



## **UK Research Integrity Office**

### **Summary of the analysis of the responses to the consultation on the Code of Practice for Research: *Promoting good practice and preventing misconduct***

#### **1.0 Background and summary**

- 1.1 The UK Research Integrity Office (UKRIO) has produced a draft Code of Practice for Research, designed to encourage good conduct in research and help prevent misconduct. The Code provides general principles and standards for good practice in research, applicable to both researchers and research organisations, and is designed to be used as a reference tool when drafting or revising organisational codes of practice. Particular attention has been paid to those areas of research conduct where UKRIO has most often been approached for assistance, in order to pass on the benefit of our experiences to the research community.
- 1.2 A public consultation on the draft Code of Practice was held in May 2009.
- 1.3 A consultation document comprising the draft Code and a number of questions for particular consideration was circulated to UK universities, NHS bodies and other organisations involved with research, such as professional and regulatory bodies, learned societies and relevant representative bodies and charities. The consultation document was also published on the UKRIO website [www.ukrio.org](http://www.ukrio.org).
- 1.4 103 responses were received. The majority of responses gave direct answers to the questions posed. Many responses discussed the subject in considerable detail and a large number of useful points were raised and valuable suggestions on the development of the Code made.
- 1.5 88 responses were broadly in favour of the Code, representing 94% of responses that expressed a clear opinion on the matter and 85% of total responses.

#### **2.0 Response to consultation questions**

- 2.1 Most of the 103 responses gave direct answers to the questions posed in the consultation document.
- 2.2 86% of those who gave a clear response felt that the Code has the potential to help organisations and researchers to understand better the principles and standards of good conduct in research.
- 2.3 87% of those who gave a clear response felt that the Code has the potential to help organisations to understand better their responsibilities in promoting and supporting a culture of good practice in research.

## **2.0 Response to consultation questions (continued)**

- 2.4 74% of those who gave a clear response felt that the Code has the potential to help researchers to consider the wider consequences of their work and to engage critically with good practice in research, rather than treating codes of practice such as this as just another procedure to be followed.
- 2.5 64% of those who gave a clear response considered that there were omissions in the Code and that further material could be included. The majority of these respondents made similar suggestions on the material to be added to the Code (see 3.3 below for a summary of issues raised).
- 2.6 92% of those who gave a clear response would consider using the Code when drafting or revising their own, more detailed, codes of practice.
- 2.7 41% of those who gave a clear response felt that the Code is broadly similar to existing mechanisms for promoting good practice in research at their organisation. 37% of those who gave a clear response felt that the Code is more detailed/ longer than their existing guidance, whilst 22% felt that it is less detailed/ shorter.
- 2.8 95% of those who gave a clear response would want other organisations to use the Code.
- 2.9 19% of those who gave a clear response felt that the Recommended Checklist for Researchers, Section 3.0 of the Code, should include a requirement for signing off and verification that its contents have been understood and complied with by the researcher. A major concern of those respondents who were not in favour of this requirement for signing off and verification was that it would cause undue bureaucracy and detract from the clear educational benefits of the checklist.
- 2.10 68% of those who gave a clear response felt that a similar checklist for organisations would be useful. 53% of those that expressed a clear preference felt this should be a checklist for organisational systems and policies to ensure good practice in research, whilst 13% felt this should be a checklist for staff responsible for the governance of a research project and 33% were in favour of both.

## **3.0 Comments and issues raised**

- 3.0.1 A large number of detailed comments and suggested changes were received. UKRIO has taken all of these into account when revising the Code of Practice to produce the final publication, paying particular attention to those areas of the Code which were considered by some to be unclear or excessively prescriptive. The most common comments and issues raised have been summarised below.

### **3.1 Uses of the Code**

- 3.1.1 Whilst some respondents suggested that their organisation would seek to adopt the Code in its entirety, many felt that it would be most useful as a 'gold standard' to which research organisations could subscribe or as a supporting document for the creation and revision of organisational codes and guidelines, as intended.

