



UNIVERSITY *of* LIMERICK

OLLSCOIL LUIMNIGH

Research Integrity Policy

Approved by Academic Council December 2016

1. Introduction

1.1 The University is committed to ensuring that all research carried out under its auspices meets the highest standards of integrity, and that an environment of research integrity prevails through the promotion of good research practices, together with the use of fair, effective, and transparent procedures to address research misconduct.

1.2 Research integrity relates to the performance of research to the highest standards of professionalism and rigour, and to the accuracy and integrity of the research record in publications and elsewhere.

2. Scope

2.1 This policy upholds both the 'University of Limerick Code of Conduct for Employees', which applies to all employees of the University and the Code of Conduct as per Section 6 of the 'University of Limerick Handbook of Academic Regulations and Procedures', which applies to all persons studying at the University that are in place at the time.

2.2 This policy is aligned with the [National Policy Statement on Ensuring Research Integrity](#) in Ireland (2014) (hereafter 'National Policy Statement'), which has been adopted by the Irish Universities Association and other stakeholders including the University of Limerick. This policy is also aligned with the [European Code of Conduct for Research Integrity](#) (hereafter 'the European Code').

2.3 This policy applies to all employees of the University, and to all Adjunct, Emeritus, and visiting personnel officially engaged in research work at the University and/or undertaking any research activity in the University's name.

2.4 Where students are undertaking research on behalf of the University of Limerick, their Principal Investigator/Supervisor shall have responsibility for ensuring that the students undertake appropriate training in research integrity

- Principal Investigator: A Principal Investigator is an employee of the University who has primary responsibility for the design, implementation, completion and management of a research project.
- Supervisor: A Supervisor is an employee of the University who is assigned to a postgraduate research candidate at the time of their commencement of a postgraduate research project. The supervisor has responsibilities relating to the postgraduate's academic and research activities as described in Section 5 of the 'University of Limerick's Handbook of Academic Regulations and Procedures' (Research Postgraduate Academic Regulations).

2.5 The term 'researcher' is used throughout this policy to refer to any or all of the above categories as appropriate.

2.6 Events may occur where there is possible infringement of this policy by a person who is not an employee of the University and therefore not subject to the 'University of Limerick Code of Conduct'; such cases should be addressed by the respective employer. The University reserves the right to commence legal proceedings in such cases.

3. Principles of Research Integrity

3.1 The 'European Code' specifies eight basic principles that underpin all research integrity and good practice in carrying out research, and which the University endorses. These are principles that all scientific and scholarly researchers should observe directly in performing their own individual research, in dealings with research partners, and in dealings with the audience that receives their research reports. The principles are:

- **Honesty** in presenting research goals and intentions, in precise and nuanced reporting on research methods and procedures, and in conveying valid interpretations and justifiable claims with respect to possible applications of research results.
- **Reliability** in performing research (meticulous, careful and attentive to detail), and in communication of the results (fair and full and unbiased reporting).
- **Objectivity:** interpretations and conclusions must be founded on facts and data capable of proof and secondary review; there should be transparency in the collection, analysis and interpretation of data, and verifiability of the scientific reasoning.
- **Impartiality and independence** from commissioning or interested parties, from ideological or political pressure groups, and from economic or financial interests.
- **Open communication**, in discussing the work with other scientists, in contributing to public knowledge through publication of the findings, in honest communication to the general public. This openness presupposes a proper storage and availability of data, and accessibility for interested colleagues.
- **Duty of care** for participants in and the subjects of research be they human beings, animals, the environment or cultural objects. Research on human subjects and animals should always rest on the principles of respect and duty of care.
- **Fairness**, in providing proper references and giving due credits to the work of others, in treating colleagues with integrity and honesty.
- **Responsibility for future science generations.** The education of young scientists and scholars requires binding standards for mentorship and supervision.

4. Good Research Practice

4.1 In addition to the principles of Research Integrity, the University has identified the following research practices as being essential for promoting and safeguarding a culture of research integrity:

- **Openness** Whilst recognising the need for researchers to protect their research interests in the process of planning their research and obtaining their results, the University encourages researchers to be as open as possible in discussing their work with other researchers and the public, provided that such actions are compatible with sponsor terms. In line with National and EU Policy the researcher should also understand the need to protect any Intellectual Property (IP) arising from their research that has potential to create economic value. Once results have been published, the University encourages researchers to make available relevant data and materials to others on request, or to provide sufficient clear information to enable the research findings to be replicated, provided that this is consistent with any ethics approvals and consents which cover the data and materials and any IP rights in them.
- **Leadership and Cooperation** Within the University it is the responsibility of the President and the Deans of the Faculties, Heads of Departments, senior staff, Principal Investigators and Supervisors to ensure that a climate of mutual cooperation is created

which allows research to be conducted in accordance with good research practice. Within a research Institute/centre/group, responsibility lies with the Institute/centre/group leader. Institute/Centre/Group leaders, and Principal Investigators/Supervisors must also ensure that appropriate direction of research, and that supervision of researchers, and research students, is provided. It is the responsibility of Heads of Departments to clearly convey the standards and protocols for research in their Departments and to ensure that adherence to these standards is integral to the life of the Department.

