

# BIOSCIENCES FEDERATION

## **Integrity, Clarity & Good Management – Code of Conduct and Policy on the Governance of Good Research Conduct**

### **A response to Research Councils UK**

September 2008

#### ***Introduction***

The Biosciences Federation (BSF) is a single authority representing the UK's biological expertise, providing independent opinion to inform public policy and promoting the advancement of the biosciences. The Federation was established in 2002, and is actively working to influence policy and strategy in biology-based research – including funding and the interface with other disciplines - and in school and university teaching. It is also concerned about the translation of research into benefits for society, and about the impact of legislation and regulations on the ability of those working in teaching and research to deliver effectively. The Federation brings together the strengths of 45 member organisations (plus nine associate members), including the Institute of Biology which represents 39 additional affiliated societies (see Appendix). This represents a cumulative membership of over 65,000 individuals, covering the full spectrum of biosciences from physiology and neuroscience, biochemistry and microbiology, to ecology, taxonomy and environmental science. The Biosciences Federation is a registered charity (no. 1103894).

#### ***1. Are you broadly content with the draft Code of Conduct set out in Section 3?***

- i. The Biosciences Federation considers the draft Code of Conduct to be broadly sound, based as it is on common sense. Researchers should be contractually obliged to sign-up to the Code of Conduct and provide clear evidence of Continuing Professional Development (CPD) in this area. We are disappointed that there is no mention of CPD in the consultation document.
- ii. There remains a lack of clarity surrounding the responsibilities of individual researchers and institutions working in collaboration with the NHS and industrial organisations, particularly with regard to the preservation of data and primary materials. RCUK should work closely with the UK Panel for Research Integrity in the Health and Biomedical Sciences, and other relevant bodies to resolve this problem.

- iii. The responsibility for the preservation and accessibility of data cannot lie solely with the individual researcher or research organisation. During our evidence gathering exercise we heard of a university paying for the storage of data - occupying one third of server space! – generated from a long-since completed BBSRC funded research project. The Federation believes that it is a responsibility of the research funder to help maintain all related data at the end of the grant period. Suitable facilities must be in place for long-term knowledge transfer.
- iv. It would be helpful to include in the Code of Conduct that, where appropriate, there should be clearly documented protocols for carrying out experimental work and that written standard operating procedures for items of equipment should be in place and readily available. These basic requirements are essential for the consistent and accurate collection of data/material: sadly, we are not confident that they are in place.

***2. Are you broadly content with the proposed outline procedures for Management of Good Research Conduct, and Reporting and Investigation of Allegations of Misconduct in Section 4 and Appendix 1?***

- v. The Biosciences Federation is broadly content with the proposed outline procedures for Management of Good Research Conduct, and Reporting and Investigation of Allegations of Misconduct. There is a clear role for Human Resources in this process and adequate training must be provided to HR staff.
- vi. These procedures should be monitored and the adequacy of reporting policies should be subject to further consultation with the provision of statistical data.

***3. Are you broadly content with the suggestions about distinguishing different levels of poor research conduct as set out in the Annex to Appendix 1?***

- vii. The Biosciences Federation considers distinguishing different levels of poor research conduct to be something of a “curate’s egg”. While it is helpful as a guide for researchers it cannot be used in formal disciplinary procedures. For example repeated instances of low level misconduct should be treated as extremely serious.
- viii. During our evidence gathering exercise a journal editor informed us of a “culture of overselling” of the merits of individual research findings. It would be helpful to include this in the definition of misrepresentation. Such 'overselling' is increasingly common in the area of research proposals. The BSF suggests that Funders randomly examine an aliquot of applications for truthfulness about claims and introduces sanctions for any that are clearly exaggerated. This may help to encourage highly competitive minds to limit hyperbole.
- ix. In addition a culture has developed where it is sometimes thought acceptable to refer to a paper as “in press” or “submitted” when this is not the case. However we recognise the apparent difficulty created by journal editors only permitting ‘in press’ papers to be listed in bibliographies. It would be helpful to allow references to others that have been submitted. Nonetheless, the practice of incorrectly citing

papers is dishonest and the fact that this may be a widespread occurrence should not be allowed to indicate that it is acceptable.

