



Australian Government

National Health and Medical Research Council

## NHMRC Research Integrity Fact Sheet One

### What should I do if I suspect a researcher may be doing the wrong thing?

NHMRC supports health and medical research, provides evidence-based health advice and establishes the ethical framework for research in Australia. NHMRC does not regulate research standards in Australia or investigate complaints about possible research misconduct. Institutions are responsible for investigating such complaints. This fact sheet provides information about how to raise concerns about research integrity. It also provides information about raising concerns related to possible fraud or other misconduct by researchers.

If you are a researcher, you should particularly note the section: 'Raising concerns about other researchers'.

If you are an NHMRC peer reviewer, you should refer to NHMRC Research Integrity Fact Sheet Two: [Concerns about research integrity arising during NHMRC peer review](#).

### Concerns about research integrity

- A concern about research integrity can arise where there is a reasonable suspicion that one or more researcher/s have not conducted research in accordance with the [Australian Code for the Responsible Conduct of Research, 2018](#) (the Code).
- Anyone can raise concerns about potential breaches of the Code or make an allegation of other misconduct (including fraud), including researchers, students, members of the public, peer reviewers and those involved in research projects as participants.
- Concerns about research integrity can be raised with a range of entities, including NHMRC, institutions and publishers.
- The Code requires research institutions in Australia to have mechanisms in place to receive concerns or complaints about potential breaches of the Code and to have processes in place for managing and investigating these concerns that are 'timely, effective and in accord with procedural fairness' (the Code, p. 3).
- If you are concerned that there has been a breach of the Code, you should raise your concerns directly with the institution that has responsibility for the research project in accordance with the institution's processes for lodging a complaint. If you are a student or employee of the institution, you may first wish to approach your institution's Research Integrity Advisors. If you are an NHMRC peer reviewer, refer to [Fact Sheet Two](#) for advice about how to raise your concerns with NHMRC.
- NHMRC cannot investigate potential breaches of the Code.
- Under the Code, institutions have a responsibility to support the welfare of all parties involved in an investigation of a potential breach of the Code (the Code, p.3).

- Where allegations relate to research or researchers funded by NHMRC or administered by NHMRC on behalf of the Medical Research Future Fund (MRFF), institutions must notify NHMRC of matters where an investigation is being conducted. NHMRC will monitor the progress of the investigation, and liaise with the institution. This process is explained in the [NHMRC Research Integrity and Misconduct Policy](#).

## Raising concerns about other researchers

- If you are a researcher or research student and have concerns about other researchers, either at your institution or at another institution, as a first step you should re-read the Code, to make sure that you are clear about what you believe is wrong. You may also find the [Guide to Managing and Investigating Potential Breaches of the Australian Code for the Responsible Conduct of Research, 2018](#) (the Investigation Guide) helpful.
- Secondly, you should review the institutional policy for managing complaints about potential breaches of the Code, as this will provide details about how concerns are managed. If your concerns relate to a researcher at another institution, you should still review your own institution's policy, as it will include details of staff members who will be able to offer you confidential advice about your concerns.
- You should be able to find information about how to lodge a complaint or raise a concern about research integrity on an institution's website.
- Institutional policies should provide additional details about the conduct of investigations.

## Research integrity concerns raised with NHMRC

- Sometimes you may not want to raise concerns about research integrity directly with the relevant institution.
- In these circumstances, you can email NHMRC at [integrity@nhmrc.gov.au](mailto:integrity@nhmrc.gov.au) for advice. Where your concerns remain, and if the matter relates to NHMRC-funded or MRFF-funded research or an NHMRC-funded or MRFF-funded researcher, NHMRC may refer the concerns or allegations to the relevant institution, including your details, unless you ask us not to provide your details.
- NHMRC's strong preference is for complainants to identify themselves when raising concerns about research integrity. This facilitates communication between you and the institution and facilitates procedural fairness for all parties.
- However, as legal protections for whistleblowers vary between Australian states and territories, NHMRC will accept anonymous complaints or de-identify complaints (at your request) if you are concerned that the relevant institution/s is not able to provide appropriate protection.
- In referring a matter to an institution, NHMRC will not provide further information to you about the matter. This applies to both identified and anonymous complainants. However, we will let you know whether or not the matter has been referred.
- If NHMRC receives an anonymous complaint and the complainant cannot be contacted, NHMRC may forward the complaint in full or in part to the relevant institution for assessment and investigation.
- Concerns (whether from a named, anonymous or de-identified complainant) may not be referred where it is clear that the allegations have been raised with both NHMRC and the institution or where an allegation lacks the minimum information necessary for a referral (e.g. a specific research activity, researcher or institution is not identified).
- Once a matter has been referred to an institution, either by you or NHMRC, it is the responsibility of the institution to manage the complaint and provide NHMRC with notifications in accordance with the [NHMRC Research Integrity and Misconduct Policy](#).

## Allegations of fraud

If you wish to make an allegation of fraud related to NHMRC funding, you can do so by emailing the details to [integrity@nhmrc.gov.au](mailto:integrity@nhmrc.gov.au).

Allegations of fraud relating to NHMRC funding will be provided to the NHMRC's Fraud Control Officer, who will make a preliminary assessment to determine whether the reported behaviour is potentially fraudulent in nature and whether further action is warranted. Further information on NHMRC's management of allegations of fraud is provided in NHMRC's [Fraud Control Framework](#).

Allegations of fraud may overlap with complaints or allegations that a researcher may have breached the Code (for example, where it is alleged that falsified data were used in a grant application). If this is the case, the allegations may trigger an institutional investigation of a potential breach of the Code, and may also be considered by the Fraud Control Officer under the provisions of the [Fraud Control Framework](#).

## Allegations of other forms of misconduct

If you wish to make an allegation about any other form of misconduct by a person who is receiving or applying for NHMRC or MRFF funding, you should contact the relevant institution in the first instance. Other forms of misconduct could include, for example, criminal behaviour that does not relate to research misconduct.

If you do not want to raise your concerns with the relevant institution, you can email NHMRC at [integrity@nhmrc.gov.au](mailto:integrity@nhmrc.gov.au) for advice.

## What if I am not satisfied with the way my allegations were investigated?

If you are not satisfied with the way an investigation into a potential breach of the Code has been conducted by an institution, and if the research was conducted by an institution that receives funding from NHMRC or the Australian Research Council (ARC), you may ask the Australian Research Integrity Committee (ARIC) to review the processes undertaken by the institution. Details about how to lodge a request for review with ARIC are provided on the [NHMRC website](#).

If the research institution is not funded by NHMRC or ARC, or if your allegations were about fraud or other forms of misconduct, you may be able to request that the Ombudsman at the state, territory or Commonwealth level undertakes an investigation. There may also be avenues under whistleblower or other legislation. You will need to seek your own legal advice about this.