### **3.1 Uses of the Code (continued)**

- 3.1.2 The freedom of organisations to utilise the Code in the way best suited to them was particularly appreciated by respondents. Respondents welcomed the Code's recognition that, while there should be common approaches to common issues, organisations and researchers are best placed to determine the right way to put the promotion and support of good research practice into operation in their particular research environment.
- 3.1.3 Many respondents felt that widespread adoption of the Code could lead to greater uniformity of approach between research organisations, providing a significant benefit to the research community, particularly in light of the move towards collaborative research in recent years. Some respondents felt that the Code would be of particular benefit if adopted by industrial organisations which do not always have codes of conduct comparable to those of academic institutions.
- 3.1.4 Many respondents felt that the Code would be particularly useful for organisations with limited experience of research activity, though it would also help organisations with more experience ensure that important issues have not been overlooked.
- 3.1.5 Respondents recognised that the Code was applicable to all subject areas. In particular, it was suggested that the Code's applicability to the humanities and social sciences, as well as scientific disciplines, meant that it could be usefully adopted by research organisations whose efforts are concentrated in these fields.
- 3.1.6 Several respondents suggested that the Code was most applicable to research institutions and its uptake by funding bodies and other types of research organisations could lead to undesirable duplication of standards and guidelines. However, several of the funding bodies and other types of research organisation who responded to the consultation were in favour of the Code and felt that it could be usefully disseminated to the research institutions with which they are involved.

### **3.2 General comments**

- 3.2.1 Most responses described the draft Code in favourable terms, using adjectives such as 'concise' and 'comprehensive' and many commented favourably on its clarity, use of 'plain English' and 'sense of process'. A number of respondents did feel that some of the terminology used in the Code was vague and should be defined more clearly, including such terms as 'all necessary monitoring' and 'appropriate.' It should be noted, however, that the draft Code was heavily edited prior to the consultation to remove as many of these terms as possible; those that remained were considered to be necessary to address differences in research practice between subject areas.
- 3.2.2 A number of respondents expressed a desire for UKRIO and the other organisations involved with research integrity in the UK to collaborate to produce a single code of practice for research. UKRIO has been aware for some time that many in the UK research community would prefer more uniformity and clarity in guidance on the conduct of research and is working with other organisations to address this issue.

## **3.2 General comments (continued)**

- 3.2.3 There was some disagreement over the Code's length and the level of detail contained within it. Some respondents felt that the Code was too detailed, whilst others felt that a lack of subject-specific information would limit its usefulness. However, most respondents felt that the Code's applicability to all disciplines was a bonus and suggested that it should be viewed as intended: as a reference tool for the creation or revision of more detailed institution- or subject-specific guidelines. Many respondents felt that, in order to maximise its usefulness, the Code should signpost key pieces of guidance and legislation, though views on what to include varied.
- 3.2.4 Whilst some respondents felt that the Code focused too much on research design, and should be restricted to issues of research integrity, more felt that the Code succeeded in attempting not to micro-manage research. Most respondents recognised that the Code covers the areas of good practice in research typically included in existing organisational policies for the conduct of research.
- 3.2.5 Many respondents particularly approved of the Code's clear distinction between the roles of researchers and organisations and the way it defined corporate and individual responsibilities. They felt that this improved the clarity and accessibility of the Code and was an advantage over other documents of this kind.
- 3.2.6 Many respondents found the Recommended Checklist for Researchers to be a particularly useful tool. Only a few respondents felt that they would mandate use of the checklist by all research projects and there was little support for a signing-off requirement. However, many respondents felt that the checklist could serve as a useful aide-mémoire, as well as a training tool for students and new researchers. It was also suggested that the brevity, and therefore accessibility, of the checklist mean that, if widely published, it could make a significant contribution to upholding research standards in the UK.

## **3.3 Suggested inclusions**

- 3.3.1 Most respondents approved of the content of Code, describing it in such terms as 'comprehensive, yet concise and accessible', 'very thorough and helpful' and 'provides the research organisation and the researcher with clear but ample guidance as to the expected standards for the conduct of research'. Respondents also welcomed that the Code 'does not attempt to micro-manage research'. However, respondents also suggested certain issues covered by the Code warranted more guidance or that further material could be included,
- 3.3.2 Several respondents felt that the Code's statement of purpose should be made clearer. It was suggested that an introductory section to this effect could increase uptake of the Code by stating its aims, the reasons why codes such as this are necessary and the reasons why it is important that organisations adopt them.
- 3.3.3 Several respondents suggested that 'striving for excellence', or producing high quality research, should be included in the list of Principles.
- 3.3.4 Some respondents felt that the Code would benefit from the inclusion of examples or case studies of good research practice and misconduct. This would of course increase the length of the Code and might be best published as separate supplementary material.

