Charles Sturt University

Comments to the National Health and Medical Research Council (NHMRC):

Review of the Australian Code for the Responsible Conduct of Research

Contact details:

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General Comments

Charles Sturt University (CSU) appreciates the opportunity to provide input into the review of the Australian Code for the Responsible Conduct of Research *(the Code).*

CSU is supportive of the key proposed changes in this draft, and believes the supporting documentation will be extremely helpful in the understanding and dissemination of the principles-based approach in the Code.

Following are responses to the specific questions presented in the public consultation.

Q1: Do you like the new approach to the Code, namely the principles-based document being supported by several guides that provide advice on implementation?

Yes. The concise statement of guiding principles on page 2 is particularly helpful. The new code is simple to follow and less complex, while still covering appropriate levels of information.

The Responsibilities are mostly clear.

Q2: The draft Code is intended to be used by all research disciplines. Do the principles adequately capture the expectations for responsible research across all research disciplines?

Mostly yes, but in Principles of responsible research conduct P6 (page 2), the specification of Aboriginal and Torres Strait Islander peoples may need to consider that Australian researchers are sometimes doing research in other countries where appropriate recognition of indigenous/first nation peoples is also important; it seems restrictive to just refer to Aboriginal and Torres Strait Islander peoples only. This is implied in the use of "communities", but may still be restrictive in relation to international research.

Q3: The draft Guide refers to breaches of the Code rather than providing a definition of research misconduct, and states that institutions can decide whether or not to use the term research misconduct in their own processes. Is this guidance clear and implementable? What issues do you foresee with that approach?

Use of inconsistent terminology may become confusing and problematic when investigating code breaches, and it may mean ultimately institutions need to revise relevant policies to align terminology with the code. This becomes a bit confusing in section 3.2 where it is indicated that research misconduct is defined as a major breach, although it is also indicated that there is no clear definition of the latter and that there is a spectrum of breaches. It may make more sense to remove use of "research misconduct" and refer to minor/moderate/major breaches of the code only.

Q4: Do you think the process described for investigating and managing potential breaches of the Code is clearly described and practical?

Yes, the process is useful; it may need to include some level of flexibility where cases do not fully align with the process as outlined. It would be useful to link also to the roles in Table 1 to indicate who would/should be involved at each stage of the investigation/process.

Q5: The Code Review Committee and working group are considering what additional resources should be developed to support implementation of the Code and Guide. Do you think that case studies would assist you to investigate and manage potential breaches of the Code in accordance with the Guide?

Yes, case studies would be very useful, also as training/instruction materials.

Q6: Are the mechanisms for review of an investigation clearly and correctly described in Section 7.6 of the Guide? If not, where are the inaccuracies?

More work or guidance may be needed around the suggestion that institutions should have an internal appeals process on the grounds of procedural fairness. Section 7.6 is very brief in the Guide. The proposed changes to the Code may have flow on effect as to the role of ARIC (for ARC and NHMRC funded research) and the question should be asked whether or not ARIC should be mentioned in the Guide, only because the Code covers all research.

Q7: NHMRC, ARC and UA are considering the development of additional guides to support implementation of the Code. The next two guides will likely focus on authorship and data management. The possible topics for additional guidance are supervision, conflicts of interest, peer review, collaborative research, intellectual property and copyright, the role of research integrity advisors, the role of research integrity offices, strategies to encourage compliance or clinical trials. All of these are currently covered in varying amounts of detail in the current Part A of the Code and in other material. Please comment on which three topics you would nominate as being the highest priority and why.

Role of research integrity advisers: this is sometimes a role that comes with a position, with limited training. Guides as to what the role should entail would ensure this is consistent across all institutions and support those in the role.

Supervision: clear guidelines for supervisors in HDR training around research conduct, and roles, rights and responsibilities in the student-supervisor relationship for all parties would be a useful support for graduate studies management in universities.

Intellectual property: particularly for HDR students and collaborations, as with increasing collaboration, multi-site involvement and industry partnerships, this can be complex to navigate.