

EUA Response to the draft of the European Code of Conduct for Research Integrity

EUA welcomes the document as a sound draft, though still in need of essential amendments. The document, as stated, should function as a framework for institutional and national codes and practices, and should thus not be overly prescriptive while attributing main responsibilities to the various stakeholders.

EUA believes that the Code could be shortened somewhat, particularly Chapter 4, which is found to be overly prescriptive. In the view of EUA, there is good research conduct and misconduct, but in between is a 'grey zone' of questionable conduct, which is by definition not possible to delimit. The framework document should focus on definitions of good conduct and misconduct, underlining the necessity for proper institutional processes to ensure good conduct, deal appropriately with misconduct, and review questionable conduct in a manner that is fit for purpose.

EUA finds that the role of institutions for developing such practices in a continuous manner is not adequately emphasised in the document as it stands. It is important that the responsibilities of researchers and institutions are clear in all chapters. While supervisors play a key role in passing on good research conduct to early-stage researchers, the Code should promote a structured approach that is supported by university leadership and implemented by academic and administrative management staff.

Apart from the formal procedures, EUA finds that the document explicitly should mention the importance of a culture of research integrity supported throughout higher education, particularly the availability of training courses, a supportive work environment and conducive institutional strategies. The EUA Council for Doctoral Education's document ***Taking Salzburg Forward*** makes specific references to this aspects as a result of a thorough consultation with the members.

EUA finds that the separation of research integrity from research ethics makes the Code stronger. For the sake of clarity, chapter 3.4 could be omitted as the separation of integrity and ethics is mentioned explicitly in the introduction.

EUA congratulates ALLEA on the draft and the work done. However, the Association has serious doubts about the validation process. The interplay between individuals, institutions, and other stakeholders in the issue of integrity is very delicate, and EUA strongly believes that the Code would need to be validated by multiple organisations in order to attain a firm legitimacy within the research community. EUA calls on the European Commission to ensure this validation by the ERA Stakeholder Platform, which is the appropriate body for a broad validation.

