National Research Ethics Committees

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Comments from National Research Ethics Committees (FEK) on the review of the ALLEA code

With reference to the e-mail of 31 October 2022 from ENRIO, Bert Seghers, to members of the European Network of Research Integrity (ENRIO).

ENRIO has been formally invited by the European Federation of Academies of Sciences and Humanities (ALLEA) to comment on its draft for the update of the European Code of Conduct for Research Integrity. For this task, ENRIO has asked ENRIO members to offer their feedback to ENRIO.

As a Norwegian member of ENRIO, the National Research Ethics Committees in Norway (FEK) appreciates the opportunity to contribute to the development of the ALLEA document through ENRIO.

FEK has the following comments and suggestions. The blue text indicates added or revised text:

Preamble
We suggest adding the following text after the first sentence on page 3:

Research is the quest for knowledge obtained through systematic study and thinking, observation and experimentation, and it benefits society and humanity through the advancement of knowledge. Research is an indispensable prerequisite for our social, cultural, political and economic resilience and progress. The research community has responsibilities towards society and universal welfare and should ensure that research is trustworthy. While […]"

Reasoning: In our opinion it is important to highlight that research is about more than "the quest for knowledge […]", including the responsibilities towards society and universal welfare, and that research should be trustworthy. Some of the suggested text is from the Bonn Declaration on Freedom of Scientific Research.

Further, we suggest adding text related to the 2011 version of the code to the text in the last paragraph. We therefore suggest replacing the last paragraph with the following text:

The European Code of Conduct for Research Integrity was first developed in 2011 by the European Federation of Academies of Sciences and Humanities (ALLEA) and the European Science Foundation (ESF), and was revised by ALLEA in 2017. It has now been updated to take account of evolving concerns and emerging areas so that it can continue to serve the research community as a framework for good research practice.

Reasoning: This ensures consistency with the text on page 15 and that the document's history is better represented in the text.

Principles

We suggest adding the following text as the first text beneath the heading:

Fostering integrity in research presupposes a collective commitment to the core values and guiding principles of good research practices (`the ethos of science´). Responsible conduct of research includes both research integrity and research ethics. In research ethics a distinction should be made between two categories of issues: problems related to science and society, emphasising the socio-ethical *context* of research, and problems related to scientific integrity, emphasising standards when *conducting* research. This document will not deal with this wider ethical *context* of science, but focuses on the second category, the responsible *conduct* of research.[1]

Reasoning: The concepts of research integrity and ethics are the central concepts in the document but have not been defined or explained. We believe it is important to clarify that research integrity presupposes a concept of research ethics, and thus a collective commitment in the research community to certain values and principles. It is also important that the document to underlines the different aspects of research ethics. Some of the suggested text is from the European Code of Conduct for Research Integrity, which was developed in 2011 by ALLEA and the European Science Foundation (ESF).

We would further suggest adding two principles to the list and we also suggest a minor change to the order and to replace "are" with "include":

1 The European Code of Conduct for Research Integrity developed in 2011 by the European Federation of Academies of Sciences and Humanities (ALLEA) and the European Science Foundation (ESF), "ALLEA 2011", p. 7–11.

These principles include:

- ***Responsibility*** towards society and universal welfare
- ***Impartiality*** and independence from coercion by powerful persons and institutions, religious or political pressure, or economic or financial interests
- ***Reliability*** in ensuring the quality of research, reflected in the design, methodology, analysis and use of resources
- ***Honesty*** in developing, undertaking, reviewing, reporting and communicating research in an open, transparent, fair, full and unbiased way
- ***Respect*** for colleagues, research participants, society, ecosystems, cultural heritage, and the environment
- ***Accountability*** for the research from idea to publication, for its management and organisation, for training, supervision and mentoring, and for its wider impacts

Reasoning:

- The list of principles is not exhaustive, and we therefore suggest replacing "are" with "include".
- Responsibility should be included as it describes the commitment of researchers to the wider impacts of their research, emphasising the socio-ethical *context* of research. This should be distinguished from *Accountability* as a principle below, which is formulated as a backward-looking principle, whereas *Responsibility* is a forward-looking concept that expresses the aims of science.
- Impartiality was removed from ALLEA 2011 but should be included again to underline the broader understanding of ethics as explained above. The sentence is paraphrased from ALLEA 2011, page 10. Given the emphasis on citizen science in the document, and increased collaboration across sectors, institutions and nations, and therefore potential pressure on independence in research, it is even more important to include impartiality as a core principle.
- The order should be changed so that it better reflects the order of the research process and the principles that should be included at various stages.

2.1 Research Environment

We suggest adding internal threats to the fourth bullet point, as follows:

- Research institutions and organisations defend researchers who are subject to external and internal threats and protect whistleblowers, taking into account that early career and temporarily employed researchers may be particularly vulnerable.

Reasoning: Internal threats are a real threat that should also be mentioned here.

2.4 Safeguards

We suggest that the heading is replaced with "**2.4 Ethical safeguards**".

Reasoning: To avoid the title of the chapter being too technical when the main content is about ethics.

We further suggest that the first bullet point is replaced by the following:

- Researchers comply with codes, guidelines, regulations and ethical review requirements relevant to their discipline.

