Research Misconduct Policy

DND*i*'s Policies

Contents

I. Objective and Scope

DND*i* best practice standards are being upheld, DND*i* hereby reaffirms its policies, to specify procedures and appropriate safeguards for handling investigations, and to foster an environment that discourages misconduct in all research. This policy applies to all partners and individuals engaged with a research project supported or sponsored by DND*i*.

II. Definitions

Research misconduct means fabrication, falsification, or plagiarism, in proposing, performing, or reviewing research, or in reporting research results.

a. Fabrication is making up data or results and recording or reporting them.

b. Falsification is manipulating research materials, equipment, or processes, or changing or omitting data or results such that the research is not accurately represented in the research record.

c. Plagiarism is the appropriation of another person's ideas, processes, results, or words without giving appropriate credit.

d. Research misconduct does not include honest error or differences of opinion.

Research misconduct also includes failure to comply with requirements for the protection of human or animal research subjects.

Requirements for findings of Research Misconduct

A finding of research misconduct requires that there be a significant departure from accepted practices of the relevant research community; and the misconduct be committed intentionally, knowingly, or recklessly; and the allegation be proven by a preponderance of the evidence.

III. Procedure

The following describes procedures to be followed once an allegation or other evidence of misconduct is received.

A. Preliminary Assessment

The Research & Development (R&D) Director (RDD) and /or the Research Integrity Officer (RIO) promptly assesses the reported incident to determine if it constitutes a bona fide allegation of research misconduct—i.e., does the alleged incident fit the definition of research misconduct and is the evidence sufficiently credible and specific so that potential evidence of research misconduct may be identified? If it is concluded that a bona fide allegation of research misconduct has been made, the misconduct procedure enters its investigation phase.

Upon receiving an allegation of research misconduct, the RDD may appoint one or more persons to conduct an inquiry to determine whether there is sufficient substance to the allegation to warrant a formal investigation. The purpose of the inquiry is not to reach a final conclusion as to whether misconduct occurred or who was responsible. This preliminary phase of information gathering and fact-finding should take no more than thirty calendar days from the receipt of the allegation unless circumstances clearly warrant a longer period. If the inquiry phase is positive and shows rational that research misconduct occurred or can be suspected with reasonable doubt, the RDD shall launch an Investigation.

B. Investigation

1. The RDD notifies the Respondent (the partner organization or individual about whom misconduct allegations have been made) that an investigation is being undertaken and of the procedure that will be followed; and, describes the nature of the misconduct allegation(s).
2. At the time of notification, and in the course of the investigation, the information related to the investigation will be kept confidential to protect its integrity.
3. Where appropriate, the respondent will be provided copies of, or reasonably supervised access to, the research records.
4. If the research at issue receives or has received funding from a United States Government Agency, and, at any point during an investigation, it is ascertained that any of the following four conditions pertain, the RDD will notify the sponsoring Federal agency (For example, the Office of Research Integrity (ORI) of the United States Public Health Service (USPHS)).
5. Health or safety of the public is at risk, including an immediate need to protect human or animal subjects.
6. USPHS resources or interests are threatened.
7. There is reasonable indication of possible violations of civil or criminal law.
8. The research community or public should be informed.

9. Matters pertaining to the investigation will be treated confidentially to the maximum extent possible consistent with fact finding and required reporting to funding agencies.

10. A final written report of the investigation shall be prepared that describes the evidence that was reviewed, summarizes any interviews that were conducted, and includes the conclusion of the investigation. This report must describe the procedures under which the investigation was conducted, how and from whom information was obtained, the findings, and the basis for the findings, and include an accurate summary of the views of any individual(s) found to have engaged in misconduct, as well as a description of any sanctions taken by DND*i*.

11. The individual(s) against whom the allegation was made shall be given a copy of the report of investigation, and shall be invited to comment in writing. When comments are provided they will be included in the record.

12. Records of the investigation, including all documentary evidence, interview notes, the investigation report, and the RDD's or RIO's written determination shall be maintained in a secure manner for at least ten years.

13. Based upon a reading of the Investigative Report and any comments thereon, the RDD will make a determination of whether or not research misconduct has been committed. Following this determination, the RDD may issue the Report to the Executive Director and to any stakeholder. The Executive Director may decide to convey the Investigative report to DND*i* Board of Directors if he judges it necessary.

IV. Roles and responsibilities

A. Delegation of authority and responsibility

The R&D Director bears the responsibility for:

- Coordination of all procedures related to allegations of research misconduct by anyone or any partner performing research involved in a DND*i* R&D project.
- Fostering a research environment that discourages misconduct in all research.
- Dissemination of policy and maintenance of records related to misconduct in research.
- Appointment of an individual or a committee to conduct inquiries and investigations into allegations of research misconduct. If specific donors having research misconduct policy are involved the R&D Director determines whether regulation, or the terms or conditions of the award: (1) require notification of the sponsor; (2) specify time limits; or (3) require other actions to assure compliance.
- Assurance of appropriate confidentiality or anonymity, fairness and objectivity of proceedings.
- Assurance of a full and complete inquiry, investigation, and resolution process. Assurance that no real or apparent conflicts of interest arise in those appointed to pursue this process

that they have the appropriate disciplinary expertise and that due regard is given to the prevailing standards of the field.

- Maintenance of confidentiality of records relating to the investigation and resolution of incidents of misconduct in research.
- If appropriate or required, the R&D Director shall notify concerned parties such as co-sponsors, partners, project's principal investigators, steering committees, concerned donors, and criminal concerned authorities of the outcome of investigations, taking care to clear the name of anyone falsely charged.
- Protecting, to the maximum extent possible, the positions and reputations of those persons who, in good faith, make allegations of research misconduct, and those against whom allegations of misconduct are not confirmed.
- Efforts to restore the reputation of persons alleged to have engaged in misconduct when allegations are not confirmed.

The R&D Director may designate a RIO for assessing allegations of research misconduct and determining when such allegations warrant inquiries and for overseeing inquiries and investigations.

B. Inquires and investigations into allegations of Misconduct in Research

Existing DND*i* policy and procedures assert the responsibility of Project Leaders and Principal Investigators in maintaining ethical standards, and direct reporting of allegations to the R&D Director.

All individuals associated with DND*i* projects should report observed or suspected research misconduct to RDD and/or the designated RIO.

An allegation should, in addition to stating the nature of the suspected misconduct, present the evidence that leads the reporting individual to believe that an incident of research misconduct has occurred.

The RDD or RIO will immediately respond, as outlined below, to each allegation or other evidence of possible misconduct.

If an individual is unsure whether a suspected incident falls within the definition of research misconduct he or she should contact the R&D Director, Dr Laurent Fraisse , lfraisse@dndi.org and ask to speak with him or to report it via DND*i*'s Integrity Line. If the circumstances described do not meet the definition or research misconduct, the RDD or the RIO will refer the individual or allegation to other DND*i* staff with responsibility for resolving the problem.

The informal discussion of possible research misconduct, as well as all subsequent stages in this procedure will be, as far as is feasible, treated as strictly confidential.