

Introduction

- This submission forms the response of [the UK Research Integrity Office](#) (UKRIO) to the consultation on the draft *European Code of Conduct for Research Integrity Revised Edition 2023* (ALLEA – All European Academies).
- UKRIO welcomes this opportunity to contribute to the development of the revised ALLEA *Code*. Research integrity is an issue of global significance and one that crosses national boundaries. As a founder member of the European Network of Research Integrity Offices (ENRIO), UKRIO sees the ALLEA *Code* as a valuable resource for all European countries involved in research, and for the research community beyond Europe. We have long championed the ALLEA *Code* in our own work and welcome its latest evolution.

Response to specific questions

1. **Are there recent developments that are not reflected adequately?**

- We feel that the revised document is very comprehensive. We feel it might be helpful to give greater reference to the research integrity implications of research involving the internet and, in particular, social media.

2. **Are the formulations clear and easy to read?**

- Yes, the document is succinct and clearly written in an accessible way.

3. **Are there any key resources that should be added/replaced/updated?**

- The ‘country reports’ of the European Network of Research Integrity Offices, which give an overview of research integrity structures, resources and sources of support for each member nation, may be of interest:
<http://www.enrio.eu/country-reports/>.

General comments

- The definition of research misconduct (2023 ALLEA *Code*, page 10) focuses significantly on what are often described as ‘the traditional forms’ of research misconduct: Fabrication, Falsification and Plagiarism. We feel that this definition should be expanded:

- It is noted that “*These three forms of violation* [Fabrication, Falsification and Plagiarism] *are considered particularly serious since they distort the research record.*” However, there are additional unacceptable practices which can distort the research record and to the same degree as Fabrication, Falsification and Plagiarism.
- In addition, some of these additional unacceptable practices – such as failure to meet legal, ethical and professional obligations – can often cause harm, directly or indirectly, to humans and others involved in the research.
- We therefore suggest that the core definition of research misconduct be expanded to include two other key topics in addition to ‘FFP’:
 - Failure to meet legal, ethical and professional obligations.
 - Misrepresentation of data, involvement and/or interests [competing interests].
- This is a similar approach to that adopted in the UK [Concordat to Support Research Integrity](#) (Universities UK *et al.*, 2019) in its definition of misconduct in research (pages 12-13). UKRIO should note a competing interest in regard to the *Concordat*, as UKRIO representatives have contributed to its development and authorship.
- The list of additional forms of misconduct (2023 ALLEA *Code*, page 11) is most helpful, though we note that some of the behaviours listed would fall under the expanded definition we suggest above. In addition, we feel these additional forms could be listed thematically and under subheadings, to make this section easier to read.
- The section on Dealing with Violations and Allegations of Misconduct (2023 ALLEA *Code*, page 12) is most helpful. However, we feel it could be revised somewhat to better reflect the dual roles of the process and outcomes of misconduct investigations, i.e. correction of the research record as well as dealing with proven misconduct.
- This section could also mention that there can often be a need for balance across sometimes conflicting requirements during or at the conclusion of investigations. For example, the confidentiality requirements of investigations and the need to

reveal a certain amount of information to relevant bodies in order to carry out a robust investigation.

About the UK Research Integrity Office

- [The UK Research Integrity Office](#) (UKRIO) is the UK's most experienced research integrity organisation. A registered charity, we were created in response to longstanding and growing concerns about the reliability of research. Since 2006, we have provided independent and expert support to help enhance good research practice, address mistakes, questionable practices and fraud, and improve the culture and systems of UK research. [UKRIO's vision](#) is that through our activities, the research community is supported to produce work of the highest integrity, quality and efficacy.
- For further information about this submission, please contact info@ukrio.org.