



Australian
Academy of Health and
Medical Sciences

Feedback on the draft guide for Research Integrity Advisors, supporting the Australian Code for the Responsible Conduct of Research

A SUBMISSION BY THE AUSTRALIAN ACADEMY OF HEALTH AND MEDICAL SCIENCES

9 JULY 2021

The Australian Academy of Health and Medical Sciences

PO BOX 6114, WOOLLOONGABBA, QLD 4102

www.aahms.org | Ph +61 7 3102 7220 | ceo@aaahms.org

ABN: 55 167 124 067

About the Academy

The Australian Academy of Health and Medical Sciences is the impartial, authoritative, cross-sector voice of health and medical science in Australia. We advance health and medical research in Australia and its translation into benefits for all, by fostering leadership within our sector, providing expert advice to decision makers, and engaging patients and the public.

We are an independent, interdisciplinary body of 425 Fellows – elected by their peers for their outstanding achievements and exceptional contributions to health and medical science in Australia. Collectively, they are a representative and independent voice, through which we engage with the community, industry and governments.

Introduction

The Australian Academy of Health and Medical Sciences ('the Academy') would like to thank the National Health and Medical Research Council for the opportunity to provide feedback on a new draft guide, *Research Integrity Advisors*, which accompanies the Australian Code for the Responsible Conduct of Research. The Academy welcomes the development of the draft guide, which provides important additional information on the roles and responsibilities of individual Research Integrity Advisors (RIAs) and their institutions.

In this submission, the Academy includes feedback on three themes from the draft guide:

1. The need for diverse representation when appointing RIAs (Section 3.1);
2. Training for RIAs (Section 3.3); and
3. A move away from obligatory reporting for RIAs (Sections 3.5 and 4.4).

Specific comments on sections of the draft guide are discussed below.

Section 3.1 Identify and appoint RIAs

This section should include a statement requiring diversity in the panel of RIAs. This will encourage reporting from a broader range of researchers and support broader efforts for workplace diversity. Diversity requirements should address gender and career stage diversity in particular.

For example, someone reporting an incident may feel more comfortable speaking to a woman RIA rather than a man, and early career researchers may be encouraged to come forward if there was the opportunity to speak to an RIA at a similar career stage.

Section 3.3 Provide training and support to RIAs

This section should include greater detail and clearly articulate the type and extent of training required for RIAs. Training for RIAs should include a formal vetting and training step such that the institute can demonstrate the capabilities of their appointed RIAs. It should also include reference to refresher training.

Section 4.4 Ensure that any potential breaches of the Code are reported

This section requires clarification and further information in a number of areas.

Firstly, additional information should be included in the first paragraph that describes the steps that the RIA must take to move reports forward in the event that documentation is not provided by a concerned party. This would provide greater clarity to support the statement that it is '*not the role of the RIAs to collect evidence*'.

Secondly, clarification is needed regarding the requirement for RIAs to report on potential breaches of the code. The draft guide states in this section that RIAs are obliged to '*report potential breaches*', however the

guide also states that RIAs are advised to '*keep discussions about research integrity confidential*'. The apparent contradiction has the potential to create confusion and conflict for individual RIAs in coming forward if the advice described in the guidance favours the system over the individual.

The requirement for RIAs to act on any deviations from the Code may lead to hesitancy on the part of researchers to initially approach RIAs for advice on integrity matters. To encourage researchers to consult with RIAs, the guide should expect that RIAs will act as knowledgeable advisors, rather than obligatory reporters.

Any clarifications or amendments that are made to Section 4.4 should also be reflected in the text of Section 3.5 Manage confidentiality in the Research Integrity Advisors guide.
