Evaluation of the Australian Research Integrity Committee

Final Evaluation Report

National Health and Medical Research Council

August 2023

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Glossary

Term	Definition
Australian Research Integrity Committee (ARIC).	Jointly established by the ARC and NHMRC, ARIC undertakes reviews of the processes followed by research institutions when handling and investigating potential breaches of the *Australian Code for the Responsible Conduct of Research, 2018 (the Code).* ARIC reviews apply to institutions that are in receipt of ARC or NHMRC funding.
Australian Research Council (ARC).	A Commonwealth entity within the Australian Government that is the primary research funding agency for non-health and medical research.
National Health and Medical Research Council (NHMRC).	A Commonwealth entity within the Australian Government that is the primary research funding agency for health and medical research.
The Australia Code for the Responsible Conduct of Research, 2018 (the Code).	Provides a framework for the responsible conduct of research in Australia.
The Guide to Managing and Investigating Potential Breaches of the Australian Code for the Responsible Conduct of Research, 2018 (the Investigation Guide).	The Guide assists institutions to manage, investigate and resolve complaints about breaches of the Code by providing a model that all institutions, regardless of size, type, or field, can follow.
Stakeholders.	Stakeholders within Australia's research integrity arrangements include research institutions, researchers, Government and ARIC applicants.
Research institutions.	Universities, independent research institutes, hospitals or other organisations that conduct research. It may refer to one or multiple institutions.
The ARIC Framework (the Framework).	Provides ARIC's terms of reference and other relevant information such as the scope of an ARIC review and Committee procedures.
Secretariat.	The ARIC Secretariat is comprised of staff members from both the NHMRC and ARC, who are responsible for NHMRC-ARIC and ARC-ARIC, respectively. The Secretariat supports ARIC through the review processes.

Executive Summary

Background

Australia has a self-regulation approach to maintaining and governing research integrity

The Australian Code for the Responsible Conduct of Research[1] (the Code) establishes a national framework for responsible research conduct. Institutions and individual researchers are responsible for upholding the principles set out in the Code. The Code sets out eight principles for responsible research conduct which include honesty, rigour, transparency, fairness, respect, recognition, accountability, and promotion. Institutions and researchers are expected to comply with the principles and responsibilities outlined in the Code. Institutions that undertake research are responsible for investigating complaints and allegations relating to this research and they are expected to do so in line with the requirements of the Code and the Guide to Managing and Investigating Potential Breaches of the Australian Code for the Responsible Conduct of Research, 2018 (the Investigation Guide). The model for managing research integrity in Australia is one of self-regulation using a national framework.

The Code sets out the core behaviours that characterise the responsible conduct of research.[2] A failure to meet the principles and responsibilities set out in the Code is defined as a breach and, depending on the severity of the breach, may be referred to as research misconduct. Compliance with the Code is a requirement for the receipt of National Health and Medical Research Council (NHMRC) or Australian Research Council (ARC) funding.

Responsibility for ensuring the integrity of research lies with individual researchers and institutions. Research institutions are required to develop and implement their own governance frameworks and procedures to investigate allegations of research misconduct. As described in the Code, research institutions are best placed to understand and manage the risks associated with their research and are equipped to take appropriate action to address any issues that arise.[3]

Table 1. Principles of the Code (Source: The Code).

The Code articulates the principles of responsible research conduct. That is:
P1 Honesty in the development, undertaking and reporting of research.
P2 Rigour in the development, undertaking and reporting of research.
P3 Transparency in declaring interests and reporting research methodology, data and findings.
P4 Fairness in the treatment of others.
P5 Respect for research participants, the wider community, animals and the environment.
P6 Recognition of the right of Aboriginal and Torres Strait Islander peoples to be engaged in research that affects or is of particular significance to them.
P7 Accountability for the development, undertaking and reporting of research.
P8 Promotion of responsible research practices.

The Australian Research Integrity Committee (ARIC) is one element of the system of research integrity, which is illustrated below in Figure 1.

[1] NHMRC, ARC & Universities Australia, "Australian Code for the Responsible Conduct of Research", 2018
[2] NHMRC, ARC & Universities Australia, "Australian Code for the Responsible Conduct of Research", 2018
[3] NHMRC, ARC & Universities Australia, "Australian Code for the Responsible Conduct of Research", 2018

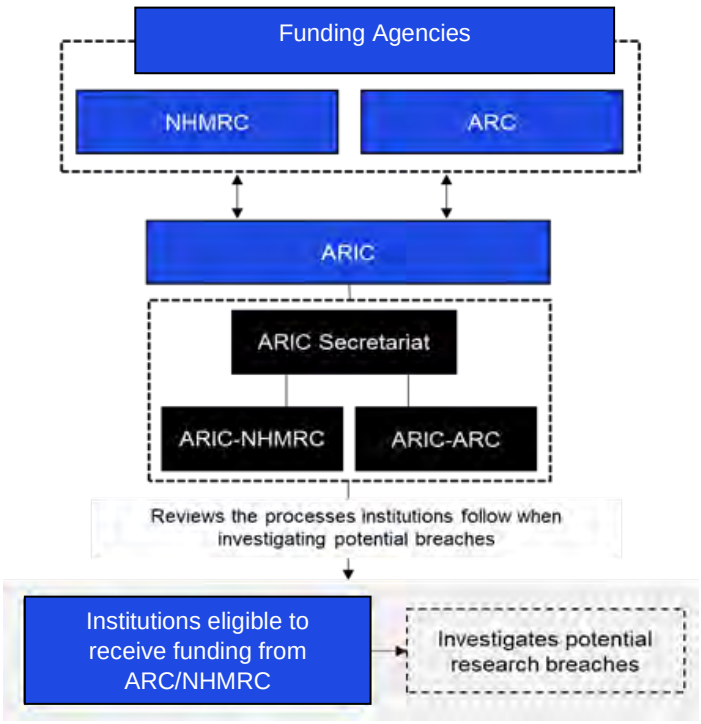


Figure 1. Structure of Australia's research integrity arrangements (Source: KPMG).

