

Policy PL86 - Research Integrity Policy

Date Approved:	4/12/2022	Version:	1
Effective Date:	4/12/2022	Policy Author:	Head, Research Governance, Risk and Compliance
Review Date:	2025	Policy Owner:	Head, Research Governance, Risk and Compliance
Status:	Approved	Approval Authority:	
Key Words:		Department:	Governance, Risk & Compliance

Key Points

All WEHI Personnel are responsible for maintaining the highest standard of research integrity.

Researchers must make themselves aware of and abide by the requirements of [The Australian Code for the Responsible Conduct of Research 2018](#) (Code) and accompanying Guides, this policy and associated documents.

WEHI will support research integrity by providing training and support and investigate research integrity concerns and resolve disputes.

1. Purpose

The purpose of this policy is to prescribe the standards of responsible and ethical research conduct required by WEHI and its researchers, and to facilitate compliance with [The Australian Code for the Responsible Conduct of Research \(2018\)](#) (Code) and supporting Guides.

2. Scope

This policy applies to all staff, students, contractors, consultants, volunteers (including honorary appointments) (collectively, **Personnel**).

This policy applies to all research conducted at or by a person in their capacity as a WEHI Personnel member.

3. Definitions

Term	Definition
Breach or Breach of the Code	<p>Breach of the Code is defined as a failure to meet the principles and responsibilities of the Code and may refer to a single breach or multiple breaches. Breaches can occur on a spectrum, from minor (less serious) to major (more serious). In considering the seriousness of a breach, factors to be considered include:</p> <ul style="list-style-type: none"> • the extent of the departure from accepted practice • the extent to which research participants, the wider community, animals and the environment are, or may have been, affected by the breach • the extent to which it affects the trustworthiness of research • the level of experience of the researcher • whether there are repeated breaches by the researcher • whether institutional failures have contributed to the breach • any other mitigating or aggravating circumstances. <p>Repeated or persistent breaches will likely constitute a serious breach.</p>
Code	The Australian Code for the Responsible Conduct of Research (2018)

Term	Definition
Conflict of Interest	Where a research worker may be unduly influenced by other interests. This refers to a financial or non-financial interest which may be a perceived, potential or actual conflict of interest.
Financial involvement	Any direct or indirect financial interest, provision of benefits (such as travel and accommodation) or provision of materials or facilities.
Indirect financial interest	A financial interest or benefit derived by the researcher workers' relatives, personal or business associates, or research students.
Procedural fairness	<p>The principles of procedural fairness apply to managing and investigating potential breaches of the Code. WEHI's process for managing and investigating potential breaches must be proportionate, fair, impartial, timely, transparent, and confidential.</p> <p>More information about these principles can be found in the Code.</p>
Research misconduct	Research misconduct is defined as a serious breach of the Code's principles and responsibilities as outlined in 4.1 , which is also intentional or reckless or negligent. If proven, research misconduct would lead to disciplinary action by WEHI.
Research	The creation of new knowledge and/or the use of existing knowledge in a new and creative way so as to generate new concepts, methodologies, inventions and understandings. This could include synthesis and analysis of previous research to the extent that it is new and creative.

4. Policy

4.1 Standards and commitment

WEHI is committed to the principles and responsibilities outlined in the Code which are listed below. In addition, all WEHI Personnel are to act consistently with WEHI's values and policies in place at the time that the conduct took place.

Responsible conduct of research principles

There are eight principles referred to on **page 2** of the [Code](#). These principles are the hallmarks of the responsible conduct of research.

WEHI Personnel must adhere to the principles in all aspects of their research. A breach of any one of these Principles will amount to a breach of the Code and may result in an investigation or sanctions.

1. **Honesty** in the development, undertaking and reporting of research
2. **Rigour** in the development, undertaking and reporting of research
3. **Transparency** in declaring interest and reporting research methodology, data and findings
4. **Fairness** in the treatment of others
5. **Respect** for research participants, the wider community, animals and the environment
6. **Recognition** of the right of Aboriginal and Torres Strait Islander peoples to be engaged in research that affect or is of particular significance to them
7. **Accountability** for the development, undertaking and reporting of research
8. **Promotion** of responsible research practices

WEHI's commitment as an Institution

WEHI commits to:

- providing adequate resourcing to support excellence in integrity at WEHI, including establishing specialist integrity roles
- actively promoting and adhering to research integrity
- and consistent with the Code will:

