



Response to the Stakeholder Consultation: Revision of the European Code of Conduct for Research Integrity

Author(s)

Jonas Åkerman, Cath Cotton, Susan Hommerson, Maruxa Martínez-Campos, Joana Porcel, Borana Taraj

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Recipient(s)

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Response to the Stakeholder Consultation: Revision of the European Code of Conduct for Research Integrity

BACKGROUND

This response provides the perspective of the Ethics and Research Integrity Network (ERION) to the Stakeholder Consultation of the ALLEA Secretariat for the revision of the European Code of Conduct for Research Integrity.

ERION is the Ethics and Research Integrity Officer Network within EARMA. It is an open community to discuss the practical and implementation side of Research Ethics and Integrity. The community is for all those that need to ensure compliance, efficiency, functionality, fairness and robustness in the practices and processes in their organisation. The authors of this response are mentioned in the frontpage and in page 10 *List of authors*.

QUESTIONS

Written feedback and suggestions - Revision of the European Code of Conduct for Research Integrity - in the form of a response to the following three questions:

1. Are there recent developments that are not reflected adequately?
2. Are the formulations clear and easy to read?
3. Are there any key resources that should be added/replaced/updated?

For all suggested changes to the main text or the list of key resources, please provide a short explanation and a concrete suggestion for a formulation, noting that it is important not to make changes unless they add something new or important to the Code.

1. Are there recent developments that are not reflected adequately?

No specific feedback for this question.

2. Are the formulations clear and easy to read?

- a) Page 3: *“A basic responsibility of the research community is to formulate the principles of research, to define the criteria for proper research behaviour, to maximise the quality and robustness of research, and to respond adequately to threats to, or violations of, research integrity. Research integrity is crucial to preserving the trustworthiness of the research system and its outputs. The primary purpose of this Code of Conduct is to help realise this responsibility and to serve...”*

Comment: This could be made clearer and easier to read by moving the sentence “Research integrity is crucial to preserving the trustworthiness of the research system and its outputs.” to the top of the paragraph. Suggested formulation: “Research integrity is crucial to preserving the trustworthiness of the research system and its outputs. Basic responsibilities of the research community are to formulate the principles of research, to define the criteria for proper research behaviour, to maximise the quality and robustness of research, and to respond adequately to threats to, or violations of, research integrity. The primary purpose of this Code of Conduct is to help realise these responsibilities and to serve...”

- b) Page 3: *“Therefore, this Code of Conduct is relevant and applicable to publicly funded and private research, whilst acknowledging legitimate constraints in its implementation.”*

Comment: Given the previous (newly added) sentence, this needs to be broadened, since “those who define the priority and criteria...” are not just those active in research (it also includes e.g. policymakers at various levels). Suggested formulation: “Therefore, whilst acknowledging legitimate constraints in its implementation, this Code of Conduct is relevant

and applicable to the whole research community (including both the public and the private sector), as well as other actors who contribute to creating incentives and conditions for research.”

c) *Page 3: “also applies to new research practices such as Citizen Science”*

Comment: This needs to be clarified. While this may be true for the general principles, many of the descriptions in section 2 are difficult to apply to Citizen Science. It is also not clear in what sense citizen science is “new”. It arguably existed for a long time (e.g. see this link <https://www.citizenscience.gov/north-american-bird-phenology-program/#>), even if it is now a more rapidly growing trend. Suggested formulation: “and its general principles also apply to unconventional research practices such as Citizen Science”.

d) *Page 5: “Research institutions and organisations create an environment of mutual respect that implies a responsibility to promote equity, diversity, and inclusion.”*

Comment: It needs to be clearer that this is not just a politically motivated add-on, but that there is actually a strong connection between fostering a culture of research integrity and creating the kind of environment that contributes to facilitating equity, diversity, inclusion, and other important values. It would also be good to mention freedom as an example of an important value. One suggestion would be to merge it with the previous bullet point, resulting in the following formulation: “Research institutions and organisations promote awareness and ensure a prevailing culture of research integrity and mutual respect, thereby also contributing to facilitating key values such as freedom, equity, diversity, and inclusion.”

e) *Page 6: “Senior researchers, research leaders and supervisors mentor their team members and offer specific guidance and training to properly develop design and structure their research activity and to foster a culture of research integrity.”*

Comment: In order to clarify what is probably intended but not explicitly mentioned and to strengthen the new point added in 2.1 about equality, diversity and inclusion, it could be added that they should also foster a culture of mutual respect. Suggested formulation: “Senior researchers, research leaders and supervisors mentor their team members and

offer specific guidance and training to properly develop, design and structure their research activity and to foster a culture of research integrity and mutual respect.”

f) Page 7: “Researchers handle research subjects (be they human, animal, cultural, biological, environmental or physical) and related sensitive data with respect and care, and in accordance with legal and ethical provisions.”

