Code: **QA514**
Title: **Research Integrity**
Date: **03 December 2018**
Approval: **Academic Planning and Resource Committee**

1. Purpose

To promote the responsible conduct of research and the responsible management of research across all disciplines in NUI Galway, as well as to define the procedure for dealing with violations and allegations of research misconduct.

2. Description

NUI Galway has a duty to promote responsible research conduct so that research integrity infuses academic culture. The Policy defines the principles underpinning the responsible conduct and management of research, throughout the whole lifecycle of research activity, in line with best practice recommendations as set out in the revised *Policy Statement on Ensuring Research Integrity in Ireland* (2018)[1] which builds on the previous *National Policy Statement on Ensuring Research Integrity in Ireland* (2014) and the revised *European Code of Conduct for Research Integrity* (2017). The Policy provides a framework for the self-regulation of responsible research conduct by NUI Galway's research community.

If any conflict or ambiguity arises between the *Policy Statement on Ensuring Research Integrity in Ireland* or the *European Code of Conduct for Research Integrity* and this Policy, the NUI Galway Policy shall prevail. The setting of standards for professional behaviour in research is not intended to compromise the freedom, within the law, of Academic Staff to question and test received wisdom and to put forward new ideas and controversial or unpopular opinions (see section 14(2) of the Universities Act 1997).

3. Scope

This Policy applies to all individuals carrying out research for the University or on behalf of the University, including, without limitation; all undergraduate and postgraduate students; University employees, irrespective of whether their current place of work is within or outside University premises; and all visiting researchers of the University, including persons with honorary or adjunct positions. The term Researcher shall be used throughout this Policy to refer to any or all of the above categories, as appropriate.

4. General Principles of Good Research Practice

Research Integrity relates to the performance of research, across all disciplines, to the highest standards of professionalism and rigour, and to the accuracy and trustworthiness of the research record in publications and elsewhere. Research Integrity is based on fundamental principles of good research practice. These principles guide researchers in the conduct of their research, as well as in their engagement with the practical, ethical and intellectual challenges inherent in research and in their dealings with research partners and the audience that receives their research reports. NUI Galway endorses the principles of good research practice as defined in both the *European Code of*

---

[1] Draft Policy at advanced stage and expected to be published Q4 2018.

Conduct for Research Integrity and the revised *Policy Statement on Ensuring Research Integrity in Ireland*. These principles (further defined in Appendix 1) are:

- *Reliability* in ensuring the quality of research, reflected in the design, the methodology, the analysis and the use of resources.
- *Honesty* in developing, undertaking, reviewing, reporting and communicating research in a transparent, fair, full and unbiased way.
- *Respect* for Researchers (including research students), research participants, society, ecosystems, cultural heritage and the environment.
- *Accountability* for the research from idea to publication, for its management and organisation, for training, supervision and mentoring for its wider impacts.

All research conducted in the University must be consistent with the foregoing principles and with Irish law and policy and with all other related policies of the University. These include, but are not limited to Research Ethics, Open Access, Research Data Management, Intellectual Property, Conflict of Interest and Conflict of Commitment, and NUI Galway's Policy and Procedures for Financial Accounting. The scope of each principle listed above is defined in more detail in Appendix 1.

In order to underpin this Policy and to embed the principles of good research practice into the conduct of research, NUI Galway is committed to providing Research Integrity training for its Researchers, across the Research Career Pathway.

5.   Breaches of Research Integrity

Not only does failure to comply with good research practice violate professional responsibilities, it poses a reputational risk to the University also. It damages research processes, degrades relationships among Researchers, undermines society's trust in research, damages the credibility of the research record, wastes resources, and may expose research subjects, users, society or the environment to unnecessary harm.

Where the principles of good practice underpinning research integrity are not followed, a breach of Research Integrity (*i.e.* Research Misconduct) may arise. Research misconduct takes many forms and can be of varying seriousness. The most serious breaches of Research Integrity are:
- *Fabrication* – making up results and recording or reporting them as if they were real.
- *Falsification* – manipulating research, materials equipment or processes, or changing or omitting data or results without justification such that the research is not accurately represented in the research record.
- *Plagiarism* – using other people's work, results, words or ideas without giving proper credit to the original source, thus violating the rights of the original author(s) to their intellectual outputs.