- Establish and maintain good governance and management practices for responsible research conduct.
- Identify and comply with relevant laws, regulations, guidelines and policies related to the conduct of research.
- Develop and maintain the currency and ready availability of a suite of policies and procedures which ensure that institutional practices are consistent with the principles and responsibilities of the Code.
- Provide ongoing training and education that promotes and supports responsible research conduct for all researchers and those in other relevant roles.
- Ensure supervisors of research trainees have the appropriate skills, qualifications and resources.
- Identify and train Research Integrity Advisors who assist in the promotion and fostering of responsible research conduct and provide advice to those with concerns about potential breaches of the Code.
- Support the responsible dissemination of research findings. Where necessary, take action to correct the record in a timely manner.
- Provide access to facilities for the safe and secure storage and management of research data, records and primary materials and, where possible and appropriate, allow access and reference.
- Facilitate the prevention and detection of potential breaches of the Code.
- Provide mechanisms to receive concerns or complaints about potential breaches of the Code. Investigate and resolve potential breaches of the Code.
- Ensure that the process for managing and investigating concerns or complaints about potential breaches of the Code is timely, effective and in accord with procedural fairness.
- Support the welfare of all parties involved in an investigation of a potential breach of the Code.
- Base findings of investigations on the balance of probabilities and ensure any actions are commensurate with the seriousness of the breach.

Responsibility of researchers

WEHI researchers are required to adhere to policies available on the [WEHI Policy and Procedures Portal](#). WEHI supports the Code and requires that researchers:

- Support a culture of responsible research conduct at their institution and in their field of practice.
- Provide guidance and mentorship on responsible research conduct to other researchers or research trainees under their supervision and, where appropriate, monitor their conduct.
- Undertake and promote education and training in responsible research conduct.
- Comply with the relevant laws, regulations, disciplinary standards, ethics guidelines and institutional policies related to responsible research conduct.
- Ensure that appropriate approvals are obtained prior to the commencement of research, and that conditions of any approvals are adhered to during the course of research.
- Ensure that the ethics principles of research merit and integrity, justice, beneficence and respect are applied to human research.
- Engage with Aboriginal and Torres Strait Islander peoples and respect their legal rights and local laws, customs and protocols.
- Ensure that the 3Rs (Replacement, Reduction and Refinement) are considered at all stages of research involving animals and minimise the impacts on animals used in research and in so doing support the welfare and wellbeing of these animals.
- Adopt methods appropriate to the aims of the research and ensure that conclusions are justified by the results.
- Retain clear, accurate, secure and complete records of all research including research data and primary materials. Where possible and appropriate, allow access and reference to these by interested parties.
- Disseminate research findings responsibly, accurately and broadly. Where necessary, take action to correct the record in a timely manner.
- Disclose and manage actual, potential or perceived conflicts of interest.
- Ensure that authors of research outputs are all those, and only those, who have made a significant intellectual or scholarly contribution to the research and its output, and that they agree to be listed as an author.
- Acknowledge those who have contributed to the research.
- Cite and acknowledge other relevant work appropriately and accurately.
- Participate in peer review in a way that is fair, rigorous and timely and maintains the confidentiality of the content.
- Report suspected breaches of the Code to the relevant institution and/or authority

4.1.1 Adherence to NHMRC Guides

The Researcher Responsibilities articulated in the Code are supported by Guides on specific aspects of research conduct. WEHI Personnel who conduct research must make themselves familiar and act consistent with the following NHMRC guides and related WEHI Policies:

- Authorship
- Peer review
- Supervision
- Collaborative Research
- Publication and Dissemination of Research

- Management of Data and Information in Research
- Disclosure of Interests and Management of Conflicts of Interest

4.2 Roles and responsibilities

The following roles have been nominated for the management of research integrity at WEHI and **Managing and investigating potential breaches of WEHI's research conduct standards Procedure**.

More information on the scope of these roles is included in the **Managing and investigating potential breaches of WEHI's research conduct standards Procedure**.

Responsibility	Position
Responsible Executive Officer (REO)	Deputy Director
Designated Officer (DO)	Head, Research Integrity, and Ethics (Faculty)
Assessment Officer (AO)	Research Ethics, Governance and Integrity Manager
Research Integrity Advisors (RIA)	Experienced researchers from across WEHI
Review Officer (RO)	A legal practitioner appointed by Corporate Counsel. A procedural review by the Australian Research Integrity Committee (ARIC) may be requested by a respondent or complainant.

Appointment of Research Integrity Advisors

Research Integrity Advisors at WEHI provide advice on research integrity to those with a question or concern about research conduct, including how to make a formal complaint about a potential breach of the Code. The Director (or their delegate) appoints the Research Integrity Advisors, in consultation with the Head, Research Integrity and Ethics (Faculty).

The appointment of Research Integrity Advisors must:

- consider diversity and inclusion
- include researchers across a variety of different research areas
- include people with expertise and experience in animal and human ethics.

Conflicts of interest management

Ensuring that there is confidence in the integrity review process, conflicts of interest should be managed conservatively.

Management of conflicts should refer to the [Conflict of Interest Policy](#).