Reasoning: To make the list complete.

We also suggest removing "sensitive" from the second bullet point:

- Researchers handle research subjects (be they human, animal, cultural, biological, environmental or physical) and related data with respect and care, and in accordance with legal and ethical provisions.

Reasoning: Researchers should handle data responsibly, sensitively, or not, and it makes little sense to use the term "sensitive" for data not related to human beings.

2.5 Data Practices and Management

We suggest that the order of the words "protocols" and "data" in the first, third and fifth bullet point is changed. We also suggest adding "codes":

- Researchers, research institutions and organisations ensure appropriate stewardship and curation of all protocols, data, software, codes and research materials, including unpublished ones, with secure preservation for a reasonable period.

- Researchers, research institutions and organisations are transparent about how to access and gain permission to use protocols, data, software, codes and research materials.

- Researchers, research institutions and organisations acknowledge protocols, data, software, codes and research materials as legitimate and citable products of research.

Reasoning: To ensure that the order is complete and chronological.

2.8 Reviewing, Evaluating and Editing

We suggest including "institutions" in the first bullet point, as follows:

"Researchers and research institutions take their commitment to the research community seriously by participating in refereeing, reviewing and evaluation, and this work is acknowledged by the research community."

Reasoning: This is not only the responsibility of individual researchers, but also the responsibility for research institutions.

3. Violations of Research Integrity

We suggest that the heading is replaced by the following:

"**3. Research Misconduct and other Unacceptable Practices**"

Reasoning: The term "integrity" is used in at least three different senses in the document: (1) as an overarching term that refers to the ethos of science, cf. preamble; (2) as a term that refers to specific actions, cf. this heading; and (3) as a term that refers to a process, cf. 3.2. It is more appropriate to use the terms "research misconduct and other unacceptable practices" here, since in this context, the focus in on conduct/practices. By dividing the content here into two parts it becomes clearer that research misconduct and other unacceptable practices are two different issues.

We also suggest that this part of Chapter 3 is divided into two parts: part 3.1 and part 3.2, as follows:

"It is of crucial importance that researchers master the knowledge, methodologies and ethical practices associated with their field. Failing to follow good research practices violates professional responsibilities. It damages the research processes, degrades relationships among researchers, undermines trust in and the credibility of research, wastes resources and may expose research subjects, users, society or the environment to unnecessary harm.

3.1 Research Misconduct

Research misconduct is traditionally defined as fabrication, falsification or plagiarism (the so-called FFP categorisation) in proposing, performing or reviewing research, or in reporting research results:

- ***Fabrication*** is making up results and recording them as if they were real.

- ***Falsification*** is manipulating research materials, equipment or processes or changing, omitting or suppressing data or results without justification.

- ***Plagiarism*** is using other people's work and ideas without giving proper credit to the original source, thus violating the rights of the original author(s) to their intellectual outputs.

These three forms of violation are considered particularly serious since they distort the research record.

3.2 Other Unacceptable Practices

There are further violations of good research practice that damage the integrity of the research process or of researchers. In addition to direct violations of the good research practices set out in this Code of Conduct, examples of other unacceptable practices include, but are not confined to:

…"

Reasoning: By dividing the content here into two parts it becomes clearer that research misconduct and other unacceptable practices are two different issues.

As a consequence of the above suggestion, it is necessary to change the number of the heading "3.2 Dealing with Violations and Allegations of Misconduct" to:

"3.3 Dealing with Violations and Allegations of Misconduct"

We further suggest, as for Chapter "3.3 Dealing with Violations and Allegations of Misconduct", to delete the two subheadings "Integrity" and "Fairness".

Reasoning: It seems somewhat arbitrary to use such subheadings when the content covers more than integrity and fairness. The subheading "integrity" is potentially misleading since the text is really about the integrity of the process, which is not the same as research integrity.

Annex 1: Key Resources

Finally, we suggest adding the following to the list of key resources:

Directive 2010/63/EU of the European Parliament and of the Council of 22 September 2010 on the protection of animals used for scientific purposes: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32010L0063

International Science Council, Freedom (2014). Responsibility and Universality of Science. https://ethz.ch/content/dam/ethz/special-interest/usys/ias/grassland-sciences-dam/documents/Education/RespConduct/CFRS-brochure-2014.pdf

Ministerial Conference on the European Research Area (2020). Bonn Declaration on Freedom of Scientific Research.
https://www.bmbf.de/bmbf/shareddocs/downloads/files/_drp-efr-bonner_erklaerung_en_with-signatures_maerz_2021.pdf?__blob=publicationFile&v=1

UNESCO "Recommendation on Science and Scientific Researchers":
https://en.unesco.org/themes/ethics-science-and-technology/recommendation_science

United Nations "Universal Declaration of Human Rights" article 27.1:
https://www.un.org/en/about-us/universal-declaration-of-human-rights

Reasoning:
These are all relevant reference documents for this code.

Please let us know if any of our suggestions need further explanation or justification. We wish you the best of luck in developing a joint answer from ENRIO.

On behalf of the National Research Ethics Committees,

Yours sincerely,

Helene Ingierd

General Director