Fabrication, *Falsification* and *Plagiarism* comprise a breach of the integrity of the research record and as such, must be vigorously defended against. In addition to the above direct breaches of Research Integrity, examples of other unacceptable practices include, but are not limited to:
- Poor data management practices, *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, including authors without permission.
- Republishing substantive parts of one's own earlier publications, without duly acknowledging or citing the original (*self-plagiarism*).
- Citing selectively to enhance own findings or to please reviewers, editors or other Researchers.

- Withholding research results/data from the research community.
- Misrepresenting research achievements.
- Misusing seniority to encourage violations of research integrity.
- Personal behaviours, *e.g.* inadequate leadership/supervision/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 or in appropriate research methods *e.g.,* harmful, dangerous or unethical research methods, non-observation of health and safety standards.
- Exaggerating the importance and practical applicability of findings.
- Supporting 'predatory' journals.
- Ignoring putative violations of research integrity by others or covering up inappropriate responses to misconduct or violations by institutions.
- Concealment of research misconduct.

More often than not, and unless the behaviour is persistent, the remedy for unacceptable practices resides within the research team. In their most serious forms, unacceptable practices are subject to sanction, but at the very least every effort must be made to prevent, discourage and stop them through training, supervision and mentoring and through the provision of a positive and supportive research environment.

For the purposes of this Policy, Research Misconduct is defined as Fabrication, or Falsification, or Plagiarism, or Persistent and/or Aggregated Unacceptable Practice(s) in proposing, performing or reviewing research, or in reporting research results. Research misconduct encompasses an intention to deceive, and consequently, it 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.

6.   Whistle-blowing

In circumstances where a Protected Disclosure of research misconduct is made, under the Protected Disclosures Act 2014, the University's Policy on Whistleblowing will apply[2]. However, as distinct from the University's Whistleblowing policy, all allegations of research misconduct shall be reported to the Research Integrity Officer in the first instance in line with this Policy**.**

7.   Procedure for Dealing with Violations and Allegations of Research Misconduct

7.1   The University is committed to ensuring that all allegations of research misconduct are investigated comprehensively, fairly and expediently, without compromising accuracy, thoroughness, or objectivity. The parties involved in the procedure must ensure that any interests they may have which might constitute a conflict of interest are disclosed and managed in line with the University's Conflict of Interest and Conflict of Commitment Policy. Any Researcher, individual or external body (*e.g.* a funding agency) who believes that an act of research misconduct has occurred or is occurring should report this incident to the Research Integrity Officer.

7.2   The Research Integrity Officer shall request that such a report be put in writing.

---

[2]https://staff.intranet.nuigalway.ie/policies/Lists/Policies%20%20Procedures/Attachments/150/QA414%20Whistleblowing.pdf. It should be noted that the Whistleblowing Policy will need to be updated to acknowledge the existence of this Research Integrity Policy.

7.3   The Research Integrity Officer will acknowledge receipt of such complaint or request normally within five working days.

7.4   Detailed and confidential records shall be maintained by the Research Integrity Officer on all aspects of the procedure.

7.5   The Research Integrity Officer may, at his/her discretion, choose to conduct a preliminary review of complaints received, depending on the seriousness of the issues, the credibility of the complaint, and the feasibility of confirming the complaint with credible sources. The preliminary review will not make any finding and the principle of natural justice will be applied to all stages of the preliminary review. This review will be conducted in a timely manner. The Research Integrity Officer shall on a strictly confidential basis, insofar as is possible, consult with an appropriate academic.

> **7.5.1** For *STAFF* complaints, such consultation shall include the level of Registrar or a Dean (either of whom may at their discretion choose an academic nominee or chose to consult the applicable Head of School, with due regard for gender balance).
>
> **7.5.2** For *STUDENT* complaints, such consultation shall include the Dean or Head of School. The Research Integrity Officer (or the Registrar or Dean or Head of School as applicable) may on a confidential basis seek the advice of other such persons as s/he or they consider appropriate having regard to the nature of the complaint or dispute, as well as to gender balance.

