
Integrity, Clarity & Good Management - Code of Conduct and Policy on the Governance of Good Research Conduct

Response by the Wellcome Trust

October 2008

Introduction

1. The Wellcome Trust is the largest charity in the UK. It funds innovative biomedical research, in the UK and internationally, spending over £600 million each year to support the brightest scientists with the best ideas. The Wellcome Trust supports public debate about biomedical research and its impact on health and wellbeing.
2. The Wellcome Trust expects the researchers it funds to adhere to the highest standards of integrity. To facilitate this, we expect all researchers to meet our Guidelines on Good Research Practice, and we have also drawn up a Statement on the Handling of Allegations of Research Misconduct.¹
3. We welcome the initiative of Research Councils UK (RCUK) to develop a draft Code of Conduct ('the Code') and to encourage harmonisation of frameworks for implementing and monitoring good research conduct and research integrity. The main points we would like to highlight in our response are as follows:
 - Individual Research Organisations must be responsible for their own good governance, and we support them in ensuring that robust processes are in place to promote best practice.
 - We agree that it would be useful to establish national standards for a code of conduct and accompanying procedures to ensure good research practice. A national advisory body may therefore be valuable, to provide advice and coordinate activities. However, we urge that this should not be a regulatory body or one that seeks to police misconduct across institutions.
 - We do not believe that the UK Research Integrity Office (UKRIO) in its current form could fulfil the role of providing this national advisory service, as such a body would require a broader remit, be multidisciplinary and have strong, clear leadership.
 - Any national standards must take account of the best international standards and examples of best practice across the globe. This is particularly important as research increasingly involves global collaboration, and research funders increasingly operate internationally.
 - Education and training will be key to encourage good conduct, but we recognise that this will require additional support and investment. We encourage RCUK to seek out examples of best practice in training, and to consider appropriate models for providing funding to change behaviour.

¹ <http://www.wellcome.ac.uk/About-us/Policy/Policy-and-position-statements/WTD002753.htm>

Are you broadly content with the draft Code of Conduct set out in Section 3?

4. We are broadly content with the draft Code as set out in Section 3. We support the emphasis on integrity rather than focusing on poor research conduct, which is consistent with the approach the Trust has taken. We particularly endorse the statement that it is the responsibility of the researcher to establish they have met the highest standards, and agree that the principle of encouraging and supporting best practice, starting at undergraduate level, is imperative.
5. We also support the suggested role of research employers in ensuring that sound systems are in place to promote best practice. The Wellcome Trust expects institutions to have in place their own published standards of good research practice as a condition of funding, and we agree with the suggested list of processes that this should include.
6. We welcome the inclusion of a list of activities that might be considered as misconduct, and agree with the suggested categories. In relation to 'misrepresentation', we would suggest that care needs to be taken in relation to the definition of "presenting flawed interpretation of data". Scientific development relies on debating the validity of data and hypotheses – an interpretation that is later found to be wrong would not of itself constitute misconduct, unless it has clearly been negligently or knowingly misrepresented.
7. In the section on 'Management and preservation of data and primary materials', we suggest greater emphasis should be placed on openness and sharing of data as essential for good research conduct. Recent cases have highlighted the importance of the ability to reproduce data.² The OECD Global Forum also concluded that withholding data from the scientific community should constitute misconduct.³ The Trust strongly advocates the importance of openness and accessibility to research findings, and we would suggest that the benefits of open access as good research conduct should be included in the Code.⁴
8. We also recommend the inclusion of guidance on conflicts of interest in the Code. Recent cases in the US⁵ are illustrative of the concern in this field. Furthermore, the First World Conference on Research Integrity identified this as an area of concern.⁶

Are you broadly content with the proposed outline procedures for Management of Good Research Conduct, and Reporting and Investigation of Allegations of Misconduct in Section 4 and Appendix 1?

9. We agree that all research organisations (ROs) must have procedures in place for the reporting and investigation of allegations of misconduct. Indeed, it is a condition of Wellcome Trust grants that host institutions in the UK and the Republic of Ireland must have in place formal written procedures for the investigation of such allegations.⁷

² See Nature, Vol, 455 16 October 2008 p.849 where a paper in *Blood* is to be retracted due to inability to reproduce results.

³ Organisation for Economic Co-operation and Development Global Science Forum, *Best Practice for Ensuring Scientific Integrity and Preventing Misconduct*, based on a Workshop held on 22-23 February 2007, Tokyo, Japan p 3.

⁴ See the Trust's policy: <http://www.wellcome.ac.uk/About-us/Policy/Policy-and-position-statements/WTD002766.htm>

⁵ See Nature 455 16 October 2008 p.835 where Emory University researchers underreported contributions from industry.

