



Australian Government

National Health and Medical Research Council

## NHMRC Research Integrity Fact Sheet Two

# Concerns arising during peer review about possible research misconduct

This fact sheet provides advice to researchers or others who have become concerned during NHMRC peer review assessment that research misconduct may have occurred. It helps peer reviewers understand how to raise such concerns.

The [Australian Code for the Responsible Conduct of Research 2007](#) (the Code) aims to promote high quality conduct in research, and also sets out responsibilities for institutions and staff when research misconduct occurs. You should already be familiar with Part A of the Code, which describes the principles and practices for encouraging responsible conduct for researchers and institutions.

## Your role in peer review

Peer review is central to NHMRC's strategy of investing in high quality health and medical research, building research capacity and supporting the best research and researchers.

The Code describes peer review as the impartial and independent assessment of research by others in the same or a related field, and notes that peer review may play a role in drawing attention to deviations from the principles of the Code. Section 6.2 of the Code identifies the responsibilities of peer reviewers.

NHMRC's [Principles of Peer Review](#) and [Guide to NHMRC Peer Review](#) provide additional detail about NHMRC's expectations of peer reviewers and about the peer review process. You should be familiar with the guidance provided in both the Code and the additional NHMRC guidance regarding the role of peer reviewers.

## What should I do if I come across something that suggests research misconduct while reviewing a grant for NHMRC?

When you are undertaking peer review for NHMRC, you might have concerns, for example, about items in a publications list, or the appearance of potentially false or misleading statements, diagrams or figures. You could also have concerns about the behaviour of other peer reviewers.

### Re-familiarise yourself with the Code

The first step should be to re-read the [Code](#), to make sure that you are clear about what you believe is wrong. Definitions of research misconduct can be found at page 10.1.

Part A of the Code provides advice on how to manage research data and materials, how to publish and disseminate research findings (including proper attribution of authorship), obligations in peer review, how to collaborate across institutions and how to manage conflicts of interest.

The second step should be to read the [NHMRC Funding Rules](#) which address issues about incomplete, false or misleading applications.

## If I believe research misconduct may have occurred, how should I report my concerns?

Raise your concerns with NHMRC. The best way of doing this depends on what stage of peer review the application is in when your concerns arise:

- If Peer Review Panel meetings have not yet begun, you should contact the relevant secretariat using the funding program or panel-specific email address.
- If Peer Review Panel meetings are underway, you should raise the issue in a side discussion with the panel chair, secretariat and/or the director of the relevant funding program.

Where appropriate, the relevant NHMRC director will then refer the matter to NHMRC's Ethics and Governance section, which will consider the concerns and, where appropriate, contact the research institution involved. Note that NHMRC does not conduct its own investigation into allegations. Under the Code, this is the responsibility of the relevant institution. However, NHMRC will liaise with the institution regarding the outcome of any investigation, and take any necessary precautionary or consequential actions under the [NHMRC policy on misconduct related to NHMRC funding](#).

Make sure that you document your concerns clearly and precisely, since this will help us be specific with the relevant research institution.

## Should I raise these issues in my assessment report or in panel discussion?

As an assessor, your assessment report or contribution to panel discussions should be completed without reference to any concerns related to integrity, as these will be dealt with through a separate process while the application continues to progress through the peer review process. Assessment comments can, and should, comment on or seek clarification on any aspect of the application, but such comments and queries should not be couched in terms that question the integrity of the application or applicant. For example, as an assessor it would be appropriate to query statistics in an application that appear to be incorrect, and in schemes that allow for rebuttal, this gives the applicant an opportunity to clarify or correct the matter. However, it is not appropriate in assessment reports to suggest that an apparent error or inconsistency is suggestive of research misconduct. Such concerns should be raised separately, as indicated above.

The [NHMRC policy on misconduct related to NHMRC funding](#) ensures that mechanisms are in place to take into account any unresolved research misconduct allegations prior to funding being released (e.g. a condition could be placed on a grant preventing the commencement of funding until after the resolution of the matter, with funding potentially being withheld if research misconduct is proven).

Since allegations are investigated by institutions, NHMRC may need to provide written material on the nature of the concerns. We will not reveal your identity to the institution without your consent, and as a general rule will strive to maintain the anonymity of peer reviewers.

## What if I am still not satisfied?

If you do not believe your concerns have been adequately dealt with through this process, you can raise your concerns in the first instance with the Ethics and Governance section by emailing [integrity@nhmrc.gov.au](mailto:integrity@nhmrc.gov.au) which can provide you with further advice.