### **3.3 Suggested inclusions (continued)**

- 3.3.5 Several respondents felt that the Code should discuss alternative approaches to fostering good research conduct, including more information on investigations of misconduct in research. The Code does reference the UKRIO Procedure for the Investigation of Misconduct in Research, which gives detailed information on this subject, but further information will be added to the final publication.
- 3.3.6 Several respondents felt that the issues of consent, confidentiality and data protection were sufficiently important to warrant more focused discussion.
- 3.3.7 Several respondents suggested inclusion of guidance on avoidance of misuse of research or the findings of research.
- 3.3.8 A number of respondents suggested that the Code include guidance on the requirement for sufficient insurance and indemnity; risk assessment; and how the Code would work with other organisational policies, such as those for health and safety, raising concerns at work, management of finances or of intellectual property, and equality and diversity.

### **3.4 Suggested changes**

- 3.4.1 As above, most respondents viewed the content of the Code favourably; however, some respondents felt that certain sections could be viewed as unclear or excessively prescriptive and should be revised. Most comments of this nature referred to the same sections of the draft document.
- 3.4.2 It was suggested that the definition of 'researchers' should be changed to clarify the position of undergraduates performing research. It should be noted that many universities hold undergraduate students to different standards of behaviour than postgraduate students and other researchers and this may have to be reflected in the Code.
- 3.4.3 A number of respondents suggested that, while it is good practice to agree roles and responsibilities of researchers at an early stage in the design of a project, roles and contributions may change during the time span of the research, subject to legal and ethical requirements, and this should be reflected in the Code. Similar comments were made regarding publication, and the attribution of authorship.
- 3.4.4 Many respondents recommended altering the section on conflicts of interest to state more clearly that conflicts of interest should be assessed and managed and are not always cause to terminate an individual's involvement with the research concerned.
- 3.4.5 Many respondents felt that the section on data management was too prescriptive and many organisations would not be able to fully comply due to resource limitations. It was suggested that specific guidelines concerning, for example, the time period for which research data should be retained should be the decision of individual organisations.
- 3.4.6 Some respondents suggested that the section on monitoring and audit be revised to reflect a risk-based, proportional approach.
- 3.4.7 Many respondents pointed out that there are a number of mechanisms, including the publication of abstracts, conference proceedings and institutional repositories, by which non-peer reviewed data may legitimately enter the public domain and the Code should be altered to reflect this.

### **3.4 Suggested changes (continued)**

- 3.4.8 Several respondents pointed out that it is not always poor practice to delay publication of research. In some disciplines, a period of a couple of years is common before research is published.
- 3.4.9 It was suggested that the duty of researchers to publish the findings of all clinical research involving human participants be clearly stated in the Code.
- 3.4.10 It was requested that the section on peer review be broadened to encompass all of the situations in which it is used, including review of grant applications.
- 3.4.11 A number of respondents asked for clarification of the guidance on avoidance of duplicate submission/ publication without disclosure and appropriate acknowledgement.

### **4.0 Next steps**

- 4.1 The rate of response to the consultation on the draft Code of Practice was excellent and the vast majority of responses were positive about the Code. The respondents considered the questions asked in a thorough and helpful manner and made very useful comments on the development of the publication.
- 4.2 Since the conclusion of the consultation, UKRIO has been considering the issues that were raised, paying particular attention to those areas of the Code which were considered by some to be unclear or excessively prescriptive. The draft document is now being revised based on the responses received in the consultation, with a view to launching the Code to the research community in 2009.
- 4.3 It is the intention of UKRIO that the Code will be reviewed regularly, initially on an annual basis. UKRIO will actively seek feedback from organisations and researchers on the current edition, to inform the review.
- 4.4 To that end, the Code will be published as an online document on the UKRIO website ([www.ukrio.org](http://www.ukrio.org)), as well as hard copy and PDF versions. This online Code will include a mechanism for the research community to submit feedback on specific sections and suggest new developments in good practice in research for inclusion. Organisations and researchers will be recommended to check the UKRIO website for the annual updates to the Code.
- 4.5 As already stated, UKRIO has been aware for some time that many in the UK research community would prefer more uniformity and clarity in guidance on the conduct of research and is working with other organisations to address this issue. UKRIO is liaising with bodies such as Research Councils UK, the Department of Health and Universities UK, with a view ultimately to streamline guidance on good practice in research, to ensure that it is clear for the research community, and to avoid duplication of effort. Further developments will be made known to the research community as they occur.
- 4.6 UKRIO would like to thank again the individuals and organisations who participated in the consultation for their contribution to the development of the Code of Practice for Research.