The Australian Research Integrity Committee

ARIC was established by the Australian Government in 2011 to review, on application, the processes used by research institutions to manage and investigate potential breaches of the Code. ARIC provides an independent review of the mechanism of institutions' handling and investigation of potential breaches of the Code and provides advice and reports to the CEOs of the relevant funding agency (either NHMRC or ARC). In deciding how to proceed with ARIC's findings, the relevant CEO may take into account advice from ARIC as well as other relevant factors. For example, the CEO may consider information provided by the relevant parties in response to correspondence from ARIC and any other matters which are relevant to the respective funding agency.

ARIC uses the Investigation Guide as a benchmark for reviewing how an institution in receipt of funding from NHMRC or ARC has managed a potential breach of the Code.

ARIC reviews whether an institution's investigation into a potential breach of the Code was consistent with the Investigation Guide and relevant institutional policies. At the conclusion of a review, ARIC provides a report of its review, which usually includes recommendations, to the relevant funding agency's CEO. Based on ARIC's advice and any other relevant considerations, the CEO responds to the relevant parties, providing recommendations for action where appropriate. ARIC operates as:

- NHMRC-ARIC, established under s39 of the *National Health and Medical Research Council Act 1992.*
- ARC-ARIC, established under the executive powers of the CEO of the ARC.

The ARIC Framework (the Framework) provides ARIC's terms of reference and other relevant information, such as the scope of an ARIC review and Committee procedures. The Framework was revised in 2019 to align with the revised 2018 Code.

Evaluation approach

Purpose of this evaluation

This evaluation assessed the effectiveness of ARIC in meeting its purpose as outlined in the Framework and made recommendations about membership, the Framework, and the management of ARIC, including current arrangements for Secretariat support, that could improve its effectiveness.

The evaluation drew on three main workstreams: a desk-top review of ARIC review documentation, semi-structured interviews, and a survey. These workstreams were utilised to collect qualitative and quantitative data, which were analysed to produce the final evaluation report.

KPMG undertook a desk-top review of documentation, such as final reports and minutes of ARIC meetings, from a select number of historical ARIC review cases. These historical reviews covered a range of research institutions, matters, levels of complexity and how and or whether the institution implemented the recommendations.

KPMG consulted with stakeholders using both interviews and a survey. Stakeholders included research institutions (particularly those with experience of ARIC reviews), applicants involved in an ARIC review, current and former ARIC members, academics, peak bodies, and Government agencies. These views have informed the discussion and findings in this report.

It should be noted there was a low response rate to the survey. Interviews were also conducted with representatives of all institutions that have had recent interactions with ARIC, as well as a significant proportion of applicants who have recently been involved in an ARIC review. The detailed evaluation approach is described in Appendix A.

Key evaluation questions

To guide the data collection activities, this evaluation considered two overarching key evaluation questions and five sub-questions. These are listed in Table 2 below.

Table 2. Key evaluation questions and sub-questions. (Source: KPMG).

Key evaluation questions	Sub-question
1 To what extent is ARIC effective in meeting its purpose under the Framework?	**1.1 How effective is ARIC in conducting and managing requests for reviews?**
	1.2 How effective are the outputs of ARIC reviews in informing decisions by NHMRC and ARC CEOs on how research institutions have managed potential breaches of the Code?
	1.3 To what extent are ARIC's recommendations appropriate and relevant to the NHMRC and ARC CEOs, research institutions and other stakeholders?
	1.4 To what extent is ARIC's existence and role known and understood by relevant stakeholders?
2 To what extent is ARIC's contribution to Australia's broader research integrity system fit-for-purpose?	**2.1 What (if any) are the opportunities to improve or change the function of ARIC?**

A mixed methods methodology was taken (see Figure *2* below), which included a desktop review of ARIC documentation, sourced from ARC and NHMRC and comprehensive stakeholder consultation.

