In some cases, for example in those involving the misuse of research funds or intimidation of junior staff, the offence may be extremely serious, and should be dealt with as such by appropriate procedures within law. However, the offence itself may not constitute research misconduct, since it does not affect the integrity of the research record itself.

For such poor practices, the internal mechanisms of the research community will, in many cases, provide effective remedies without the need for formal investigative actions. However, there are also intermediate categories of misconduct which may warrant more significant intervention.

In general, any response to incidences of misconduct must be proportionate to the seriousness of the misconduct. Specifically, as a rule it must be demonstrated that the misconduct was committed intentionally, knowingly or recklessly. Proof must be based on the preponderance of evidence.

Institutions or organisations protect the integrity of research by dealing properly with instances of misconduct and nurturing an environment supportive of integrity.

In a European context, Irish Universities are quite extensively regulated by the primary national statute, the Universities Act 1997. Since an allegation of research misconduct implies the possibility of sanction up to and including suspension and dismissal, any sanction must be in accordance with the provisions of the Act.

Subsection 25(6) of the Act is of specific relevance and states:

“the University may suspend or dismiss any employee but only in accordance with procedures, and subject to any conditions, specified in a statute<sup>13</sup> made following consultation through normal industrial relations structures operating in the University with recognised staff associations or trade unions, which procedures or conditions may provide for the delegation of powers relating to suspension or dismissal to the chief officer and shall provide for the tenure of officers.”

In practice, this means that any procedures for disciplining a staff member of a University must be specified in the statute of that University. Because of the possibility of sanction, this statutory process is the only process through which an employee of a University may be disciplined for any reason.

Similar legislative provisions or statutes, for example the Dublin Institute of Technology Act 1992, or the Institutes of Technology Act 1992, will apply in other public research performing organisations. With due regard to the statutory obligations upon institutions and staff, we wish to highlight the following specific commitments in regard to process:

<sup>13</sup> i.e. a university statute

## Commitments for Action

### A. Prompt Action

We are committed to using proactive management and, where necessary, disciplinary procedures to quickly and effectively address research misconduct with due reference to the relevant institutional statutes.

### B. Avoidance of conflict of interest

We will take steps to ensure that any conflict of interest issues arising are addressed. In this regard, research integrity disciplinary issues will be dealt with 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 Research Integrity Officer should be specified by each institution in accordance with its procedures. There may be a need to appoint Research Integrity Officers 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 for Research (or equivalent) in identifying possible cases of research misconduct requiring investigation and notifying the appropriate institutional authorities.

### C. Transparency and objectivity – panels of experts and reporting

We are committed to transparency of the process with due regard to the statutes and the requirements of natural and constitutional justice. We also recognize that effective investigation of research misconduct may give rise to issues of a detailed scientific and technical nature. For these reasons we propose that, with the assistance of the Royal Irish Academy and similar bodies, an independent standing panel of up to eight international experts be established for each of the fields of research listed below (up to 64 experts across all fields).

As previously indicated, breaches of research integrity can vary significantly in their seriousness. Where the suspected research misconduct is such that it warrants application of a full formal disciplinary process, members of the relevant panel may be called upon by institutions to assist them<sup>14</sup>.

- Physical and chemical sciences
- Life sciences
- Mathematical, information and communication sciences
- Arts and humanities
- Social sciences
- Engineering
- Medical sciences
- Veterinary sciences

### Reporting

It is recognised that a funding body supporting a programme of research has a very specific interest and role in ensuring the integrity of the conduct associated with that research. The institutions are committed to reporting the findings of any proven cases of research misconduct arising from a formal disciplinary process to the relevant authorities including, for example, funding bodies and publishers. However, if the allegation of research misconduct is of a particularly serious nature and materially affects the running of a programme of research, it may be a contractual stipulation, or considered prudent in the circumstances, that the research performing organisation should advise the funder of the situation at an earlier stage. It is also envisaged that where a funding agency raises concerns regarding misconduct with a research performing institution as a result of its evaluation processes or arising from its post-award management of a funded programme, that these concerns should be dealt with by the institution in a manner similar to all other received allegations.

<sup>14</sup> Subject, in the case of individual institutions, to this being compatible with the provisions of the relevant university statute. Institutions may wish to review their statutes in this regard.

#### D. Sanction and Appeal

The purpose of a formal disciplinary action (e.g. disciplinary hearing) is to examine and evaluate all relevant facts to determine whether research misconduct has been committed, and to identify the responsible person(s) and seriousness of the misconduct. This will be carried out as a disciplinary action, as specified in the statutes of the employing institution.

The findings of the formal process will be reported in accordance with the statute, as will the recommendation on appropriate disciplinary measures to be taken.

There will be provision for an appeal against the determination and sanction, and this appeal will also be carried out under the statutes of the employing institution.

As a guideline, where a formal investigation has been carried out by an investigation committee, and where a disciplinary sanction has been imposed, then an appeal may be made in accordance with the statute.

#### Conclusion for Policy Statement

To conclude, the sponsors of this policy are committed to the highest standards of integrity in carrying out their various research missions, and committed that the work of all of our research community is based firmly on principles of honesty, impartiality, fairness and responsibility. That is manifestly the case at present, and this policy statement will build on the current strong foundations in place in all the institutions to further strengthen the integrity of our national research system in a co-operative way while fully respecting the individual identities and responsibilities of the institutions.

## Acknowledgements

The policy statement was developed by a working group that included the Universities, IoTi, the Royal Irish Academy and the major funders of research in Ireland, including HRB, SFI, EI, HEA, the Irish Research Council and QQI.

Other stakeholders were invited to comment on a draft statement over the period January-April 2013 and feedback received informed the final statement. The working group wishes to thank all those who were able to participate and contribute.

The working group members were:

- Maura Hiney - Health Research Board
- Alan Donnelly - University of Limerick
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- Marion Boland - SFI
- Steven Simpson - SFI
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- Derek Sullivan - Trinity College Dublin
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- Caroline Brennan - University College Dublin
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- Sinead Riordan - Royal Irish Academy
- Andrew Brownlee - Institutes of Technology Ireland
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- Ray O'Neill - National University of Ireland Maynooth (Chair)
- Anita Maguire - University College Cork
- Conor O'Carroll - Irish Universities Association
- Ned Costello - Irish Universities Association