- **Documenting Results and Storing Primary Data** All research data and records should be securely stored and managed in accordance with good data/record management practice as set out in the [‘University’s Records Management & Retention Policy’](#). Where Data Protection requirements apply to research data/records (e.g. personal information) then such data/records should be managed in accordance with the Data Protection Acts, [‘University of Limerick Data Protection Policy’](#) and any supporting Data Protection Compliance Regulations.
- **Publication** The University requires where possible, that research results are published in an appropriate form, usually as papers in peer-reviewed journals, or books or book chapters with impactful publishers. Publication should occur in a timely fashion. Researchers should familiarise themselves with the [Authorship and Publications for Research Guidance](#) document as well as the norms and standards that may be applicable to their discipline.
- **Conflict of Interest** The University is committed to the principle that the activities of its researchers should not give rise to situations in which its researchers have, or appear to have, conflicts of interest. In accordance with the [‘Conflicts of Interest Protocol’](#) and [‘Procedures related to Research Activities at University of Limerick’](#), the primary obligation rests with the researcher to recognise situations in which he or she has an existing and/or potential conflict of interest, and to disclose and discuss that conflict with his/her Dean/Head of Department/Line Manager (or head of the Institute/Centre/Group).
- **Ethical Practice** Research which seeks to involve human participants (including data collected on an anonymous basis), biological samples etc. (a full list of the types of research which require research ethics approval are set out in the [‘University of Limerick Procedures for Research Ethics Approval’](#)) must have prior approval from the relevant Research Ethics Committee. Once approved, the research must be conducted in line with the conditions, if any, of such approval. In addition, researchers should ensure that research involving any identifiable personal data is carried out in a manner which fulfils the legal requirements of the Data Protection Act 1988 & 2003 and the Freedom of Information Act 2014.
- **Training** The University will make available appropriate training courses. It is the responsibility of the Heads of Departments, Institute/Centre/Group leaders, and Principal Investigators/Supervisors to ensure that all researchers have the opportunity to receive appropriate research training including attendance as necessary on relevant courses and guidance from professional bodies. In this regard, the needs of new researchers are of paramount importance; responsibility for ensuring that new researchers (including students) understand and adopt best research practice as quickly as possible rests with all Heads of Departments, Institute/Centre/Group leaders, and Principal Investigators/Supervisors. Continuing education on research integrity should also be provided through mentorship by senior investigators responsible for the supervision/training of PhDs and postdoctoral researchers alike.

5. Research misconduct

5.1 Research misconduct is harmful for knowledge. The University will take action, in accordance with Appendix I 'Procedure for Managing Misconduct in Research' to address instances of alleged research misconduct in order to protect the integrity of both research and the University.

5.2 Research misconduct does not include honest error or honest difference in the design, execution, interpretation or judgement in evaluating research methods or results or misconduct unrelated to the research process. Similarly it does not include poor research per se unless such research encompasses an intention to deceive.

5.3 In keeping with the National Policy Statement, the University is guided by the OECD description of misconduct by scientists and scholars as per Appendix II 'OECD description of types of misconduct by scientists and scholars.' Research misconduct includes, but is not limited to:

- **Fabrication of data** i.e. making up results and recording or reporting them.
- **Falsification of data** i.e. manipulating research, materials, equipment or processes, or changing or omitting data or results such that the research is not accurately represented in the research record.
- **Plagiarism** i.e. the appropriation of another person's ideas, processes, results, or words without giving appropriate credit, including those obtained through confidential review of other's research proposals and manuscripts.

Each one of these comprises an attack on the integrity of the research record and as such, must be vigorously defended against.

5.4 There are also additional types of poor practices which, while not as serious as Fabrication, Falsification, and Plagiarism (FFP) in individual instances, may be present and therefore (in the aggregate) potentially as damaging to the overall reputation of research and the research community's integrity. These poor practices include but are not limited to:

- **Data-related misconduct** e.g. not preserving primary data, poor data management and/or storage;
- **Personal misconduct in the research setting** e.g. inadequate mentoring of next generation of researchers and scholars, inappropriate personal behaviour;
- **Research practice misconduct** e.g., harmful, dangerous or unethical research methods.
- **Publication-related misconduct** e.g. claiming undeserved authorship, denying authorship to contributors, artificially proliferating publications;
- **Financial and other misconduct** e.g. peer review abuse, non-disclosure of a conflict of interest, misrepresenting credentials;

5.5 It must be demonstrated that the research misconduct was committed intentionally, knowingly or recklessly. Proof must be based on the preponderance of evidence.