7.6   The preliminary review shall be limited to determining whether there is sufficient evidence of research misconduct for the Research Integrity Officer to refer the allegation for consideration under a formal University process or whether the complaint or dispute can be resolved locally and informally either by the Research Integrity Officer or within the academic unit concerned. The identity of the Respondent is confidential to the Research Integrity Officer and to the individuals s/he has consulted

7.7   Following the preliminary review, if the Research Integrity Officer determines that further investigation is not required, the matter may be dismissed or passed to the appropriate officer to be addressed under another applicable NUI Galway staff or student policy or procedure, as appropriate. Complaints that are considered to be mistaken, frivolous, vexatious and/or malicious will be dismissed at this stage. The Respondent will be notified that the complaint has been received and dismissed.

7.8   If, following the preliminary review, the Research Integrity Officer concludes that a complaint may give rise to a concern, s/he shall:

> 7.8.1 For STAFF members: Refer the complaint to the Director of HR to be processed in accordance with the applicable University policy and procedure.
>
> 7.8.2 For STUDENTS: Refer the complaint to the Dean of Students (or designated authority) to be processed in accordance with the applicable University policy and procedure.

7.9   The Research Integrity Officer will notify the complainant advising that the matter has been referred for consideration under University policy. The complainant will only be informed of the outcome of the University process if the applicable University policy provides for a complainant to be so informed.

7.10   OTHERS SUBJECT TO THIS CODE: Complaints or allegations of research misconduct against persons who are not serving staff members, current students or students within three months of their graduation date, at the time of the complaint or allegation and accordingly are not subject to NUI Galway's procedures: If such a complaint or allegation of research misconduct is made against a person who is not a serving staff member or current student or student within three months of his/her graduation/retirement/resignation from NUI Galway, at the time of the complaint or allegation, the Research Integrity Officer may conduct a preliminary review. Any such review will be conducted in a timely manner.

If, following the review, the Research Integrity Officer is satisfied that there is any evidence of research misconduct he/she may, following consultation with Registrar or Dean:

- advise the complainant to contact an institution of which the person who is complained about is a member of.
- notify other institutions or entities that have a legitimate, material interest in the outcome of the matter.

7.11 No person should suffer penalty for making an allegation of research misconduct in good faith. However, if the Research Integrity Officer concludes that a complaint is frivolous, vexatious and/or malicious, the Research Integrity Officer may recommend that action be taken against the complainant under the appropriate NUI Galway disciplinary procedure having regard to the complainant's status as a student or a member of the staff of NUI Galway.

7.12 There is no right of appeal against the decision of the Research Integrity Officer under this paragraph 7, since it refers to preliminary procedures only. Respondents will have a right of appeal under the appropriate disciplinary procedures in the event that further action is taken thereunder.

8. Responsibility

It is the responsibility of the President, Registrar and Deputy President, Vice-President for Research, Deans of College, Heads of School, Dean of Graduate Studies, and senior staff to maintain a research environment that develops and supports good research practice and nurtures a culture of research integrity. It is important to establish a research climate of mutual cooperation, in which Researchers at all levels are encouraged to develop their skills and in which the open exchange of ideas is fostered.

Researchers are required to make themselves aware of and ensure that all relevant requirements of Irish Law and University Policy are met.

Researchers have a responsibility to report any concerns about research misconduct to the University, whether this has been witnessed or for which there are reasonable grounds for suspicion.

Name	Responsibility
The University Management Team	Policy owner. Academic Policy subject to the appropriate academic consultation.
The Vice President for Research	Training Revisions to the Policy
Dean of Graduate Studies	Training
Dean of Students	Student Issues. Conduct disciplinary investigation, if necessary.
All University Members including all undergraduate and postgraduate students	Compliance with the Policy and Irish law and duty to report Researchers (*i.e.* all individuals carrying out research for the University within or on behalf of the University, including, without limitation; all undergraduate and postgraduate students; University employees, irrespective of whether their current place of work is within or outside University premises; and all visiting researchers of the University, including persons with honorary positions) must be alert to instances of

	research misconduct and have a duty to report such conduct to the Research Integrity Officer.
Deans of Colleges, Heads of Schools and all in positions of responsibility	Be alert to possibility and type of research misconduct in respective areas. Work with University to investigate. Take corrective action(s).
Research Integrity Officer	Initial Investigator Provide annual report to UMT and the National Research Integrity Forum
Preliminary Review Committee	Co-operate with the Research Integrity Officer with the initial investigation.
Director of Human Resources	Conduct disciplinary investigation, if necessary.