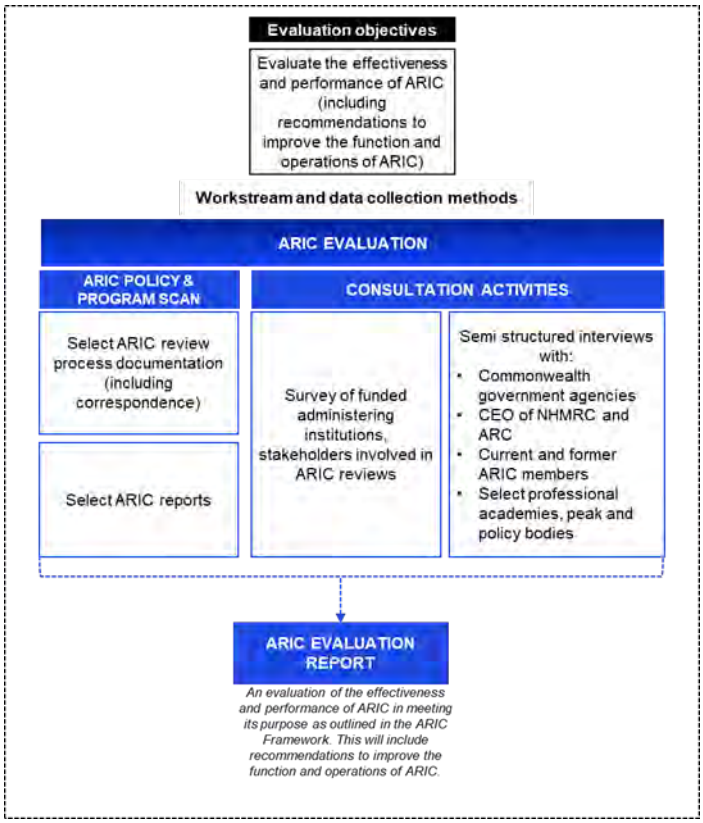


Figure 2. ARIC evaluation methodology (Source: KPMG)

Evaluation findings

Key findings against each key evaluation question are described below and expanded on throughout this report.

KEQ1. To what extent is ARIC effective in meeting its purpose under the Framework?

ARIC's role is clearly defined in the Framework, which involves reviewing institutional processes for managing and investigating potential breaches of the Code. By ensuring proper processes are observed during investigations, ARIC aims to contribute to public confidence in the integrity of Australia's research endeavours.

Feedback received during the evaluation indicates that the research sector recognises the role played by ARIC in maintaining confidence in publicly funded research and the overall research integrity system in Australia. ARIC operates effectively within the defined scope, despite the presence of complex issues and fundamental differences of perspective that often arise during any given review process.

While no substantial evidence was found to support making significant changes to ARIC's scope or function, opportunities exist to enhance ARIC's operations within its existing jurisdiction to better meet stakeholders' needs. Some of these improvements can be achieved within the current Framework, while others would require amendments to the Framework itself.

Research institutions expressed concerns about the clarity of ARIC's scope, criteria, and grounds for review, suggesting there is at least room for improvement in publicly available information about ARIC. It is recommended that a review of ARIC's publicly available information be conducted to ensure the information provided is as clear and accessible as possible.

How effective is ARIC in conducting and managing requests for reviews?

The way in which ARIC receives requests for review, including decisions about which matters are within scope

ARIC's processes for conducting reviews align with the requirements outlined in the Framework and Secretariat Operating Procedures (Operating Procedures). However, there is room for improvement to address stakeholder concerns. ARIC was found to be effective in managing requests for review, including demonstrating flexibility in accepting requests that are received outside the deadline described in the Framework. Stakeholder consultation and survey respondents raised issues regarding the distinction between procedural and merits reviews, indicating a need for clearer guidance to assist applicants in understanding the scope of review.

One challenge identified is the volume of information that ARIC is required to assess during reviews. Both institutions and applicants expressed frustration with the amount of information requested, particularly within tight timeframes. ARIC members also expressed concern about the workload associated with reviewing large volumes of material. ARIC may consider providing a better rationale for information requests and explaining the relevance to the review process. This will facilitate greater clarity for stakeholders in ARIC's information collection and synthesis processes and the scope of an ARIC review.

Several opportunities for improvement have been identified throughout the ARIC review process, including clearer communication and more transparent processes for managing conflicts of interest, convening a review panel, and requesting information. Improvements in these areas could enhance the effectiveness of ARIC in conducting and managing requests for reviews and, in turn, increase the trust and credibility of the research integrity review process in Australia.

Recommendation/s

1 Secretariat to provide more information, including examples and case studies, to assist applicants to understand ARIC's scope and the review process.

2 Reduce administrative burden on both applicants and research institutions by more fully articulating the information that is required and why. This approach would streamline the information required both by applicants and respondents.

3 ARC and NHMRC should review processes for conducting reviews and for better communication with parties throughout the review.

ARIC membership, member qualification and selection process

The current composition of ARIC demonstrates a diverse range of skills and qualifications. When considering replacements or expansions in membership, it is recommended that individuals possess experience and knowledge in research integrity management and administrative law, which would reinforce the effectiveness of ARIC.

While some stakeholders have expressed a desire for ARIC members to come from more diverse research backgrounds this is not necessarily essential given ARIC's role. The role of ARIC is to review processes related to research integrity management. It does not undertake merits review. However, there may be value in including members at different stages of their careers to provide broader perspectives and insights on ARIC cases.

Considering the workload associated with the extensive documentation that ARIC members must handle, the addition of more members would be beneficial in distributing the workload more evenly and effectively.

Recruitment of suitable ARIC members poses challenges due to the remuneration offered and the need to identify qualified individuals with minimal conflicts of interest. To address these challenges, it

is recommended the ARC and NHMRC adopt a proactive and structured approach to member recruitment.

Recommendation/s

4 Consider increasing ARIC's membership commensurate with its workload.

5 In replacing or expanding ARIC membership, the following criteria be considered when recruiting:

   a. Knowledge of research integrity management

   b. Law (especially administrative law)

   c. Career stage.

6 ARC and NHMRC develop a structured approach to member recruitment in consultation with relevant experts and stakeholder groups, with a particular focus on methods to identify potential members.

7 Consider developing publicly available membership categories for ARIC, detailing the range of skills and expertise.

The role of the Secretariat

Stakeholders acknowledged the integrity, competence and professionalism demonstrated by the Secretariat staff. While the Secretariat effectively fulfills its responsibilities as set out in the Framework and Operating Procedures, duplication of responsibilities and functions between the NHMRC and ARC Secretariat exist. Enhanced collaboration or integration between the Secretariats could lead to improved learning opportunities, workload distribution and consistency of processes.

