

Implementing Research Integrity Governance Frameworks



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Improving people's health through research and information

Areas covered

- Scope of governance structures
- Core requirements of a governance structure
- Governance framework- overview
- Governance scenarios– advantages and challenges
- European examples
- Role of ENRIO

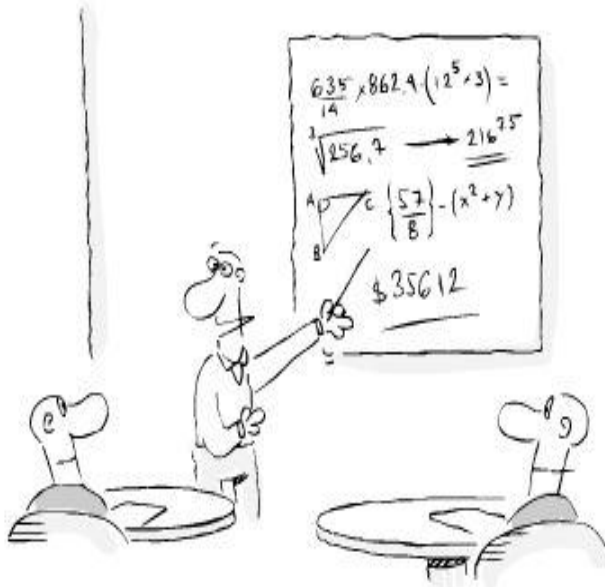


Governance Frameworks

Reach and Scope

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"Frankly, I guessed the results..."

- Both scientific and scholarly research
- Ideally, publicly and privately funded research
- Should encompass core issues of misconduct, (Fabrication, Falsification, Plagiarism),
- Should also included other misconduct (see OECD list) although extent is grey area
- At very least, instances of misconduct that are deliberate or grossly negligent should be included



Core requirements

Operational/functional

Core element	Comments	Accountability
Agreement on definitions	Will be dependent on scope & conception of misconduct being considered i.e. how to deal with misconduct & "bad practice"	International National
National mandate	Charter or legislation - can draw on other country experience or international guidelines	National Local
Consistency with national laws	Issues of overlapping regulations, already existing legislation need to be taken into account	National
Fair and transparent processes	Processes at both local and national level - critical to have balance between prevention and sanction in processes	National Local
Responsibility for managing processes	Decision must be taken at both local and/or national level - needs to include responsibility for both prevention and implementation of investigations	Local Could also be national
Acceptance of procedures for dealing with allegations	Each country will have to look at the best process for this, depending on their individual structures	Local National International

Core requirements

Individuals/institutions

Core element	Comments	Accountability
Ensure that procedures for investigation are legally robust	Guidelines/processes - should enshrine minimum legal standards concerning the individual.	Ideally national but could be local
Clarify procedures for receiving concerns or allegations	From whom, how (anonymous, named), in what form and to whom should allegations/concerns be raised?	Ideally national but could be local
Agreement on transparency of misconduct investigations	Clarity about obligation/desirability of local procedures to reveal incidences to 3 rd parties (press, national oversight bodies, funders)	Currently local Ideally national
Decide on levels of appeal	2 types of appeal - concerning the scientific and the procedural elements of investigation	Local National
Decide on sanctions and responsibility for enforcement	Local level for most part. Committee may recommend but management must enforce	Local
Protection of whistleblowers	Identify mechanisms of protections the reputation and career of whistleblowers	Local National


Core requirements

Changing the culture

Core element	Comments	Accountability
Mechanisms for embedding GRP into culture of scholarship	Education and awareness at all levels – undergrad, post-grad and employee.	Local National
Clarify relationship between national/international and local system	Interaction of local and national/international processes need to be clear and understood	Local National International
Procedures for pooling case information	Agreement on sharing of knowledge between local and national, and between national and international -	Local National International
Identify where guidance can be sourced by researchers and other stakeholders	Can be provided by national body and/or international organisation e.g. ENRIO, experience and publications of national ROIs	National and local



Governance Frameworks

	Level at which framework operates	Type of structure/supporting guidelines & policies	Responsibility for implementation
High  Low	1. No structures	No guidelines on handling of allegations of misconduct	Dependent on peer review to identify issues
	2. Individual institutions	Guidelines adopted locally for GRP and handling of allegations of misconduct	Either ad hoc or standing committee
	3. Agency/Professional Body	Policy/guidelines for GRP and handling of allegations of misconduct proposed by funding agencies/body	Local standing committee and/or national committees convened by agency
	4. Local with national oversight	Policy/guidelines agreed nationally for handling of allegations of misconduct.	National Body oversight but local implementation through standing committee
	5. National	National legislation/charter approach to GRP and handling of allegations of misconduct	National Office or Standing Committees

Framework 1:

No agreed framework

Advantages	Challenges/ risks	Enhancements/ESF contribution
<ul style="list-style-type: none"> • Fresh eyes • Open minded peers 	<ul style="list-style-type: none"> • Risk of public scepticism against research where cases are not adequately handled • Reputational damage • Significant monetary cost where case emerges • Loss of time when case occurs - investigations starting from scratch • May affect research funding - lack of public confidence • No support for whistleblowers • Deterrent effect reduced • Lost opportunity for common learning or accumulation/sharing of experience 	<ul style="list-style-type: none"> • Individuals or groups may initiate change • Serious case may motivate change in process • ESF member organisations can champion more formal frameworks in their countries



Framework 2:

