

EUROPEAN GROUP ON ETHICS IN SCIENCE AND NEW TECHNOLOGIES

Statement on the formulation of a code of conduct for research integrity for projects funded by the European Commission

The EGE welcomes the importance of all European Commission actions to promote the highest standards of scientific integrity in all research that is funded through its own programmes.

The EGE will not be directly involved in the formulation of a Code of Good Scientific Practices, but it believes that the following considerations provide a set of elements that should be addressed in any such code.

1. The EGE recognises that to define Good Scientific Practice for participants in European projects is important and especially complex due to the large number of participants in most research projects sponsored through the Horizon 2020 programme and other research initiatives of the European Union due to their multi-national character.
2. A way to make explicit the commitment of all partners to these standards could be to require adherence to a Code of Good Scientific Practice and Research Integrity defined in the contracts of the research projects.
3. Codes of Conduct for Scientific Research exist in many European countries and research institutions. They respond to the needs of particular disciplines, to the legal system of each country or to specific traditions. It may be useful to have a general reference for European contracts. A possible example may be the one proposed by ESF-ALLEA on an European Code of Conduct for Research Integrity:
http://www.esf.org/fileadmin/Public_documents/Publications/Code_Conduct_Research_Integrity.pdf
4. European funded projects are unusual in that they often involve many actors from different institutions, including universities, research institutions, small and medium sized enterprises and large companies. In addition, many of the projects involve actors from multiple countries, including both EU member states and other countries.

5. These organisations may have widely different cultures. Integrity in relation to the manner in which the research is conducted (and its results disseminated) may therefore be of even greater importance than for other forms of funding.
6. Scientific misconduct is a matter of concern for all the actors involved in research. A procedure devoted to the analysis of any indication of misconduct and to the identification of the participants responsible for irregular behaviour should be put into practice. That system should include **specific protection** of whistle-blowers. The institutions that are the contractors with the European Commission have a responsibility to act to ensure integrity
7. **Academic freedom** within academic institutions has been an important cornerstone for the furtherance of research and scholarship for centuries. It is important that researchers have the freedom to question and test received wisdom and to put forward new ideas and controversial or unpopular opinions without placing themselves in jeopardy of losing their jobs or the privileges they may have'. It is crucial that the freedom to conduct research and scholarship, teach, speak, and publish without interference or penalty is respected and maintained.
 - a. It is important that the freedom to conduct and interpret research that forms part of the culture of universities and research institutions is not compromised by their association with industry or commerce or any other grouping where priorities may
 - b. Contracts should specify what curtailment if any is imposed on openness, the reasons for this curtailment, and timeline during which some curtailment is deemed necessary. This timeline should not be excessive
 - c. **All** data that forms the basis of any publication must be available to all those involved and named as authors of the publication.
 - d. Negative results must, at the very least, be considered for publication and where a decision is made not to publish, the reasons must be part of the report to the Commission on the progress of the funded project
 - e. Enough information about research should be published or placed in repositories to enable those skilled in the particular discipline to reproduce published results.
8. Any code of practice should consider the manner in which it affects *inter alia*:
 - a. **Institutions** at which research is undertaken, and who have contractual responsibility for the research conducted by researchers within the institution
 - b. **Principal researchers** and their responsibilities to their institution and for their colleagues and all staff working in the 'unit' for which they exercise responsibility
 - c. **Junior or other members of staff** who are responsible to the principal researchers and may have responsibilities for the mentoring of students, research scientists and others that work with them
 - d. The **relationships** between research in an institution and other academic institutions at which work is undertaken in relation to multi-institution projects.

- e. The **relationship** between research in an institution and private companies at which work is undertaken in relation to any projects partially or wholly funded by private organisations.
 - f. Responsibilities of **students** in developing data and the responsibilities of their mentors to assure that they are properly supervised and recognised.
9. All participants in the project should acknowledge their **compliance with existing regulations and practice** regarding scientific practice in relation to:
- a. Human subjects and materials from human origin, in particular where clinical trials are part of the project.
 - b. Data regarding humans: Where appropriate, researchers, institutions and consortia must define policies relating to the confidentiality of data including assuring the anonymity of any human research subjects, including where necessary the encryption of personal data. Appropriate action must be taken to protect the safety of participants and researchers.
 - c. Experiments with animals
 - d. Activities that involve the deliberate release of genetically modified organisms.
 - e. Any other regulation existing in the Member State where the work will be carried out.
 - f. Where research funded by the European Union is undertaken in a non-member state, all the regulatory requirements must at the very least conform to the norm set by Europe, and must also meet the requirements of the State in which the research is carried out
 - g. Transfer of material between non-member states and member states must be undertaken according to EU norms
 - h. Data transferred between member states and non-member states must conform to EU data protection requirements
10. The responsible conduct of research includes the **proper management and retention of the research data**.
- a. All researchers, institutions and consortia must have a formal procedure for ensuring the retention of data and for defining the ownership of such data, including policies to ensure retention of data in the event of researchers leaving the institution or consortium.
 - b. Data and materials produced from European projects should be available to any other scientists wishing to reproduce the results obtained. Specific conditions regarding confidentiality of commercial use may exist.
 - c. Whenever this is feasible, raw data from European projects should be kept for a specified period after the completion of the project.
 - d. Where the culture of a participating organisation is more hierarchical than may be normal within an academic institution the contract should specify how data are to

be disseminated and ensure that enough is placed in the public domain to ensure that the conclusions may be justified.

11. Results from European projects should be the object of **publication** in an open and accurate manner avoiding over-interpretation of results. Scientific publications follow a number of conditions that have to be fulfilled in all cases.
 - a. The authors of the publications have to correspond to those that have a material or intellectual contribution to the results published without any improper omission or inclusion of authors. The order of authors has to be agreed and it has to correspond to the normal uses of the field.
 - b. Possible conflicts of interest and sources of funding for the publications have to accurately be described in the publications
 - c. Publication of results must not be unduly delayed, given the rules of the contracts or to preparation of applications for intellectual property protection
 - d. All those involved in the development of intellectual property must be named in any application for protection.
12. The Code of Conduct should also include a description of what it is considered to be **proper research procedures**. It includes
 - a. Rules for proper design and execution of projects
 - b. Ways of proper managing of resources
 - c. Avoidance of any misconduct as manipulation or fabrication of data or plagiarism.
13. All Institutions (individually and collectively) participating in European research programmes should adhere to the Human Resources Strategy defined by the European Union.
14. Rules of procedure that would apply in cases of scientific misconduct must form part of any contract approved under the Horizon 2020 programme. In addition, a list of sanctions must be available to the participants that would eventually be found responsible for them. These could include restrictions to future access to research projects calls, and any sanctions that might be relevant within an academic institution or within a company. Frameworks for resolving possible breaches of the code within one of the funded organisations for both the institution and the research group, between such organisations, and in particular, amongst institutions with differing managing and responsibility structures should be provided. Analysis of different cases of misconduct should take into consideration the traditions of different scientific disciplines and the legal systems of different countries. When analysing specific cases of misconduct the European Commission may consider creating its own office and working in connection with the offices already existing in different countries organized in ENRIO (European Network of Scientific Integrity Offices).