

Policy for Dealing with Alleged Research Misconduct in Applications Made to the HRB

Background

The HRB expects all of the researchers that it funds, both clinical and non-clinical, to adhere to the highest standards of integrity in the crafting of their funding applications. The HRB takes allegations of research misconduct very seriously and requires Host Institutions to have policies and procedures for handling of allegations of research misconduct. The HRB has clarified its expectations of these policies and procedures in its *Guidelines on Handling of Allegations of Research Misconduct*.

Scope

This document is based on the BBSRC policy¹ and the Office of Research Integrity Guidelines² and outlines the specific HRB policy for handling alleged research misconduct in its funding process. This would primarily include (though might not be confined to):

- fabricating or falsifying data used to support a grant application
- plagiarism within a grant application.

The Federal Policy on Research Misconduct³ clarifies the meanings of fabrication, falsification or plagiarism as follows:

- *Fabrication* is making up data or results and recording or reporting them
- *Falsification* is manipulating research materials, equipment or processes, or changing or omitting data or results such that the research is not accurately represented.
- *Plagiarism* is the appropriation of another person's ideas, processes, results, or words without giving appropriate credit.

Research misconduct excludes honest error or differences of opinion and poor research unless this encompasses the intention to deceive⁴.

Policy

Once a communication is received by the HRB about alleged research misconduct involving an application for funding, the following procedure should be followed:

Initial Action

1. The relevant Programme Manager should be informed immediately.
2. The Programme Manager should acknowledge receipt of the complaint and, if this has not already been received, request a written description of the allegation from the complainant (person(s) making the allegation).
3. The appropriate information about the allegation and the relevant documents as well as any other relevant information should be collected by the Programme Manager.
4. At this stage contact with all parties involved in the allegations should be through the Programme Manager.
5. At all stages, it must be made clear to all parties that it is not the HRB's role to carry out inquiries. It is up to the employer of the respondent (subject(s) of the allegation).

Contact with the Complainant

6. The Programme Manager will write to the complainant about the process and explain the following:

- (a) It is the responsibility of the institution employing the respondent to undertake the enquiry and, if warranted, a formal investigation. The HRB's role is to see that these procedures are adhered to in a timely manner.
 - (b) The documents involved in allegations of misconduct are not public domain as they are applications to the HRB and are therefore confidential with restricted access. The employer/institution concerned will need to see copies of these confidential documents if it is to conduct an inquiry. The complainant must, therefore, give written agreement to the HRB that such documents, including the letter of complaint, can be sent to the investigating institution. (See paragraph 8).
 - (c) The complainant should understand that without this agreement an inquiry will not be possible.
 - (d) It should also be understood that it may be difficult for the complainant to remain anonymous. Moreover, the complainant would not be able to argue their case if their name is withheld from the inquiry.
7. Where the application under suspicion has been received from a number of co-applicants, it is the institution employing the named Principle Investigator that will be expected to conduct an inquiry into the allegations.

Contact with the Institution

8. Where a complainant has given explicit agreement to the HRB to alert the institution, for their name to be disclosed to the institution, for a copy of the letter laying out the allegation and the suspect proposal as submitted to the HRB (whether funded or not) to be sent to the institution, the Programme Manager will write to the institution, giving the above information, and requesting the institution to invoke its *Procedures for the Investigation of Allegations of Research Misconduct*. The HRB should be informed of the process the institution intends to take and the timescale.
9. It is the responsibility of the institution to inform the respondent (subject of the allegation) that it is undertaking an initial enquiry in accordance with its procedures and in line with the HRB Guidelines thereon.
10. At all stages the Programme Manager must be kept informed of all exchanges of information and contact with all parties involved in the allegation.

HRB Action

11. The initial actions to be taken by the Programme Manager are as follows:
- (a) The starting point should be that the processing of the proposal should continue.
 - (b) If the proposal is fundable, funding should be withheld until the complainant has responded to the Programme Manager on whether they wish to proceed with the complaint.
 - (c) If the complainant confirms, then the next decision point would be the outcome of the institution assessment/inquiry of whether there is a *prima facie* case to answer.
 - (d) If the complainant does not want to proceed and the HRB is content that proper procedures have been followed, then the matter is closed and the funding process continues as normal.
12. Where the institution finds that there is a *prima facie* case to answer, the HRB would continue processing of the proposal and if it is found to be fundable, funding would be withheld until the investigation has been completed.
13. If the allegation is upheld by the investigation of the host institution, the HRB will withdraw the offer of funding to the respondent (if this has already been made) for

the application under dispute, explaining the basis for this decision. The HRB would also need to be informed of what actions the institution is taking against the respondent.

14. Where the institution finds that there is **no case** to answer and/or the allegation is not upheld upon investigation, then the matter is closed and the funding process can continue as normal.

¹ Biotechnology and Biological Sciences Research Council (2006). Guidelines for dealing with alleged plagiarism of applications to BBSRC. http://www.bbsrc.ac.uk/alleged_plagiarism.doc [Accessed 25th September 2007].

² Office of Research integrity (2007). Guidelines for Responsible conduct of Research. <http://www.pitt.edu/~provost/ethresearch.html> [Accessed 24th September 2007].

³ Federal Policy on Research Misconduct http://www.ostp.gov/html/001207_3.html [accessed 25th September 2007].

⁴ Wellcome Trust (2002). Guidelines on Good Practice; including statements on the handling of allegations of research misconduct. http://www.wellcome.ac.uk/doc_WTD002757.html [Accessed 24th September 2007].