

## HRB Policy on Research Misconduct

### 1. Introduction

The Health Research Board is committed to ensuring high standards of research integrity and good practice in the research that it funds and fully endorses the *National Policy Statement on Ensuring Research Integrity in Ireland*.<sup>1</sup>

As part of this, researchers are expected to follow international guidelines on [good research practice](#) and relevant HRB [policies](#), including HRB Policy on Bullying and Harassment<sup>2</sup>, and HRB Policy on ethics and the use of animals in research<sup>3</sup>. HRB also expects HRB Host Institutions to follow the *National Policy Statement on Ensuring Integrity in Ireland*, and those outside Ireland to follow appropriate guidelines of a similar standard.

### 2. Definitions

The HRB subscribes to the *National Policy Statement on Ensuring Research Integrity in Ireland* definitions of research misconduct and unacceptable research practices, which are based on the “European Code of Conduct for Research Integrity”<sup>4</sup> and the OECD “Best practices for ensuring scientific integrity and preventing misconduct”<sup>5</sup>. These definitions encompass serious misconduct, namely fabrication, falsification, and plagiarism, which damage the scientific record, as well as a range of unacceptable research practices in the assessment, design, conduct, reporting and publication of research and in personal behaviour and responsible grant management, that damage the integrity of the research process or of researchers.

While unacceptable research practices are generally best dealt with through prevention, training, supervision and mentoring, nonetheless in their most serious forms they may be sanctionable. Therefore, while this HRB policy is primarily concerned with research misconduct, the organisations that HRB funds are expected to take seriously concerns raised about unacceptable research and their responsibilities to create a positive research environment that facilitates positive researcher behaviour.

This does not include honest errors or differences of opinion about execution or interpretation when evaluating research design, methods or results.

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<sup>1</sup> <https://www.iaa.ie/wp-content/uploads/2019/08/National-Policy-Statement-on-Ensuring-Research-Integrity-in-Ireland.pdf>

<sup>2</sup> HRB Policy on Bullying and Harassment - <https://www.hrb.ie/funding/funding-schemes/before-you-apply/all-grant-policies/>

<sup>3</sup> HRB Policy on ethics and the use of animals in research - <https://www.hrb.ie/funding/funding-schemes/before-you-apply/all-grant-policies/>

<sup>4</sup> <http://www.allea.org/wp-content/uploads/2017/03/ALLEA-European-Code-of-Conduct-for-Research-Integrity-2017-1.pdf>

<sup>5</sup> <http://www.oecd.org/science/inno/40188303.pdf>

### 3. Responsibilities of the Host Institution

In line with the HRB Terms and Conditions of funding, and guidelines developed by the National Forum for Research Integrity<sup>6</sup>, it is the responsibility of HRB host institution to:

1. Have policies and procedures in place that clearly set out:
  - the standards of behaviour it expects from all staff, students, and contractors
  - their procedure for responding to allegations of research misconduct
  - a named point of contact for receiving allegations

The policies and procedures should be available to all staff and should be easily located on the website of the host institution.

2. Ensure that there is an equivalent policy in place at any sub-awardee organisation, if relevant.
3. Respond promptly and in confidence to allegations of research misconduct. Allegations of misconduct should be investigated in an impartial, fair and timely manner.
4. Take appropriate actions where an allegation of misconduct is upheld.
5. As per the HRB Grant Terms and Conditions, alert the HRB Director of Research Strategy and Funding ([misconductpolicy@hrb.ie](mailto:misconductpolicy@hrb.ie)) about any allegation of misconduct against a participant in HRB-funded research that is upheld. This should only happen once the full internal investigative process is complete, including any appeal.

The information that should be provided to the HRB includes:

- the name of the person against whom the allegation has been upheld
- a brief factual statement about the nature of the allegation
- a brief factual statement on the outcome of the investigation, including any sanctions, and any other information that is deemed relevant, on a case-by-case-basis.

The HRB does not need to receive any sensitive personal information about any party to the allegation. Allegations that are not upheld should not be reported to the HRB.

6. Any information provided to the HRB by the Host Institution will be:
  - Stored in accordance with data protection legislation and GDPR requirements
  - Communicated on a need-to-know, restricted-access basis only
  - Updated and/or deleted in line with our retention policy

### 4. Responsibilities of the HRB

The HRB does not directly investigate allegations of research misconduct. Complainants should not contact the HRB directly with allegations that are the responsibility of the Host Institution to process. Therefore, if an allegation of misconduct is made to the HRB rather than to the relevant HRB Host Institution we will refer the individual making the complaint (complainant) to their Host Institution. The Host Institution is then responsible for enacting their processes and procedures for handling allegations of research misconduct.

The HRB does not carry out its own investigations, but may, as part of its audit process:

- check that the HRB Host Institution has policies and processes in place and that these are accessible to all staff at the Host Institution

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<sup>6</sup> <https://www.iaa.ie/research-innovation/research-integrity/>

- ask for information about a HRB Host Institutions' processes and procedures and how these are being implemented

Should a Host Institution uphold an allegation of research misconduct against a HRB-funded researcher, the Host Institution must notify the HRB of this as per Section 3 of this policy and Clause 14 of HRB Terms and Conditions<sup>7</sup>.

The exception to this approach is where a complainant wishes to make a Protected Disclosure to the HRB under the Protected Disclosures Act 2014<sup>8</sup>. In this instance, the HRB Policy on Good Faith Reporting will apply<sup>9</sup>.

## 5. Sanctions

If a HRB Host Institution upholds a research misconduct allegation, the HRB may apply their own specific sanctions. These may be independent of those set by the HRB Host Institution. The HRB may for example:

- send a letter of reprimand to the subject of the upheld allegation (complainee)
- remove the complainee from the affected award(s)
- withdraw funding from the complainee on the affected award(s)
- bar them from being a supervisor or mentor on a HRB-funded award
- temporarily or permanently restrict them from future grant applications (or specific type of grant applications)
- allow future grant applications, but require the HRB Host Institution to monitor the way the person manages staff

The HRB may apply sanctions against a HRB Host Institution if it finds that the institution has failed to:

- respond to an allegation of research misconduct promptly and objectively
- keep the HRB informed of the outcomes of a upheld allegation

Sanctions against a HRB Host Institution may include:

- not accepting new grant applications for a limited and specified period of time
- restricting applications for specific grant types
- suspending funding to the organisation in extreme cases

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<sup>7</sup> <https://www.hrb.ie/funding/manage-a-grant/grant-terms-and-conditions/>

<sup>8</sup> <http://www.irishstatutebook.ie/eli/2014/act/14/enacted/en/html>

<sup>9</sup> HRB Policy on Good Faith Reporting – <https://www.hrb.ie>