Stakeholder interviews have highlighted that the Secretariat's ability to drive the review process and ensure timeliness is significantly hindered by limited resources. Therefore, it is recommended that the Secretariat's resources be increased to, improve process timeliness, and facilitate effective communication with applicants and institutions.

Recommendation/s

8 ARC and NHMRC consider increasing the resources available to the Secretariat(s).

9 The Secretariat(s) continue to find ways to streamline and harmonise processes across the two agencies.

To what extent are ARIC's recommendations appropriate and relevant to the NHMRC and ARC CEOs, research institutions and other stakeholders?

There are diverse perspectives within the research sector and among ARIC applicants regarding the suitability of review outcomes and recommendations. Most stakeholders reflected that there is a coherent and consistent approach in the development of ARIC reports, with no notable inconsistencies found in essential review documents. These reports provide contextual background, address procedural concerns, and establish findings directly aligned with the review's scope. References to the Investigation Guide are limited in the recommendations. Enhancing the recommendations' relevance and implementation value for institutions could be achieved by explicitly illustrating their alignment with the Investigation Guide and the Code.

The evaluation found that ARIC does not always give (or demonstrate that it has given) consideration to the proportionality of its recommendations. Stakeholders, particularly Institutions, suggested there is a need to balance adherence to the Code with competing priorities, such as institutional costs, as well as the magnitude of breaches or deviations from established processes.

In most cases, CEOs of funding agencies accept ARIC's recommendations without alteration. This is indicative of the trust placed in the quality of review findings, outcomes, and recommendations. Funding agency CEOs predominantly base their decisions on the outputs of ARIC reviews..

In contrast, research institutions exhibit varied responses to the question as to whether they considered ARIC's recommendations to be appropriate and relevant. Some acknowledged ARIC's procedural limitations and accepted the necessity of the recommendations, while others express resistance towards the review process and its outcomes. In some cases, institutions felt that ARIC's lengthy review process affected the relevance of the recommendations. Some institutions also claimed that the implementation of ARIC's recommendations can be time-consuming, expensive, and unfeasible with their limited resources, particularly when calling for Preliminary Assessments or Investigations to be repeated.

Some applicants also expressed reservations regarding the appropriateness and relevance of ARIC's recommendations and criticised the efficacy of the outcomes. While recognising the funding agencies' limited enforcement mechanisms, stakeholders contend that greater monitoring of the implementation of recommendations is desirable. Allocating additional/sufficient resources would enable the Secretariat to engage in more systematic monitoring and follow-up procedures.

Some stakeholders also expressed a need for access to information on review outcomes and lessons learned, which may not currently be readily discernible. Although ARIC provides such information in its annual reports, stakeholders seek improved accessibility and transparency.

Recommendation/s

10 Improve the alignment of recommendations with the Investigation Guide and the Code. This could be achieved by articulating how recommendations contribute to closer adherence with the Investigation Guide and subsequently the Code. This alignment would increase recommendations' relevance and implementation value for institutions.

11 Consider the proportionality of recommendations as required by the Framework. ARIC Reports should make assessments to balance the importance of ensuring adherence to the Code with countervailing priorities, such as the costs for institutions and the scale of institutional breaches or deviations from defined processes.

12 Improve timeframes for reviews to avoid recommendations becoming redundant or difficult to implement due to the passage of time.

13 Secretariats should undertake more systematic monitoring of institutions' implementation of recommendations to understand why institutions are not, or are slow in, implementing ARIC recommendations.

14 ARC and NHMRC should make information about review outcomes and lessons learned (in ARIC Annual Reports) more obvious on respective agency websites and use the information in communication and outreach activities with institutions and other stakeholders.

To what extent is ARIC's existence and role known and understood by relevant stakeholders?

Research institutions, ARIC applicants, and peak bodies possessed limited knowledge of ARIC's existence and its role, particularly when they had not previously been involved in an ARIC review. Some applicants expressed difficulties in obtaining information about the option to request an ARIC review. These themes highlight the need for proactive outreach efforts by the ARC, the NHMRC, and ARIC itself to enhance awareness of ARIC's presence. Individuals considering engagement with ARIC, as well as those involved in a review, should have accessible and comprehensive information concerning ARIC's role and scope.

To address these gaps in understanding, it is recommended that ARC, NHMRC, and ARIC increase their outreach activities to raise awareness of ARIC's existence and purpose. This could include the development of a targeted communication strategy. By implementing this recommendation, stakeholders will have a better understanding of ARIC's role.

By improving knowledge and understanding of ARIC's existence and role among stakeholders, ARIC would be better able to foster a greater level of trust and confidence in the research community, promoting the use of ARIC as a valuable resource in ensuring research integrity processes are consistently upheld and adhered to.

Recommendation

15 NHMRC and ARC, in consultation with ARIC, develop and implement a communications strategy to improve the sector's knowledge of ARIC and to encourage institutions to ensure they make information about ARIC available to all those involved in research integrity processes.

KEQ2. To what extent is ARIC's contribution to Australia's broader research integrity system fit-for-purpose?

ARIC is fulfilling the requirements of the Framework, albeit with some room for improvement in specific areas. Stakeholder feedback has raised some fundamental concerns about ARIC's role in the research integrity system which impact on its performance, particularly as these concerns could undermine confidence in ARIC and its value.