Individual institutional

Advantages	Challenges/ risks	Enhancements/ESF contribution
<ul style="list-style-type: none"> • Knowledge of local circumstances • Link between education and research less defined locally • Visibility of integrity issues enhanced locally • Self-control endorses local responsibility and leadership 	<ul style="list-style-type: none"> • Institutional or personal conflicts of interest if investigations are ‘in-house’ • Self-policing may mitigate against impartiality • May have interest in hiding cases or dealing with issues behind closed doors • Lost opportunity for common learning or accumulation/sharing of experience • Different guidelines/procedures/outcomes in different institutions • No higher appeal mechanism • May be difficult to whistle-blow • Coverage only locally 	<ul style="list-style-type: none"> • Composition of local committee needs to be defined and representative • Authority of committee needs to be clear and broad • External/independent input preferable • Process in steps to reflect type and degree of misconduct • External expertise may be required – legal, scientific • Training of committee formally and by experience • Learning from international experience and guidelines • Need to invest in prevention at all levels

Framework 3:

Agency/professional body

Advantages	Challenges/ risks	Enhancements/ESF contribution
<ul style="list-style-type: none"> • Standardised guidelines and procedures • Formulated and accepted by peers • Establishes relationship between funding and GRP 	<ul style="list-style-type: none"> • Acceptance of guidelines depends on acceptance of agency/professional body • Coverage may only extend to researchers funded by agency • Agencies may not be set up to monitor compliance locally • Responsibility for implementation may still reside locally with attendant challenges/risks 	<ul style="list-style-type: none"> • Leadership role for ESF member organisations in developing guidelines and procedures



Framework 4:

National oversight/local implementation

Advantages	Challenges/ risks	Enhancements/ESF contribution
<ul style="list-style-type: none"> • Effective coordination of local processes • Common guidelines and procedures nationally • Provides a higher appeals mechanism • Less opportunity to hide cases if they must be reported to national coordinator • Provides support and advice to institutions • Coverage of both public and commercial activity possible 	<ul style="list-style-type: none"> • Investigation remains local with attendant challenges/risks (conflict of interest, impartiality etc) • Acceptance of guidelines depends on local buy-in • Difficulties with demarcation of local and national authority • Dependent on willingness and commitment to exchange information between local and national • Institutions may perceive national coordination as interference 	<ul style="list-style-type: none"> • ESF can provide knowledge and guidelines to members to being back to their own country • Learning from implementation in other countries



Framework 5:

National implementation

Advantages	Challenges/ risks	Enhancements/ESF contribution
<ul style="list-style-type: none"> • Consistent national guidelines • Authority for GRP and investigations clear • National standing committees can reach professional competence • Potential for coverage of ALL research activity • Provides true independence for investigation process • Equality in access and treatment of cases • Easier to avoid conflict of interest • Facilitates international cooperation 	<ul style="list-style-type: none"> • Danger of lack of responsibility being taken at local level • Perceived loss of autonomy at local level • Fear of the consequences of interference by national bodies • Institutions may not have resources to provide training and education at the standard set nationally • Resourcing and location of national office may be politically influenced 	<ul style="list-style-type: none"> • Learning from implementation in other countries • Opportunity to establish links with other national offices through ESF and ENRIO



European Examples

Country	Agency/ Professional Body	Local wt National oversight	National
Croatia			✓
Denmark			✓
Finland		✓	
France	✓		
Germany	✓		
Hungary		✓	
Ireland	✓		
Latvia	✓		
Netherlands		✓	
Norway			✓
Poland	✓		✓
Spain	✓		
Sweden		✓	
Switzerland	✓		
UK		✓	

RI Governance in practice

Agencies/Professional bodies

Country	Organisation	Role	Scope/ Limitations
Ireland	Health Research Board	Advisory	HRB funded research. Rely on institutions to have mechanisms in place for dealing with misconduct
Germany	Deutsche Forschungsgemeinschaft (DFG) Ombudsman's Service + Max Planck Society	Advisory and investigatory	Require institutions to have mechanisms in place for dealing with misconduct. Investigatory in DFG or MPS funding only
Switzerland	Swiss Academies of Arts and Science in collaboration with Swiss National Science Foundation	Advisory, oversight and investigation	All publically funded research. Local investigation supported by legislation



RI Governance in practice

Local with national oversight

	Organisation	Role	Scope/ Limitations
Netherlands	National Board on Scientific Integrity (LOWI) (Secretariat in National Academy of Arts and Sciences)	Advisory, oversight and appeals	All universities and institutions under LOWI umbrella. Voluntary. Private sector not included
UK	UK Panel for Research Integrity in Health and Biomedical Sciences (UKRIO)	Advisory and oversight	Covers only health and biomedicine – public and private sector. Proposed National Advisory Body for all disciplines
Finland	Finish National Research Ethics Board	Advisory and appeals	University. Voluntary sign-up



RI Governance in practice

National Body

Country	Organisation	Role/Mandate	Scope/ Limitations
Norway	National Commission for the Investigation of Scientific Misconduct	Advisory and investigatory. National legal jurisdiction	All public and private sector institutions
Denmark	Danish Committees on Scientific Dishonesty	Investigatory, may proactively take cases. National legal jurisdiction	All public sector institutions and universities
USA	Office of Research Integrity	Advisory, oversight, investigatory, regulatory. National legal jurisdiction	Public Health Service institutions worldwide. Does not cover private sector





Role of ENRIO

European Network of Research Integrity Offices

- Information sharing from cases/issues
 - To inform policy development
 - Guide education and training
 - Identify common issues and trends
- Liaise with other initiatives (e.g. ESF, OECD)
- Share practical systems experience
- Share developments in promotion and prevention



Thank you for your attention

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