9.   Definitions

"Data" shall encompass information related to research data and research results in a form   that may be processed, the methodology used to obtain results, the actual research results, and the analytics, and interpretations by the Researchers.

 "Researcher" shall mean all individuals carrying out research for the University including, without limitation, all University employees, irrespective of whether their current place of work is within or outside University premises and all visiting researchers of the University, including persons with honorary positions, conducting research within or, on behalf of, the University, and all undergraduate and postgraduate students.

"Research Integrity" is defined as the performance of research, across all disciplines, to the highest standards of professionalism and rigour, and to the accuracy and trustworthiness of the research record in publications and elsewhere

"Research Integrity Officer" is the person nominated by the University to receive allegations of misconduct in research. If a conflict of interest arises such that the Research Integrity Officer cannot act in respect of a particular matter under this Policy or if for any other reason the Research Integrity Officer cannot act in respect of any particular issue under this Policy, the President may appoint an *ad hoc* Research Integrity Officer to deal with the matter under this Policy.

'Research Misconduct' is defined as Fabrication, or Falsification, or Plagiarism, and/or Persistent or Aggregated Unacceptable Practice(s) in proposing, performing or reviewing research, or in reporting research results.

Appendix 1. Principles of Good Research Practices

1. Reliability

- Researchers take into account the state-of-the-art in the design in developing research ideas.
- Researchers design, carry out, analyse and document research in a careful and well-considered manner.
- Researchers make proper and conscientious use of research funds.
- Researchers ensure that all publications and presentations arising from research is correct and accurate. Authors and publishers issue corrections or retract work if necessary; the processes for which are clear, the reasons are stated, and authors are given credit for issuing prompt corrections post-publication.
- The University expects anyone listed as an author on a paper to accept personal responsibility for ensuring that they are familiar with the contents of the paper, and that they can identify their contributions to it. The practice of honorary authorship is unacceptable.
- All authors agree on the sequence of authorship acknowledging that authorship itself is based on a significant contribution to the design of the research, relevant data collection, or the analysis or interpretation of results.
- Researchers publish results and interpretations of research in an open, honest, transparent and accurate manner; and respect confidentiality of data or findings when legitimately required to do so.
- Authors are responsible for the content of a publication, unless specified otherwise.
- Researchers report their results in a way that is compatible with the standards of the discipline and, where applicable, can be verified and reproduced.
- Throughout their work, Researchers shall keep clear and accurate records of the research procedures followed, approvals granted and of interim and final results. Data must be managed according to good practices for collection, curation, storage, management, retrieval, re-use, sharing, archiving, and access, and in line with NUI Galway's Research Data Management Policy.
- Researchers shall adhere to the University's policy on Data Handling[3] and Data Classification[4] in order to classify data and keep data secure. The University expects such data to be securely held for a period of ten years after the completion of a research project, as required by several Research Funding Agencies. Some funding bodies may require data to be kept for longer periods and it is the responsibility of the PI to ensure that the data retention meets with the requirements of the funding body in such cases.
- If the PI leaves the University, for whatever reason, before the required period of data retention expires, they have responsibility to ensure that the data are securely held by the University.
- If Post-Doctoral Researchers or postgraduate students leave the University, for whatever reason, before the required period of data retention expires, they must leave all research records with the PI.
- All personal data collected and processed in the course of a research project is subject to the terms of the General Data Protection Regulation (2016), which safeguards the privacy of individuals regarding their personal data. All Researchers must adhere to the University's policy on Data Protection[5].