Distinguishing between process and merits

An important concept raised during the evaluation relates to the distinction between process and merits review within the context of ARIC's limited scope in conducting process reviews. Multiple stakeholders expressed concerns regarding their ability to comprehend ARIC's role, leading to misaligned expectations. In some circumstances, there was a lack of understanding of ARIC's role, which meant that expectations were not going to be met. In others, there were claims that it was hard to disentangle process issues from merits issues, resulting in requests for more information with the increased burden that causes.

It was suggested by some stakeholders that ARIC should have the authority to address the merits of a case to facilitate potential resolutions. However, such a proposition would necessitate significant operational and structural modifications within ARIC, including a reassessment of its scope and resource allocation for both the Committee and the Secretariat and was outside the scope of consideration for this evaluation. Furthermore, such a change would deviate from the current research integrity arrangements in Australia, where institutions bear primary responsibility for managing and investigating research integrity matters. Modifications to ARIC's mandate would require thorough assessment to ensure alignment with the existing Framework and to mitigate potential implications on the overall research integrity system.

To enhance clarity and avoid confusion between process and merits reviews, ARIC should be clear to stakeholders about its scope and limitations. By establishing well-defined boundaries and outlining the specific objectives of process reviews, ARIC can mitigate the challenges associated with distinguishing between process and merits issues, thereby facilitating more effective and efficient review processes. (See Recommendations 1, 14 and 15 above).

The outcomes of ARIC reviews

Concerns have been raised by stakeholders, particularly applicants, regarding the outcomes of ARIC reviews. Dissatisfaction arises from the concept that the best possible outcome an applicant can expect from an ARIC review is for a preliminary assessment or Investigation to be repeated, thereby

lengthening an already protracted process. Applicants expressed reservations about the prospect of repeating these processes, as it may result in further delays and distance from the original concerns, potentially diminishing their satisfaction with the resolution.

Institutions also questioned the rationale behind repeating Preliminary Assessments or Investigations, especially when the benefits or altered outcomes resulting from such repetition are not readily apparent. This scepticism underscores the need for ARIC to provide greater clarity and transparency in its review outcomes, ensuring that they are proportionate and meaningful and bring tangible value to both the institution and the applicant (see Recommendations 10 and 11).

Changing the outcomes from ARIC reviews would require a major change in ARIC's purpose, which is not contemplated in this evaluation. However, implementing the recommendations above should improve stakeholders understanding of ARIC's purpose and operation, so that expectations can be better managed, and processes and timeframes improved. This should help make the outcomes more relevant and useful and help increase confidence in ARIC.

Conclusion

ARIC operates effectively within its established bounds and plays a significant role in Australia's research integrity landscape. The evaluation has identified several recommendations (Recommendations 1-15 listed above) to enhance ARIC's function and operation within the current Framework. However, addressing the broader issues raised in response to Key Evaluation Question 2 would require substantial re-evaluation of ARIC's mandated role and operational framework within Australia's research integrity system.

The effectiveness of ARIC and its positive contribution to Australia's research integrity landscape can be enhanced further by the implementation of the above recommendations and commitment to ongoing improvement.

To ensure continuous improvement, there is value in conducting another evaluation in the future, approximately three-to-five years from the current assessment, should the recommended improvements be implemented. This evaluation will provide the benchmark for future evaluations assessing ARIC's performance.

1 Introduction

Australia relies on a model of self-regulation of research integrity within a framework established by national guidelines. ARIC is one element of the system of research integrity, which is illustrated below in Figure 3.

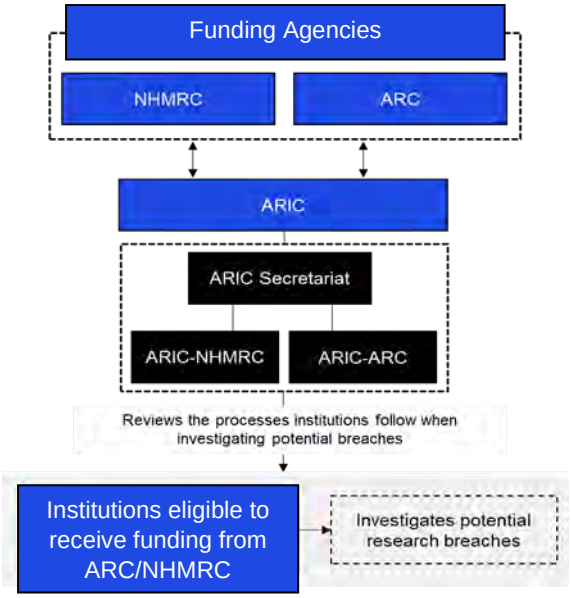


Figure 3. Structure of Australia's research integrity arrangements (Source: KPMG).

1.1 The Australian Code for the Responsible Conduct of Research

The Code articulates the broad principles for an honest, ethical, and conscientious research culture. The principles are listed in Table 3. It establishes a framework for responsible research conduct that provides a foundation for high-quality research, credibility, and community trust in the research endeavour.[4]

Table 3. Principles of the Code (Source: The Code)

The Code articulates the principles of responsible research conduct. That is:
P1 Honesty in the development, undertaking and reporting of research.
P2 Rigour in the development, undertaking and reporting of research.
P3 Transparency in declaring interests and reporting research methodology, data and findings.
P4 Fairness in the treatment of others.
P5 Respect for research participants, the wider community, animals and the environment.
P6 Recognition of the right of Aboriginal and Torres Strait Islander peoples to be engaged in research that affects or is of particular significance to them.
P7 Accountability for the development, undertaking and reporting of research.
P8 Promotion of responsible research practices.