Comment: It is not clear what is meant by “sensitive”, which might be understood in GDPR terms but can also mean different things in different cultures and contexts. In any case, all data should be handled with respect and care and in accordance with legal and ethical provisions, so it would be clearer if “sensitive” was deleted. Suggested formulation: “ Researchers handle research subjects (be they human, animal, cultural, biological, environmental or physical) and related data with respect and care, and in accordance with legal and ethical provisions.”

g) Page 7: “Research protocols take account of, and are sensitive to, relevant differences in age, gender, culture, religion, ethnicity, geographical location, and social class.”

Comment: It needs to be clarified that the list is open ended (there are a lot of relevant characteristics that are not explicitly mentioned, e.g. functional diversity, etc.), and one might also want to add “sex” (which is different from “gender”) as one of the most important examples. Suggested formulation: “are sensitive to differences in age, sex and gender, culture, religion, ethnicity, geographical location, social class and other relevant characteristics”.

h) Page 7: “Researchers, research institutions, and organisations inform and gain consent from research subjects about how their data will be used, accessed and stored.”

Comment: This is unclear and potentially misleading, as it may give the (incorrect) impression (i) that consent is only needed for personal data processing and (ii) that consent is the preferred legal basis for processing of personal data (which, on the contrary, is explicitly discouraged in many contexts). Since there are no qualifications, strict adherence to this will

make it impossible to conduct certain kinds of research (e.g. involving certain kinds of statistical material, studies involving deception, and studies involving people unable to give consent). In order to clarify that this is not the intended message, this bullet point should be moved to 2.4. (about safeguards) and be reformulated in a more general way. A code of this kind should focus on the more general default requirement to obtain informed and voluntary consent for participation in research, which is primarily a responsibility of the researchers conducting the research (the inclusion of institutions and organisations here is a bit confusing). Suggested formulation: "Researchers comply with established standards of obtaining informed and voluntary consent for participation in research and/or processing of personal data."

- i) *Page 8: "All partners in collaborations that cross traditional professional boundaries, for example Citizen Science projects, take responsibility to apply the above points in an appropriate manner."*

Comment: It is not clear whether this only includes the points in 2.6 or also other "above" points. Many other points seem at least as relevant (e.g. in 2.4) and depending on what is meant by "partner" here, some of the points in 2.6 may not be appropriate. Clarifying this in a way that would turn this into something helpful would probably mean going into more detail than what can be fitted into a single bullet point, so one suggestion would be to delete this. Given that there is a general formulation in the beginning that the document is intended to be applicable to e.g. Citizen Science, it seems unnecessary to add this potentially confusing point.

- j) *Page 8: "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, interpretation, or drafting of the outputs."*

Comment: This needs to be clarified. As it is written, someone who *only* participated in the drafting of the results (e.g. writing the paper) but did nothing else, could be an author, which is not acceptable according to the standards in at least some disciplines. In order to both simplify and make it more general and applicable to different discipline

standards, please consider the following alternative formulation: "authorship itself is based on a significant contribution to the research, according to the rules of the field or discipline".

k) Page 8: "Authors develop a prior preliminary agreement in writing on authorship roles and responsibilities and add an "Author Contribution Statement" to the final publication."

Comment: It is not clear why "a prior preliminary agreement in writing on authorship roles and responsibilities" is considered to be required over and above what follows from bullet point 4 in 2.6. It gives the impression of something quite formal and binding, which may not always be a good idea and thus should not be formulated as a requirement as that will be very confusing for those for which this is not feasible. Suggestion: qualify this bullet point with "Whenever possible and appropriate, ..." or something similar.

l) Page 8: "Authors acknowledge important work and intellectual contributions of those who do not meet the criteria for authorship, including collaborators, assistants, and funders, who have influenced the reported research in appropriate form, and cite related work correctly."

