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Association of Australian
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CONSULTATION

**RESEARCH INTEGRITY ADVISORS - A GUIDE
SUPPORTING THE AUSTRALIAN CODE FOR THE
RESPONSIBLE CONDUCT OF RESEARCH**

9 JULY 2021

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Research Integrity Advisors - A guide supporting the Australian Code for the Responsible Conduct of Research

AAMRI welcomes the production of the draft guide and believes that it provides valuable support for research organisations and research integrity advisors (RIAs) to help both fulfil their responsibilities under the Code. Having consulted with members, the below comments are provided to help strengthen the guide further.

Structure of the draft guide

The draft guide was repetitive in places and would significantly benefit from a change in structure. At present the draft guide has been largely structured into two sections, one providing guidance to research organisations, and one providing guidance to RIAs. However, these sections largely overlap and as such the draft guide ends up repeating most of the information in two different places. Those reading the guide are likely to be engaging with the whole document and therefore would make more sense and provide greater clarity for it to be structured around each of the theme areas discussed. Then within each of these theme areas the responsibilities of research organisations and RIAs could be noted.

Table of contents

Sections 3.1 and 3.3 are missing from the table of contents.

1. Introduction

It is queried whether the Code relates to the responsible conduct of Australian research, or research in Australia, or both.

2. Role of research Integrity Advisors

Consideration should be given to whether RIAs must have research experience or not as there are other people with other relevant experience that could undertake the role of an RIA.

If RIAs must have research background it should be made clear whether RIAs need to be active researchers or whether they just need to have research experience.

While it would be beneficial to combine the RIA and institutional sections (see above), if this approach is not taken then it would make sense to incorporate section 2 into section 4.

3. Responsibilities of institutions

- It would be helpful to provide some additional summary information upfront on the role of a RIAs and where they fit into the overall process so that those new to the role or considering taking it can quickly determine what would be expected of them. It would also be beneficial to note why it is important for institutions to have RIAs – not just in terms of

fulfilling requirements in the Code but in terms of how the role can improve research integrity at an institution.

- The specific skill sets of RIAs should be mentioned here such as patience, understanding, non-judgemental, approachability and empathy.

3.1 Identify and appoint RIAs

- The requirement for a demonstrated track record of research integrity would benefit from further expansion. Persons who have at some point in their career had a research integrity transgression should not necessarily be excluded from the role of an RIA since the lessons they have learnt from the experience could bring added value to the role.

3.3 Provide training and support to RIAs

- Mandating that institutions must provide training opportunities is strongly supported and this requirement must not be watered down.

3.4 Disclose interests and manage conflicts of interest appropriately

- The examples given here should be moved into section 4.3 as noted above (merging sections 3 and 4).
- The guide should note that conflicts of interest should be continuously monitored throughout the process. As an investigation widens and further people become involved it is possible that new conflicts of interest that were not initially identified might emerge.
- It should be acknowledged that in smaller institutions where most people have a working relationship with each other that it will be more difficult to manage conflicts of interest. Guidance could be provided to help overcome this issue such as suggesting the use of external RIAs or collaborating with other institutions to provide RIA service.
- It would be helpful to provide a hyperlink to the [Guide to Disclosure of Interests and Management of Conflicts of Interest](#).

3.5 Manage confidentiality

- The guide currently suggests that RIAs can keep details of discussions confidential and do not need to act if an issue has been presented as hypothetical. However, they can also take appropriate action if they reasonably believe a breach has occurred. The word hypothetical should be removed as it could place the RIA in a situation where they are unable to act on a potentially serious issue. For example, a researcher requesting to meet an RIA to discuss a 'hypothetical' issue at their institute that could affect patient safety and then deciding not to take the matter further will leave the RIA in a difficult position. If the RIA suspects that hypothetical issue is real, the RIA may be conflicted between maintaining confidentiality (as advised by the guide) and reporting to the institution (as also advised by the guide).
- Consideration needs to be given to how the guide and the Code sit alongside Commonwealth whistleblowing legislation. There are contradictions between the legal

responsibilities of companies under the whistleblowing legislation and how this guide operates. Providing confidentiality to a whistleblower is a legal requirement, but this guide and the Code suggests that issues raised must be followed up and in doing so would reveal the identity of the complainant.

- It might be helpful to define what a Research Integrity Office (RIO) is as well as other key terms in the document such as concerned party, conflict of interest etc. These definitions could be taken from the Code and placed in the appendix of this document.

4. Responsibilities of RIAs

4.1 Provide advice on responsible research conduct.

The second sentence of section 4.1 is confusingly worded, and it is difficult to determine the point being made.

Paragraph three which begins 'RIAs should respond' is particularly difficult to read and should be broken into two sentences. The use of the word fulsome does not make much sense and should be removed.

4.2 Engage in relevant training and support

The abbreviation RIO first appears in section 3.5 but is not defined until section 4.3. It is also unclear from this section what the frequency of training should be for RIAs.

4.3 Disclose interests and manage conflicts of interest

In paragraph two, the word determined should be replaced with perceived.

4.4 Ensure that any potential breaches of the Code are reported

- In this section there are contradictions in the expectations and responsibilities of the RIA. The guide states that RIAs are to keep discussions confidential unless the concerned person explicitly provides authorisation for their concern to be referred to the RIO. However, in the next paragraph it explicitly states that the RIA must report any potential breach to the RIO whether or not the concerned person provides their authorisation. This contradiction is likely to confuse RIAs, and reduce trust in the relationship between RIAs and concerned persons.

4.5 Confidentiality Requirements

- As outlined in the comments on section 3.5 the use of the term 'hypothetical' is also problematic in this section. It introduces a grey area and makes it hard for the RIA to determine whether they have a responsibility to act, particularly in relation to patient safety, or a responsibility to keep 'hypothetical' disclosures confidential. Clear guidance on roles and responsibilities should be provided.