[4] NHMRC, ARC & Universities Australia, "Australian Code for the Responsible Conduct of Research", 2018

As described in the Code:[5]

> *"The primary responsibility for ensuring the integrity of research lies with individual researchers and institutions. The Code sets out principles and responsibilities that both researchers and institutions are expected to follow, when conducting research."*
>
> *"The Code will be supported by a number of Guides that detail how to comply with the principles and responsibilities of the Code…For institutions, the Guides provide a reference for the development of processes that promote the principles and responsibilities of the Code."*
>
> *"The Code represents the core behaviours that characterise the responsible conduct of research. A failure to meet the principles and responsibilities set out in the Code is a breach of the Code…A serious breach of the Code that is carried out with intent or recklessness or negligence is particularly egregious and may be referred to as research misconduct."*

1.1.1 Responsibilities of funding agencies

The funding agencies require, through their respective funding agreements, that research institutions abide by the Code. The funding agencies establish and administer ARIC and provide Secretariat support for the Committee.[6]

ARIC provides advice and reports to the CEOs of the relevant funding agency (either NHMRC or ARC), who then may consider advice from ARIC as well as other relevant factors.

1.1.2 Responsibilities of research institutions

The Code stipulates that institutions are responsible for implementing processes that manage and investigate concerns or complaints about potential breaches of the Code.

As described in the Code, research institutions are required to develop and implement their own governance frameworks and procedures, to investigate a potential breach or instance of research misconduct. Research institutions are best placed to understand and manage the risks associated with their research and are equipped to take appropriate action to address any issues that arise.[7]

1.2 The Australian Research Integrity Committee

The ARIC was established by the NHMRC and ARC in 2011 to undertake reviews of the processes research institutions follow when handling and investigating potential breaches of the Code. As described in the Framework,[8] ARIC operates as:

- NHMRC-ARIC, established under s39 of the National Health and Medical Research Council Act 1992.
- ARC-ARIC, established under the executive powers of the CEO of the ARC.

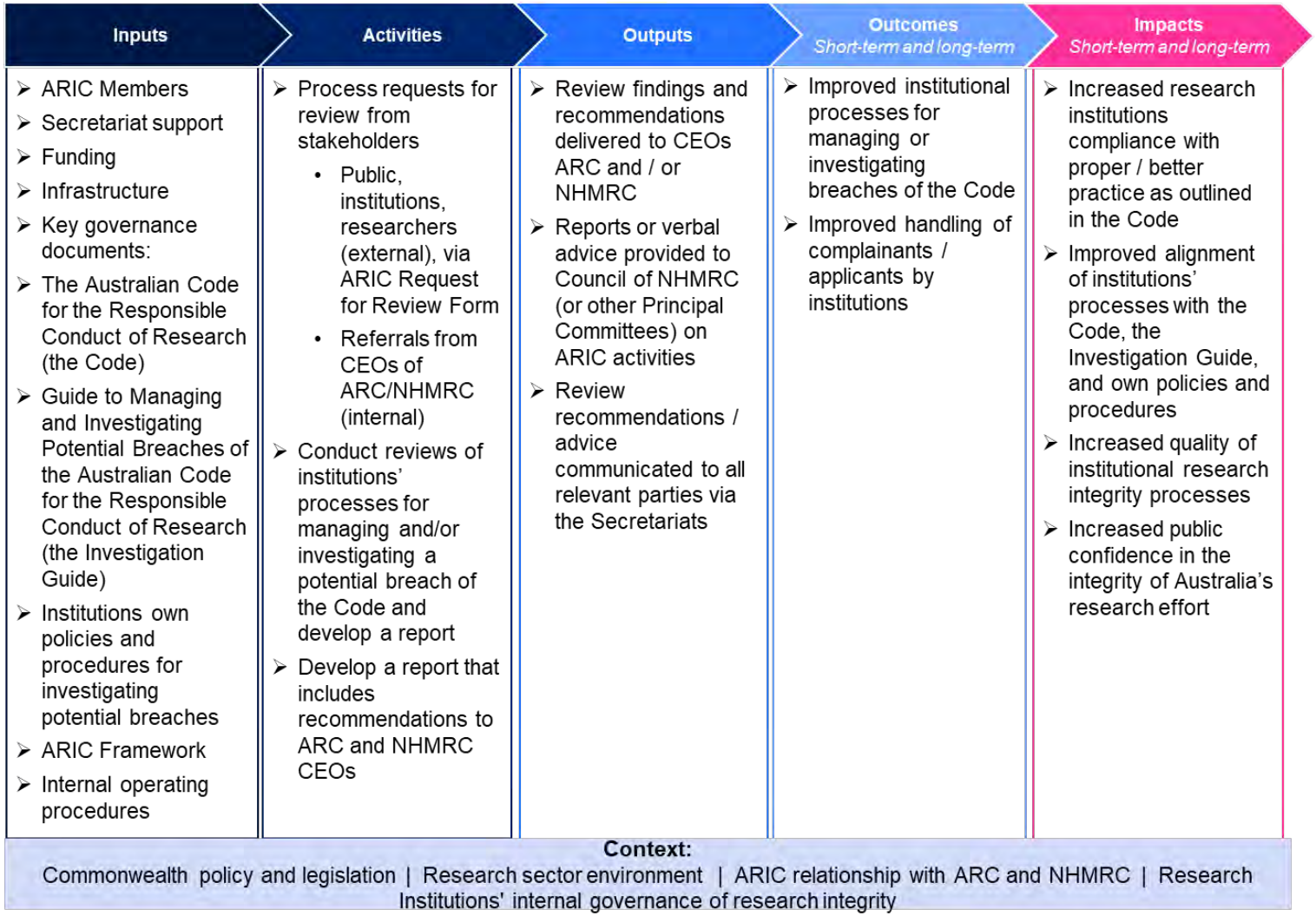
ARIC provides its advice to the CEO of the relevant funding agency (either NHMRC or ARC). In this report, "ARIC" is a reference to "NHMRC-ARIC" and "ARC-ARIC". ARIC uses the Guide as a benchmark for reviewing how an institution funded by NHMRC or ARC has managed a potential breach of the Code.[9]