6. Research Integrity Officer

6.1 In accordance with the National Policy Statement, the President of the University will appoint a **Research Integrity Officer (RIO)**. He/she will act as the University's first point of contact for receiving allegations of research misconduct, will fulfil the functions outlined in

the Procedure for Managing Misconduct in Research as per Appendix II as well as other functions in accordance with the National Policy Statement.

6.2 To allow for cases where the appointed RIO has a potential/real conflict of interest, or is otherwise unable to fulfil the function at a certain time, the President of the University may also appoint a formally nominated alternate.

6.3 The RIO will not be involved in deciding whether individual allegations of research misconduct should be upheld. He/she will have a co-ordinating and compliance role ensuring that the Procedure for Managing Misconduct in Research is followed, and may provide administrative support to an investigation committee. He/she may be consulted by the President on a course of action to take after findings have been made by an investigation of an allegation of research misconduct.

6.4 The term of appointment of a RIO will typically be between 3 and 5 years and will not normally be held on a full time basis. The University may appoint a staff member to provide support to the RIO function, which may include day to day delegated management of the responsibilities outlined in 6.3.

Relevant UL Policies and Procedures

- [UL Code of Conduct for Employees](#)
- [UL Handbook of Academic Regulations and Procedures](#)
- [UL Data Protection Policy & UL Data Protection Compliance Regulations](#)
- [UL Records Management and Retention Policy](#)
- [Authorship and Publications for Research Guidance Document](#)
- [Conflicts of Interest Protocol and Procedures related to Research Activities at University of Limerick](#)
- [Freedom of Information](#)
- [UL Procedures for Research Ethics Approval](#)
- [Guidelines on Insurance Cover for Research](#)
- [Risk Management Policy](#)

Relevant External Sources

- [National Policy Statement on Ensuring Research Integrity in Ireland](#)
- [European Code of Conduct for Research Integrity](#)

Appendix I

Procedure for Managing Misconduct in Research

1. Allegations

1.1 Allegations of possible research misconduct should be made in writing and addressed to the Research Integrity Officer (RIO). Any person receiving an allegation about research misconduct should refer the complainant to the Research Integrity Officer.

1.2 In the event that the RIO is a) the subject of the allegation or b) is conflicted in any way regarding the nature or source of the allegation, the RIO will inform the President who will instruct the nominated alternate to fulfil the role of the RIO in this procedure from this point onwards.

1.3 All allegations will be treated with fairness, sensitivity and respect. The RIO will acknowledge receipt of the allegation within five working days and will advise the complainant of the procedure to be followed.

1.4 While the University will endeavour to comply with all the timelines outlined in this Procedure, these may be extended in exceptional circumstances.

2. Stage 1: Preliminary inquiry

2.1 Following receipt of an allegation, the RIO will conduct a preliminary inquiry. The objective of this preliminary inquiry is to determine, as confidentially as possible, whether the allegation falls within the definition of research misconduct. The preliminary inquiry shall be limited to determining whether there is sufficient evidence of research misconduct to proceed with a full investigation.

2.2 The RIO may be assisted in the inquiry by internal and/or external experts if required.

2.3 The preliminary inquiry should be complete and a written record of findings should be prepared within 30 working days of its initiation. If the 30-day deadline cannot be met, a report should be filed citing progress to date and the reason for the delay and the complainant and President should be informed.

2.4 The RIO may also, at his/her discretion choose to conduct a preliminary inquiry of an anonymous allegation, depending on the seriousness of the issues, the credibility of the allegation, and the feasibility of confirming the allegation with credible sources.

2.5 Following the preliminary inquiry, the RIO will provide the complainant with a written determination summarising the reasons for the decision reached following the preliminary inquiry:

- If the RIO determines that the allegation does not fall within the definition of research misconduct, the allegation is then dismissed. The RIO may advise the complainant of other policies or procedures through which he/she could pursue their issue. No further action is taken under this procedure.
- If the RIO determines that the allegation falls within the definition of research misconduct, an investigation is warranted.

2.6 The RIO will notify the President and the Vice President Research of this determination once the preliminary inquiry is complete.

2.7 Where the respondent is not subject to the University's disciplinary procedures, the RIO may, following consultation with the Corporate Secretary, notify the Gardaí [if appropriate] or other institutions, which have a legitimate, material interest in the outcome, of the matter. Depending on the circumstances, the continued use of the University's premises and facilities by the respondent may be suspended or curtailed by the RIO following consultation with the Corporate Secretary.

2.8 There is no right of appeal against the determination of the RIO made following the preliminary inquiry since it refers to preliminary procedures only. Respondents will have a right of appeal under the appropriate disciplinary procedures in the event that further action is taken.