---

[3] http://www.nuigalway.ie/media/data-protection/QA401-Data-Handling-Policy.pdf
[4] http://www.nuigalway.ie/media/data-protection/QA-402-Data-Classification-Policy.pdf
[5] http://www.nuigalway.ie/media/oifiganrunai/files/QA400-NUI-Galway-Data-Protection-Policy.pdf

- Researchers collecting or accessing personal health data must be aware of the additional requirements covering sensitive personal data and all health research must conform to the specific data protection regulations covering health research[6].
- Where Researchers are gathering data in another jurisdiction they must ensure that the relevant ethical approvals and permissions from the appropriate organisation are obtained. Researchers must comply with any data protection legislation from the respective jurisdiction where they are collecting, storing, transferring and archiving data.
- Publication of results should be undertaken at the earliest possible time, unless intellectual property considerations justify delay. The University expects that this period of deferral should not normally exceed six months.
- Where applicable, authorisation for publication of results must be sought from the Principal Investigator. Authorisation should cover both the content of the publication (integrity of results, adequacy of internal peer review, appropriate protection of intellectual property rights, appropriate authorship) and the intended place of the publication.
- In general, except where there is an alternative contractual arrangement, research findings must not be reported in the public media before they have been reported to a research audience of experts in the field of research - preferably by publication in a peer-reviewed journal, an authored book, published by a reputable publisher, or a conference presentation.
- At the time of publication, Researchers disclose any conflicts of interest and financial or other types of support for the research or for the publication of its results.
- Researchers should be aware that many journal editors seek assurances that all research has been approved by an appropriate research ethics committee or institutional review board. In addition, journal editors may also seek evidence regarding research practices and ethical aspects of the research.
- Once results have been published, where appropriate, the University expects Researchers to make available relevant data and materials to others, on request, provided that this is consistent with any ethical approvals and consents which cover the data and materials, and any intellectual property rights (IPR) in them. In addition, where available and relevant to the research or individual Researcher in question, the University expects Researchers to observe the standards of practice set out in guidelines published by funding bodies, scientific societies and other relevant professional bodies.
- Researchers are required to adhere to the University's policy on Open Access to Research Outputs[7].

2. Honesty

At the heart of all research endeavour, regardless of the discipline or institution, is the need for Researchers to be honest in respect of their own actions in research and in their responses to the actions of other Researchers. This applies to the whole range of activity associated with research, including but not limited to:
- Experimental design, generating and analysing data in an impartial manner independent from undue influence.
- Publishing results or in other ways making results publically available.
- Considering negative results to be as valid as positive findings for publication and dissemination.
- Acknowledging the direct and indirect contributions of Researchers, collaborators and others.

[6] Data Protection Act 2018 (Section 36(2)) (Health Research) Regulations 2018
[7] https://library.nuigalway.ie/media/jameshardimanlibrary/content/documents/QA237-Open-Access-to-Research-Outputs.pdf

- Planning and design for funding applications.
- Managing a project. Principal Investigators (PIs) should take all reasonable measures to ensure compliance with sponsor, institutional, legal, ethical and moral obligations in managing projects. Researchers are expected to familiarise themselves with the terms and conditions of any research contract or agreement entered into by the University on their behalf.
- Management of funds. It is the responsibility of the PI to ensure that the expenditure on the grant is in accordance with the budget and the associated terms and conditions and that no penalties are incurred by failure to meet the sponsors' requirements.
- Grant and paper reviewing.
- Identifying and declaring to the University any conflicts of interest, whether legal, ethical, moral, financial, personal or other nature so that it does not become a complicating or actionable issue. In this regard, Researchers shall adhere to the University's Conflict of Interest and Conflict of Commitments policy.