⁶ European Science Foundation, Science Policy Briefing *Research Integrity: Global Responsibility to Foster Common Standards* December 2007 p 7

⁷ See: <http://www.wellcome.ac.uk/About-us/Policy/Policy-and-position-statements/WTD002756.htm>

10. While we recognise that individual institutions are responsible for establishing and implementing good research conduct and investigating any breaches of its guidelines, we support the need to move towards greater harmonisation and standardisation of procedures across the UK. We would therefore encourage RCUK to work with UKRIO, funders and ROs to develop one set of standards that applies across the UK, both in public and private research organisations. This should take into account the best international standards.
11. We agree with the proposed list of procedures to be included, as set out in Section 4. However, we are not clear how the proposals fit with the document recently published by UKRIO on 'Procedure for the Investigation of Misconduct in Research'. We recommend there is a need for greater clarity, and suggest that further work is needed to ensure that there is just one consistent code of conduct and guidance.
12. We welcome the focus given to education and training to encourage good conduct and believe that this should commence at an early stage of career development. We support the need for continuing education, and suggest that Continuing Professional Development courses in ethics and good research conduct should be offered to research professionals. While institutions must take a lead on providing such training, we recognise that there will be significant resource implications to ensure appropriate delivery. We encourage RCUK to give careful consideration to ways of supporting such training. The Higher Education Innovation Fund, and funder mandates to encourage open access publishing provide examples of different models to change behaviour through appropriate investment and incentives.
13. With increasing numbers of global research collaborations, it will also be important to ensure that visiting scientists from other countries are made aware the Codes of Conduct and requirements when partnering and carrying out research in the UK.

Are you broadly context with the suggestions about distinguishing different levels of poor research conduct as set out in the Annex to Appendix 1?

14. Whilst it would appear helpful to have some agreed standard against which to rank levels of misconduct, we would warn against arbitrary application of such levels and their application in formal disciplinary proceedings. Instead, we would encourage training and support to foster the highest levels of best practice rather than the introduction of minimum standards.

Do you consider that there is need for the development of a National Advisory Body as set out in Section 4?

15. As discussed above, we agree that there would be benefit in establishing national standards, guidance and procedures to ensure best practice in research conduct. We can therefore see the value of a national body to coordinate and advise on standards, disseminate material and promote best practice across institutions, and to provide a central contact point for advice when carrying out investigations. Principles and practices promulgated by such a body should reflect international best practice.
16. However, we would strongly argue that there is no need – nor indeed appetite – for the establishment of any additional national regulatory bodies to enforce good research practice. It would not be appropriate for a national body to have a policing role. Instead we would suggest that existing frameworks should be utilised to obtain consensus on best practice codes of conduct and disciplinary procedures. We believe UKRIO could have a role to play in supporting best practice, however we have concerns as to whether, in its current form, it could fulfil the role of a national advisory body. Such a body would require a broader remit, should be multidisciplinary and have a strong leadership and respect from public and private research institutions. We would be pleased to discuss the structure and governance of such a body further with RCUK and other stakeholders.
17. In regard to the creation of a central repository of misconduct cases, there may be some value in a global database, which could assist in identifying repeat offenders or cases of serious misconduct when recruiting globally.

18. We agree that there is a role for funders to play in strengthening the current framework for good research conduct. For example, the Trust could encourage ROs to adopt agreed standardised principles, or even make them a requirement of funding if appropriate. However, we maintain that ROs, as employers of researchers, are ultimately responsible for managing the process for good research conduct, including investigations into misconduct. Neither RCUK, nor other sponsors, should be involved in governance issues which should remain the responsibility of the RO.
19. As discussed above, there is also a need for funding to provide appropriate training to promote and support good research conduct. We encourage RCUK to consider models of funding, and also to seek out examples of best practice in training in the UK, US and internationally. It would be useful to have a better understanding of what exists already in order to build on existing initiatives and to identify potential gaps. We would also suggest that funding may need to be provided for training and mentoring to improve study design and research practice.
20. It has been proposed that editors and journals have a role to play in reporting misconduct which can be identified in publications, such as use of modified images and plagiarism. The role of open access in identifying occurrences of plagiarism should also be considered.

Do you have any other comments on the proposals in general or in detail?

21. As mentioned in section 2.9 of the Consultation paper, the Trust shares concerns about the paucity of robust evidence about the extent and scope of misconduct in the UK. We acknowledge that it is very difficult to evaluate the extent of under-reporting, but suggest there is a need to collect better data. The Trust would be happy to work with RCUK, UKRIO and others to develop ways to address these issues.
22. We encourage RCUK to work closely with other stakeholders to ensure the development and implementation of a Code for Good Research Conduct. In order to ensure a wide uptake of the Code, it will be important to engage with research funders, ROs, Universities UK, and other stakeholders from an early stage, and to work together to achieve broad consensus about standards and procedures. It will also be important to ensure that any UK code reflects international standards of best practice.
23. We continue to encourage all stakeholders involved in research to promote and foster good research conduct and research integrity. This should include training in ethics and robust reporting, and ensuring appropriate procedures for investigations of allegations of research misconduct.