

## **1994 Group response to the RCUK consultation:**

### **‘Governance of Good Research Conduct: Consultation on a Code of Conduct and Policy’.**

**24 October 2008**

The following forms the response of the 1994 Group to the RCUK, ‘Governance of Good Research Conduct: Consultation on a Code of Conduct and Policy’.

For detailed responses to the individual questions raised in the consultation document, please see the submissions from individual member institutions.

Members of the 1994 Group are: University of Bath; Birkbeck, University of London; Durham University; University of East Anglia; University of Essex; University of Exeter; Goldsmiths, University of London; Lancaster University; University of Leicester; Loughborough University; Queen Mary, University of London; Royal Holloway, University of London; University of Reading; University of St Andrews; School of Oriental and African Studies; University of Surrey; University of Sussex; and University of York.

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

The 1994 Group supports the general principles behind RCUK’s proposals for this Code of Conduct and Policy on the Governance of Research Conduct.

However, there is some concern amongst member institutions regarding the proliferation of such codes amongst research funding and policy bodies in recent years. It would be useful for RCUK to clarify whether the draft code is intended to replace or supplement the codes and guidelines already produced by the individual Research Councils, and we urge RCUK to take all possible steps to avoid the generation of contradictory advice and guidance. It would be of value to place the document within the wider context of existing guidance, such as a consideration of the relationship between what is proposed and the role of the UK Research Integrity Office (UKRIO).

Much of the work so far has been conducted while concentrating on health and biomedical sciences, but any universal guidance would need to take account of the range of disciplines within UK HEIs. Matters of good conduct in research are often subject specific and staff and students should not be made to undergo any training that is not relevant.

The major practical issue in implementing the code is likely to be the long-term preservation of data. Storing the data in such a way that it is accessible, searchable and interpretable will be particularly challenging and would likely impose a strain on resources in research teams and across institutions.

**2. 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?**

There is broad support for the outline procedures for management of good research conduct and for reporting and investigating misconduct. The attention to training, development and mentoring is particularly welcome.

Again, however, care should be taken in considering how these national standards would fit alongside existing guidance, and a clear articulation of the need for more would be welcome.

We feel that the document should strike a balance between warning against bad conduct and promoting good conduct. It is important to distinguish in this section between the two commonly identified levels of bad practice: Fabrication, Falsification and Plagiarism (FFP) as opposed to Poor Research Practice (PRP). It should be the goal of all research organisations to have good practice well-embedded within their research conduct, in order to avoid PRP, while at the same time highlighting the seriousness of more deliberate misdemeanours such as FFP.

**3. Are you broadly content with the suggestions about distinguishing different levels of poor research conduct as set out in the annex to Appendix 1?**

The definitions of the different levels of poor research conduct are thought-provoking and useful for institutions to use as a guideline, but member institutions question the value of formally defining these levels and rigidly applying them to processes. In practice individual cases of misconduct will not be clear cut, and such a scale could produce unintended consequences, such as a disproportionate effect on future career prospects following lower levels of misconduct.

The key factor to consider in regards to research misconduct is whether it is deliberate (such as FFP) or non-deliberate (such as PRP), and the objective of having a scale of sub-levels beneath this overall distinction needs to be clarified.

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

There is concern amongst member institutions with the proposal for the introduction of a National Advisory Body. The potential benefits are recognised, that if it ran effectively it could collate robust evidence of the scale of the problem of misconduct, act as a link between HE and other relevant sectors, and address the lack of a UK-specific evidence base. However, there is concern that such a body would increase the amount of extra bureaucratic constraints and administrative burden on institutions and that merit may be lost under the weight of procedure.

Tom Norton  
Director, Internal Policy Development  
1994 Group