[5] NHMRC, ARC & Universities Australia, "Australian Code for the Responsible Conduct of Research", 2018
[6] NHMRC, ARC & Universities Australia, "Australian Code for the Responsible Conduct of Research", 2018
[7] NHMRC, ARC & Universities Australia, "Australian Code for the Responsible Conduct of Research", 2018
[8] NHMRC & ARC, "Australian Research Integrity Committee Framework," 2019
[9] NHMRC, ARC & Universities Australia, "Guide to Managing and Investigating Potential Breaches of the Australian Code for the Responsible Conduct of Research", 2018

1.2.1 Program logic

The ARIC program logic illustrated in Figure 2 overleaf, reflects how ARIC intends to achieve its purpose and objectives. It articulates the relationship between desired outcomes, and the required inputs, activities, and outputs. These links were tested throughout the evaluation. The first key evaluation question (and sub-questions) was targeted to the appropriateness and effectiveness of ARIC. The second key evaluation question was intended to synthesise learning from across the evaluation to understand future opportunities for improvement.

Figure 2: ARIC program logic model (Source: KPMG)



1.2.2 The Framework

The Framework provides ARIC's terms of reference, and other relevant information such as the scope of an ARIC review and Committee procedures.10 The Framework was revised in 2019 to align with the provisions outlined in the 2018 Code. During a review, ARIC evaluates whether an institution's investigation into a potential breach was consistent with the Code, the Guide, and relevant institutional policies.

The responsibilities of ARIC are summarised in Table 4.

Table 4. Responsibilities of ARIC, as defined in the Framework (Source: The Framework)

The responsibilities of ARIC, as described in the Framework:
ARC and NHMRC jointly administer ARIC to: • Review, on receipt of a valid request, the processes by which an institution that is eligible to receive funding from the ARC and/or NHMRC has managed and/or investigated a potential breach of the Code. • Provide findings and, where relevant, recommendations to the CEO of the ARC and/or the CEO of NHMRC. • Provide reports or verbal advice to the Council of NHMRC or other Principal Committees, as requested, on the activities of NHMRC-ARIC. • Publish de-identified information on its activities at least annually. In all matters, ARIC considers whether the institution's response to a potential breach of the Code was consistent with the principles and responsibilities in the Code, the guidance in the Investigation Guide, and the institution's policies and procedures for investigating potential breaches of the Code. It is not the role of ARIC to determine whether a breach of the Code occurred.

1.2.3 Activities of ARIC

ARIC conducts reviews in response to requests from those involved in an investigation or other interested parties. On receipt of a request for an ARIC review, ARIC, supported by the relevant Secretariat, assesses the validity the application, and if accepted, commences a review.

In conducting a review, ARIC draws on documentation from the institution related to their consideration of, and response to, the potential breach, as well as any relevant material provided by the applicant. At the conclusion of an ARIC review, ARIC provides recommendations to the relevant funding agency CEO. Based on ARIC's advice and any other relevant considerations, the CEO responds to the relevant parties, providing recommendations for action, where appropriate.

In instances where institutions' investigation processes are determined not to have met the requirements of the Code or the Investigation Guide, the recommendations for action may include re-doing an investigation, providing additional information to relevant parties, or making adjustments to institutional processes for complaints handling or management of potential breaches under the Code, to ensure procedural fairness in future matters. In this way, ARIC contributes to public confidence in the integrity of Australia's research effort.

Information on the number of reviews conducted and their outcomes is summarised in the ARIC Annual Report to the Sector, together with de-identified case studies to explain some of the issues highlighted by ARIC's deliberations.

These issues can be categorised into perceived poor communication with the complainant and the timeliness, rigour, and comprehensiveness of the preliminary assessment. The FY 2021-22 report suggests that institutions need to strengthen communication consistency and stakeholder management with applicants. This includes providing reasons for the outcome of an investigation to

[10] NHMRC & ARC, "Australian Research Integrity Committee Framework," 2019

applicants, and ensuring updates to applicants are thorough, timely and reflect requirements for procedural fairness according to the Code.

The number of ARIC requests for review, between 2020-21 and 2021-22 is summarised in Table 5.

Table 5. Number of ongoing ARIC cases and new requests for 2020-21 and 2021-22 (Source: ARIC Annual Report 2021-22).

Financial Year	No. of cases carried forward	No. of new requests received	No. of new requests accepted	No. of new requests not accepted	No. of cases finalised	No. of cases active as at 30 June
2020-2021	6	8	5	3	6	5
2021-2022	5	10*	6	2	3	7

At the time of the analysis, two requests were pending, awaiting the outcome of an institutional investigation or further decision.