2.9 Depending on the nature of the allegation, the University may take actions to ensure that any potential risk or harm to staff, research participants or other persons, any potential suffering to animals or negative environmental consequences (where this may contravene the law or fall below good practice) is reduced. These actions may involve informing legal or regulatory authorities about the allegation. Any such actions should not be interpreted as pre-empting the findings of a subsequent investigation, and will be carried out in as confidential a manner as possible. The RIO will oversee these actions to ensure that they are appropriate and proportionate. Actions under this paragraph can be taken at any point in this procedure, once the preliminary inquiry has concluded.

3. Stage 2: Investigation

3.1 The objective of an investigation is to determine whether or not, on the balance of probabilities, the alleged research misconduct occurred. Proof of research misconduct must be based on the preponderance of evidence.

3.2 Where the respondent is a student, the investigation will take place under the procedures and timescales detailed in the 'Handbook of Academic Regulations and Procedures'. The RIO, in consultation with the Vice President Academic and Registrar, will notify the University Advocate of the allegation and the findings of the preliminary inquiry to initiate this process.

3.2 In order for the University to comply with the commitments of the 'National Policy Statement' regarding collaboration for continuous improvement, and to protect the research integrity framework of the University, the Vice President Academic and Registrar will inform the RIO of the findings and outcomes of any investigation into alleged research misconduct by a student, and subsequent appeals taken under the 'Handbook of Academic Regulations and Procedures'.

3.3 The investigation into the alleged research misconduct will be carried out under Statute No. 4 or other approved policies with investigative procedures, where the respondent is:

- an employee of the University;
- an emeritus member of staff engaged in research under the auspices of the University;

- an adjunct member of staff in receipt of pay;
- visiting personnel in receipt of pay

The RIO in consultation with the Vice President Research, will notify the Director HR of the allegation and the findings of the inquiry to initiate this process.

3.4 In order for the University to comply with the commitments of the 'National Policy Statement' regarding collaboration for continuous improvement, and to protect the research integrity framework of the University, the Director HR will inform the RIO of the findings and outcomes of any investigation into alleged research misconduct by a researcher as described in 3.3, and subsequent appeals taken under Statute no. 4 or other approved policies with investigative procedures.

3.5 It is a requirement that all parties involved maintain confidentiality. Information is, however, subject to any limits or disclosure requirements imposed by law, by this procedure or by the Freedom of Information Act 2014 and the Data Protection Acts 1988 & 2003.

4. Appeals

4.1 The University will provide for an appeals process in respect of an investigation into alleged research misconduct in accordance with approved University appeals procedures.

5. External Notification

5.1 In accordance with the 'National Policy Statement', the RIO will notify relevant external parties of research misconduct allegations which have been upheld after an investigation and, where it occurs, an appeal. External parties may include funding bodies and publishers, and any other stakeholders who the RIO, in consultation with the Vice-President Research deems appropriate.

5.2 In accordance with the 'National Policy Statement', the RIO will collate the information record of the investigation and, where it occurred, the appeal, and subsequently report on the investigation and, where it occurred, the appeal with internal contacts and external organisations where appropriate.

6. Policy Review

6.1 This procedures document will be reviewed as appropriate

Appendix II¹

OECD description of types of misconduct by scientists and scholars

Core “Research misconduct”	Research practice misconduct
<ul style="list-style-type: none"> • Fabrication of data • Falsification of data • Plagiarism <p>FFP normally includes: Selectively excluding data from analysis Misinterpreting data to obtain desired results (including inappropriate use of statistical methods) Doctoring images in publications Producing false data or results under pressure from a sponsor</p>	<p>Using inappropriate (e.g. harmful or dangerous research methods) Poor research design Experimental, analytical, computational errors Violation of human subject protocols Abuse of laboratory animals</p>
Data-related misconduct	Publication related misconduct
<p>Not preserving primary data Bad data management, storage Withholding data from the scientific community NB: the above applies to physical research materials too</p>	<p>Claiming undeserved authorship Denying authorship to contributors Artificially proliferating publications Failure to correct the publication record</p>
Personal misconduct in the research setting	Financial, and other misconduct
<p>Inappropriate personal behaviour, harassment Inadequate mentoring, counselling of students Insensitivity to social or cultural norms</p>	<p>Peer review abuse e.g. non-disclosure of conflict of interest, unfairly holding up a rival’s publication Misrepresenting credential or publication record Misuse of research funds for unauthorised purchases for personal gain Making an unsubstantiated or malicious misconduct allegation</p>

¹ Reproduced and amended from OECD publication ‘Best practices for ensuring scientific integrity and preventing misconduct.’ <http://www.oecd.org/sti/scienceandtechnologypolicy/40188303.pdf>