Comment: It needs to be clarified which criteria of authorships are intended here. Or if the thought is that these should be allowed to vary across disciplines etc. This should be clarified. Also, it is not clear what is meant by the example with funders, who should be acknowledged, but generally not by their 'work and intellectual contributions', so that should be deleted. Suggested formulation: "Authors acknowledge important work and appropriate intellectual contributions of those who do not meet the criteria for authorship applicable in the situation, including collaborators and assistants, and cite related work correctly."

m) Page 9: "Authors, publishers, and the research community consider negative results to be as important as positive findings for publication and dissemination."

Comment: In order to clarify that funders also have an especially important role here "funders" should be added, resulting in the following formulation: "Authors, publishers,

fundlers and the research community consider negative results to be as important as positive findings for publication and dissemination.”

n) *Page 9: “Assessment practices for researchers and research projects are based on principles of quality, impact, diversity, inclusiveness, and collaboration that go beyond narrow quantitative indicators.”*

Comment: This is a very relevant issue considering all the advances in reforming research assessment, but there is a danger of muddling the central message by including all of these specific parameters. It would be clearer to stop at "quality and impact". It is somewhat unclear how to make good sense of assessment in terms of at least some of the other parameters at the level of individual researchers or projects. It is also important not to completely exclude quantitative indicators, the important thing is that they are used responsibly. The following COARA statement points in the right direction: *“This requires basing assessment primarily on qualitative judgement, for which peer review is central, supported by responsible use of quantitative indicators”*.

Two possible suggested formulations:

1. *“Assessment practices for researchers and research projects are based on principles of quality and impact that go beyond (but do not necessarily exclude) quantitative indicators.”*
2. *“Assessment practices for researchers and research projects are based on principles of impact and quality - including inclusiveness, collaboration or transparency - that go beyond (but do not necessarily exclude) quantitative indicators.”*

o) *Page 9: “Researchers adhere to the same criteria as those detailed above whether they publish in a subscription journal, an open access journal or in any other alternative publication form, including pre-print servers.”*

Comment: This is probably intended to also apply to the two newly added bullet points that follow this one, but given the formulation “those detailed above” this is not clear. Suggestion: Move the last two bullet points of this section to the top of the section.

p) Page 10: *“Plagiarism is using other people’s work and ideas without giving proper credit to the original source, thus violating the rights of the original author(s) to their intellectual outputs.”*

Comment: This is the same as in the 2017 version, but since it is potentially misleading, it should nevertheless be modified. More specifically, the part after the comma – “thus violating the rights of the original author(s) to their intellectual outputs” – should be deleted, since it may be taken to suggest that plagiarism only can only occur when the original authors' intellectual property rights are violated (which is of course not true). Suggested formulation: “Plagiarism is using other people’s work and ideas without giving proper credit to the original source”

q) Page 11: *“Withholding research outputs in part or whole, or splitting up outputs into minimal publishable units (“salami publications”).”*

Comment: It is not entirely clear what is meant here. Couldn't there be cases in which it would be motivated to withhold research outputs to at least some extent? Something should be added to allow for this possibility, at least in cases where sharing the outputs would be associated with a big risk of very serious harm. Also, it is not clear why this is merged with the point about “salami slicing”, which is arguably a quite different thing, and should be put in a separate bullet point. Suggested formulation: “Withholding research outputs in part or whole without adequate justification.”

3. Are there any key resources that should be added/replaced/updated?

To be added:

SOPs4RI: Standard Operating Procedures for Research Integrity; <https://sops4ri.eu/>

CoARA: Coalition for Advancing Research Assessment; <https://coara.eu/>

List of authors

Jonas Åkerman, Stockholm University

Cath Cotton, Delft University of Technology

Susan Hommerson, Eindhoven University of Technology

Maruxa Martínez-Campos, Universitat Pompeu Fabra (UPF)/Barcelona Biomedical Research Park (PRBB)

Joana Porcel, ISGlobal

Borana Taraj, European Association of Research Managers and Administrators (EARMA)



Rue Joseph II, 36-39
B-1000 Brussels
Belgium
earma@earma.org
www.earma.org

EARMA VAT No: BE.0831.444.012
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