***4. Do you consider that there is need for the development of a National Advisory Body as set out in Section 4?***

- x. While we appreciate the challenges posed by self-regulation, we consider it to be unnecessary to establish a National Advisory Body: we prefer to strengthen existing structures. However we do believe that there could be an increased role for the UK Research Integrity Office within the UK Panel for Research Integrity in the Health and Biomedical Sciences. In particular we are impressed by the fact that NIH requires all grant recipients to complete an annual return to the US Office of Research Integrity whether or not there has been a breach of their code of conduct. This could be a useful mind focussing exercise in the UK but we must emphasise that there has to be a clear gain from any increase in bureaucracy.
- xi. However we are concerned that some “existing structures” are very weak and believe that a focussed effort is needed in order to make these fit for purpose. For example, in the biosciences the turnover of staff in large laboratories is substantial with many students and postdoctoral researchers present for three years only. We are not confident that these “visitors” are always alerted to the ethical requirements of the team leader and the institution: a process of osmosis is not good enough.
- xii. The Biosciences Federation supports the concept that chartered status should improve the professional status of individuals – but only if it is associated with high quality CPD and the implemented penalty of loss of chartered status for improper behaviour and/or lack of involvement in CPD. In the biosciences, we are far distant from this position; nonetheless it is important that we make a start through good CPD programmes. The Learned Societies have the resource and knowledge to help achieve this objective.

***5. Do you have any other comments on the proposals in general or in detail?***

- xiii. The Biosciences Federation firmly believes that good research practice must be inculcated at undergraduate level. The US Office of Research Integrity provides an excellent booklet, ‘Introduction to the Good Conduct of Research’, for undergraduate and postgraduate teaching. Training in research ethics must be provided during the induction of PhD students and reinforced at later career stages.

***Contact***

We should be happy to provide additional information to RCUK. Any queries regarding this response should in the first instance be addressed to Dr Caroline Wallace, Policy Coordinator, Biosciences Federation, 3<sup>rd</sup> Floor, Peer House, 8-14 Verulam Street, London WC1X 8LZ email: [cwallace.bsf@physoc.org](mailto:cwallace.bsf@physoc.org).

### ***Taskforce Members***

This response was written by a BSF Task Force comprising Dr R Dyer (Biosciences Federation; Chair), Prof J Ashmore (University College London), Mr T Brigstocke (Institute of Biology), Prof J Brookfield (University of Nottingham), Prof HS Chowdrey (University of Westminster), Prof I Cuthill (University of Bristol), Prof B Furman (University of Strathclyde), Prof P Leonard (Brunel University), Dr Caroline Wallace (Biosciences Federation).

## Appendix

### Member Societies of the Biosciences Federation

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Association for the Study of Animal Behaviour	Experimental Psychology Society
Association of the British Pharmaceutical Industry	Genetics Society
AstraZeneca	Heads of University Biological Sciences
Biochemical Society	Heads of University Centres for Biomedical Science
Bioscience Network	Institute of Animal Technology
British Andrology Society	Institute of Biology
British Association for Psychopharmacology	Institute of Horticulture
British Biophysical Society	Laboratory Animal Science Association
British Ecological Society	Linnean Society
British Lichen Society	Nutrition Society
British Mycological Society	Physiological Society
British Neuroscience Association	Royal Microscopical Society
British Pharmacological Society	Royal Society of Chemistry
British Phycological Society	Society for Applied Microbiology
British Society of Animal Science	Society for Endocrinology
British Society for Developmental Biology	Society for Experimental Biology
British Society for Immunology	Society for General Microbiology
British Society for Matrix Biology	Society for Reproduction and Fertility
British Society for Medical Mycology	Syngenta
British Society for Neuroendocrinology	Universities Bioscience Managers Association
British Society for Plant Pathology	UK Environmental Mutagen Society
British Society for Proteome Research	Zoological Society of London
British Toxicology Society	

### Associate Member Societies

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Association of Medical Research Charities	Merck, Sharp & Dohme
BioIndustry Association	Pfizer
Biotechnology & Biological Sciences Research Council	Royal Society
GlaxoSmithKline	Wellcome Trust
Medical Research Council	

### Additional Societies represented by the Institute of Biology

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Anatomical Society of Great Britain & Ireland	Institute of Trichologists
Association for Radiation Research	International Association for Plant Tissue Culture & Biotechnology
Association of Applied Biologists	International Biodeterioration and Biodegradation Society
Association of Clinical Embryologists	International Biometric Society
Association of Clinical Microbiologists	International Society for Applied Ethology
Association of Veterinary Teachers and Research Workers	Marine Biological Association of the UK
British Association for Cancer Research	Primate Society of Great Britain
British Association for Lung Research	PSI - Statisticians in the Pharmaceutical Industry
British Association for Tissue Banking	Royal Entomological Society
British Crop Production Council	Royal Zoological Society of Scotland
British Inflammation Research Association	Scottish Association for Marine Science
British Marine Life Study Society	Society for Anaerobic Microbiology
British Microcirculation Society	Society for Low Temperature Biology
British Society for Ecological Medicine	Society for the Study of Human Biology
British Society for Research on Ageing	Society of Academic & Research Surgery
British Society of Soil Science	Society of Cosmetic Scientists
Fisheries Society of the British Isles	Society of Pharmaceutical Medicine
Freshwater Biological Association	Universities Federation for Animal Welfare
Galton Institute	

**Additional Societies represented by the Linnean Society**

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Botanical Society of the British Isles

Systematics Association