3. Respect
- Researchers handle research subjects, be they human, animal cultural, biological, environmental, or physical, with respect and care, in accordance with legal and ethical provisions.
- Researchers have due regard for the health, safety and welfare of the community, of collaborators and others connected with their research.
- Researchers recognise and manage potential harms and risks relating to their research.
- Research protocols take account of, and are sensitive to, relevant differences in age, gender, culture, religion, ethnic origin and social class.
- Research in the medical, biological and social science and any other disciplines involving human and animal subjects raises particular ethical concerns. A system of ethical governance has been developed for research in these areas. Where prior ethical approval is required detailed information on institutional ethical approval process is available at the University's Research Ethics webpage[8].
- Researchers must obtain prior consent from participants, except where the absence of consent is permitted by law or governmental/institutional regulation, or is explicitly approved by the appropriate ethics committee. Informed consent must be sought in writing unless alternative means have been approved by the appropriate Ethics Committee.
- Researchers are obliged to ensure that the possible benefits to the participants will be maximised and possible harm minimised. Harm includes physical discomfort, psychological or emotional distress and social and economic disadvantages.
- Participants in research must be selected in a fair way. The selection process must be scrutinised to determine whether participants are selected in a fair and equitable manner and for reasons directly related to the problem being investigated and not for reasons such as availability or manipulation. Fair selection also requires that, as far as possible, those who bear the risks of research must be in a position to enjoy its benefits.
- Researchers have a duty of care for participants in and the subjects of research (human subjects, animals, the environment, cultural objects). The health, safety and welfare of people connected with research should not be compromised. Special consideration should be given to vulnerable groups and sensitivity given to age, gender, culture, religion, ethnic origin, social class, sexual orientation and disability research groups. Researchers should consult with the University Research Ethics Committee (REC), the Animal Care Research Ethics Committee

(ACREC) and the Galway University Hospital Research Ethics Committee (GUH REC) for specific information regarding research with human participants and animals respectively.

- Researchers should consult with the Galway University Hospital Research Ethics Committee (GUH REC) in respect of Clinical research in healthcare settings.
- Researchers should consult with the Research Ethics Committee (REC) in respect of non-clinical research involving human participants (including behavioural experiments, interviewing and surveying).
- Researchers should consult with the Animal Care Research Ethics Committee (ACREC) in respect of research involving animals. Researchers must ensure that they hold an appropriate licence and that their research is in conformity with the current statutory regulations regarding scientific animal protection as set out by the [Health Products Regulatory Authority](#).
- Any research which requires ethical approval but does not come under the remit of GUH REC, REC or ACREC, must be referred to the University Research Ethics Committee. If Researchers are unsure which ethics committee is appropriate for their research, they should refer the matter to the University Ethics Committee for guidance.
- Research which requires ethical approval must not commence until approval has been granted.
- If a Researcher proposes to extend a research project or depart from the approved procedure, a fresh application for approval or an amendment to the original ethics application must be made and approved to the relevant ethics committee.

4. Accountability
- The culture and tone of procedures within any organisation must be set by individuals in authority. Within the University, it is the responsibility of the President, Vice-President for Research, Deans of College, Heads of School and senior staff to ensure that a climate is created which allows research to be conducted in accordance with good research practice.
- Research institutions provide clear policies and procedures on good research practice and transparent and proper handling of violations.
- Within a research group, responsibility for supervision and mentoring lies with the Group Leader. Group Leaders should create a research environment of mutual co-operation, in which all members of a research team (including contract researchers, students, technicians and administrative staff) are encouraged to develop their skills and in which the open exchange of research ideas is fostered. They must also ensure that the offer specific guidance and training to their research team to properly develop, design and structure their research activity and to foster a culture of research integrity.
- Researchers across the entire career path, from junior to the most senior level, shall undertake training in ethics and research integrity.
- There is a responsibility on supervisors to oversee the research projects of all team members and to ensure that good practices are followed. Research misconduct is least likely to arise in an environment where good open research practice is encouraged and where there is adequate supervision of team members at all relevant levels. It is the responsibility of Heads of School and Directors of Research Institutes to convey clearly the standards and protocols for research in their areas, and to ensure that adherence to those standards is a matter of course.
- In order to promote best practice in responsible research behaviour, the University also provides online training in Research Integrity to all Researchers. By the end of the course, Researchers should be able to:
    1. *Know, understand and explain the key responsibilities they have as a Researcher.*

2. *Identify the challenges they could face in meeting those responsibilities.*
3. *Be aware of strategies for dealing with pressure and difficult situations.*

- It is the responsibility of all Researchers to fully abide by the codes of ethics and standards of professional conduct relevant to their profession and any other existing guidance issued by their respective regulatory or professional bodies.

- Researchers are expected to be aware of and stay informed of governmental, institutional and any other regulations, standards or policies, including national, EU and international legislation, in proposing, conducting and reporting research.