Actual conflicts of interest

A person nominated for the management of a complaint should not participate in any aspects of an investigation if they have an actual conflict of interest. An alternative person will be nominated to fulfill the responsibility required under the Code.

An actual conflict may relate to a supervisory role, a financial interest, a personal relationship, or a research relationship. Guidance on conflicts can be sought from the Corporate Counsel.

Perceived or potential conflicts of interest

Where a position under this policy has a perceived or potential conflict, steps must be put in place to manage the conflict to provide transparency and ensure impartiality and that confidence in the process is not undermined.

The Corporate Counsel can provide guidance on the management of these issues.

4.3 Human and animal ethics

The WEHI Animal Ethics Committee and Human Research Ethics Committee fulfil specific roles under legislation and NHMRC requirements. The Ethics Office should be notified if a complaint relates to incidents that affect the welfare of animals or may constitute a non-compliance with an approved AEC or HREC project.

Where a complaint or an inquiry relates to an activity that could harm humans, animals, or the environment, the WEHI Ethics Office must be contacted, and immediate action taken to minimise harm.

4.4 Collaborative research across multiple institutions and jurisdictions

WEHI Personnel must adhere to the principles and responsibilities under the Code and relevant WEHI policies when undertaking collaborative research. The investigation of potential breaches that involves multi-institutional collaborations will be considered on a case-by-case basis with reference to:

- the lead institution
- where the complaint was lodged
- contractual arrangements
- where the events occurred
- local research practices and guidelines for conducting investigations in foreign countries.

WEHI is committed to cooperating with partner institutions to ensuring that only one investigation is conducted, where possible and appropriate. The process of that investigation should be agreed to in writing. Where an agreement cannot be reached WEHI may conduct its own investigation.

Approval

The WEHI Director is responsible for approving the proposed action in these cases.

4.5 Breaches of this policy

The process for managing breaches under this policy will depend on the nature of the breach.

Breaches that relate to the Code will be follow the procedure under **Managing and investigating potential breaches of WEHI's research conduct standards Procedure**.

4.6 Fraud, corruption, and criminal behaviour

Where a WEHI Personnel has concerns that a breach under this policy involves fraud, corruption, or criminal activity, they must advise Corporate Counsel to determine next steps.

WEHI takes incidents of fraud, corruption and criminal behaviour seriously and will escalate these cases to the appropriate body when necessary.

4.7 Reporting

Reporting to AEC and HREC

The Research Integrity Office will inform the Ethics Office where there is a complaint of a potential breach of the Code that involves an approved animal or human project.

Reporting to the Director

The Research Integrity Office is to inform the Director within 48 hours of a formal integrity complaint where there is an immediate risk.

The Director will consider the facts of the case and determine whether and when the Board is to be informed.

Reporting to Ethical Practice and Research Integrity Committee

The Research Integrity Office is to prepare a report for each meeting of the Ethical Practice and Research Integrity Committee on matters relating to this policy including aggregate statistics on inquiries and complaints.

Notifications under agreements

NHMRC

WEHI will notify the NHMRC in accordance with the [NHMRC Research Integrity and Misconduct Policy 2019](#).

Other

Where a formal complaint is made, WEHI will identify any additional reporting requirements relating to funding or other agreements to ensure that reporting obligations are met.

Statistics

As a minimum, the Research Integrity Office must maintain a record of the following statistics

- number of research integrity inquiries – by topic
- formal integrity complaints – by topic
- number of integrity investigations
- summary of outcomes

Information shared for reporting purposes must be deidentified.

4.8 Record keeping

Appropriate records must be kept of all inquiries and investigations in a secure location with restricted access.

All records must be managed consistently with WEHI's Privacy [Policy](#) and [Procedures](#).

5. Supporting Information

5.1. References

The Australian Code for the Responsible Conduct of Research (2018) and associated Guides

NHMRC Research Integrity and Misconduct Policy 2019

Health Records Act 2001 (Vic)

Privacy and Data Protection Act 2014 (Vic)

Public Records Act 1973 (Vic)

Foreign Influence and Interference Laws

other legislation as applicable to WEHI

5.2. Related Policies

[Fraud Control Policy](#).

[Gifts and Anti-bribery Policy](#).

[Animal Research incident Management Policy](#).

[Human Research Policy](#).

[Conflict of Interest Policy](#).

[Distribution of Net Commercial Income Policy](#).

[Dispute Resolution Policy](#).

[Appropriate Workplace Behaviour Policy](#).

[Whistleblower Policy](#).

5.3. Related Procedures

Managing and investigating potential breaches of the Code Procedure

Animal Welfare and AEC Complaints Procedure

[Conflict of Interest Procedure](#)

Review Cycle

Initial Review	3 Years
Ongoing Review	3 Years
Next Review	2025

Version History

Approved By	Approval Date	Effective Date	Approval Notes	Version
Director	4/12/2022	4/12/2022	New Policy	1