

Policy on Handling Alleged Misconduct in Applications made to HRB



August 2023



1 Policy Statement

The HRB expects all researchers that it funds to adhere to the highest standards of integrity in the writing and submission of their funding applications. The HRB fully endorses the National Policy Statement on Ensuring Research Integrity in Ireland¹ and has clarified its policy on handling alleged misconduct by HRB-funded researchers². This policy is in line with the HRB General Terms and Conditions for Research Awards³, which apply if an application is successful, and should also be considered alongside our policies and processes related to good research practice⁴.

2 Definitions

This HRB policy primarily covers (though is not confined to):

- fabricating or falsifying data used to support a grant application
- plagiarism within a grant application.

The National Policy Statement on Ensuring Research Integrity in Ireland¹, which is based on the European Code of Conduct for Research Integrity⁵ and the OECD Best practices for ensuring scientific integrity and preventing misconduct⁶, clarifies the meanings of fabrication, falsification or plagiarism as follows:

- **Fabrication** is making up data or results and recording or reporting them.
- **Falsification** is manipulating research materials, equipment or processes, or changing or omitting data or results such that the research is not accurately represented.
- **Plagiarism** is the appropriation of another person's ideas, processes, results, or words without giving appropriate credit.

Research misconduct excludes honest error or differences of opinion about execution or interpretation when evaluating research design, methods, or results.

3 Responsibilities of the Host Institution

In line with the expectations of HRB-approved Host Institutions, HRB Terms and Conditions of funding, and guidelines developed by the National Forum for Research Integrity, it is the responsibility of the HRB Host Institution to:

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

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

² <https://www.hrb.ie/funding/funding-schemes/before-you-apply/all-grant-policies/research-misconduct/>

³ <https://www.hrb.ie/funding/manage-a-grant/grant-terms-and-conditions/>

⁴ <https://www.hrb.ie/funding/research-policies-and-practices/research-practices/good-research-practice/>

⁵ <http://www.allea.org/wp-content/uploads/2017/03/ALLEA-European-Code-of-Conduct-for-Research-Integrity-2017-1.pdf>

⁶ <http://www.oecd.org/science/inno/40188303.pdf>

- a clear point of contact for receiving allegations.

The policy 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 potential sub-awardee organisation, if relevant.
3. Respond promptly and in confidence to allegations of research misconduct in funding applications which have been submitted to HRB. Allegations should be investigated in an impartial, fair, and timely manner.
4. Alert the HRB Director of Research Strategy and Funding (misconduct@hrb.ie) and provide relevant information at key stages in the Host Institution process following the receipt of any such allegation:

Stage 1. Allegations and Initial enquiry

The information that should be provided to the HRB at this stage includes:

- the name of the person against whom the allegation has been made, and application reference number
- a brief factual statement about the nature of the allegation
- the timeline for conducting an initial enquiry of whether there is a *prima facie* case to answer
- a brief factual statement on the outcome of the initial enquiry
- the timeline for any subsequent investigation that may be deemed necessary

Stage 2. Outcome of any investigation (if relevant)

The information that should be provided to the HRB includes:

- a brief factual statement on the outcome of the investigation, including whether the allegation has been upheld, any sanctions applied, and any other information that is deemed relevant, on a case-by-case-basis.

This should only happen once the full internal investigative process is complete, including any appeal.

5. Take appropriate actions where an allegation is upheld.
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 in funding applications. 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 in a funding application is made to the HRB rather than to the relevant HRB Host Institutions the individual making the complaint (complainant) – excluding HRB reviewers/panel member or HRB staff - will be referred to the Host Institution of the named Principal Investigator.

When an allegation is made by HRB reviewers/ panel member or HRB staff during the HRB application evaluation process, the HRB will refer the allegation directly to the relevant Host Institution.

The Host Institution is then responsible for enacting its processes and procedures for handling allegations of research misconduct, and for alerting the HRB at key stages in the process as per Section 3 of this policy and Clause 14 of HRB Terms and Conditions².

Following an alert from the Host Institution that it is conducting an initial enquiry into alleged research misconduct involving an application for funding the HRB will take the following actions:

- The processing of the proposal will continue
- If the proposal is fundable, funding will be withheld until the Host Institution process is completed
- Where the Host Institution finds that there is **no case** to answer and/or the allegation is not upheld upon investigation, then the matter is deemed closed and the funding process can continue as normal
- If the allegation is upheld by the investigation of the Host Institution, the HRB will withdraw the offer of funding to the respondent (if this has already been made) for the application under dispute, explaining the basis for this decision.

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

4.1 Sanctions

If a HRB Host Institution upholds an allegation of research misconduct involving an application for funding, the HRB may apply their own specific sanctions, regardless of whether that application was deemed fundable. These may be independent of those set by the Host Institutions. The HRB may for example:

- send a letter of reprimand to the subject of the upheld allegation (complainee)
- bar him/ her from being a supervisor or mentor on an HRB-funded award
- temporarily or permanently restrict him/ her from future grant applications (or specific types of grant applications).

The HRB may apply sanctions against a Host Institution if we find that it has failed to:

- respond to an allegation of misconduct in a HRB funding application promptly and objectively
- keep the HRB informed of the key stages in the process following the receipt of an allegation, including the outcomes of an upheld allegation
- put in place preventative measures to ensure that allegations of this nature do not occur in future.

Sanctions against a HRB Host Institution may include:

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

August 2023