2 Evaluation Approach

This section provides an overview of the evaluation approach used to inform the findings and recommendations, and describes the evaluation scope and objectives, methods and limitations. The detailed evaluation approach is described in Appendix A of this report.

2.1 Purpose of this evaluation

This evaluation assessed the effectiveness of ARIC in meeting its purpose as outlined in the Framework and to make recommendations about membership, the Framework, and the management of ARIC, including current arrangements for Secretariat support, that could improve its effectiveness. This includes the following:

- The way in which ARIC receives requests for review, including decisions about which matters are within scope.
- The processes for conducting reviews, including the time taken to complete the review.
- The relevance of ARIC's advice to the respective CEOs, including its suggested recommendations to institutions.
- The satisfaction of stakeholders with ARIC's processes and outcomes.
- ARIC's relationship with institutions, including institutions' compliance and cooperation on reviews and the extent to which ARIC's recommendations are acted on when communicated to institutions.
- Whether ARIC's existence and role are known and understood by relevant stakeholders, including the extent to which institutions make information about ARIC available to relevant parties.
- What qualifications or mix of qualifications ARIC members should have and what is the best way of achieving an effective balance both in experience and numbers, including a suitable selection process to recruit new members.
- The operation of the Secretariat, including the split across the two agencies, particularly how this affects the Secretariat's support for ARIC members.

2.2 Key evaluation questions

To guide the data collection activities, the evaluation considered two overarching key evaluation questions and five sub-questions. These are listed in Table 6 below.

Table 6. Key evaluation questions and sub-questions (Source: KPMG)

Key evaluation questions	Sub-question
1 **To what extent is ARIC effective in meeting its purpose under the Framework?**	1.1 How effective is ARIC in conducting and managing requests for reviews?
	1.2 How effective are the outputs of ARIC reviews in informing decisions by NHMRC and ARC CEOs on how research institutions have managed potential breaches of the Code?
	1.3 To what extent are ARIC's recommendations appropriate and relevant to the NHMRC and ARC CEOs, research institutions and other stakeholders?
	1.4 To what extent is ARIC's existence and role known and understood by relevant stakeholders?

2	**To what extent is ARIC's contribution to Australia's broader research integrity system fit-for-purpose?**	2.1 What (if any) are the opportunities to improve or change the function of ARIC?

2.3 Evaluation methodology

2.3.1 Stage 1: Evaluation planning and design

The 'evaluation planning and design' stage included a project initiation meeting, and an evaluation design workshop with the NHMRC and ARC. These meetings confirmed and validated the scope and approach of the evaluation, including the program logic, evaluation questions, data matrix, and Evaluation Framework.

2.3.2 Stage 2: Data Collection

The evaluation drew on three main data streams: a desktop review of ARIC review documentation, semi-structured interviews, and a survey. These workstreams were utilised in the evaluation to collect qualitative and quantitative data, which were then combined and analysed to produce the final evaluation report.

Desk-top and case review

To map what was happening in ARIC reviews to elements of adherence to the Framework and Operating Procedures, a total of nine NHMRC and ARC ARIC cases were provided to KPMG for analysis from 2018 – 2022 (four cases from NHMRC-ARIC and five from ARC-ARIC Secretariat). The cases selected aimed to encompass a range of variables: the research institutions involved, subject matter and level of complexity and whether the institution implemented the recommendations or not.

ARC and NHMRC were responsible for selecting the cases for review and providing the relevant documentation to inform the case review process. A list of all documents relating to each case is provided in Appendix B. "Key considerations" about the way ARIC is intended to function were identified from the Framework and Operating Procedures. Information obtained from each case was considered against these key considerations, with an assessment made of the extent to which each element was met, and any gaps identified. A score was provided against each key consideration, providing an assessment of the extent to which fidelity to the Framework and Operating Procedures were achieved. Detailed case review findings can be found in Appendix C.

Semi-structured interviews

Thirty-eight semi-structured interviews were held between December 2022 to March 2023. The following stakeholder groups were involved in these interviews:

- ARIC members (including the Chair and previous ARIC members).
- Funding Agency representatives.
- Applicants.
- Commonwealth Government agencies.
- Peak and professional bodies and peak bodies.
- Heads of Administering Institutions (Non-Universities).

- Deputy Vice-Chancellors of Administering Institutions (Universities).
- Research Integrity Officers of Administering Institutions.

Appendix D lists the number of interviews conducted for each stakeholder group. Prior to each interview a consultation guide was provided to each interview participant that included the purpose and objectives of the project, topics of focus for discussion and information relating to consent, data collection, privacy and confidentiality. All consultation materials, including interviewer questions, interviewee questions were reviewed, and approved by ARC and NHMRC. The list of proposed individuals to be interviewed by KPMG was provided by NHMRC.

ARIC survey

The survey explored views on the extent to which ARIC is effective in meeting its purpose under the Framework and the extent to which ARIC's contribution to Australia's broader research integrity system is fit-for-purpose. Survey questions were developed by KPMG and included a combination of likert-scale and free-text response options. Conditional formatting was applied to each stakeholder group, ensuring each stakeholder response group received the appropriate set of questions.

The survey was released on Monday 13 February 2023, and closed on Sunday 26 February 2023. One reminder email was sent to stakeholders on Monday 20 February 2023. The distribution list for the survey was provided by ARC and NHMRC and included 269 email addresses. Stakeholders included representatives from: the Funding Agencies, Commonwealth Government agencies and departments, non-government organisations, universities, peak and professional bodies, research institutions, hospitals, and health services.

A total of 54 completed survey responses were received.

Qualitative data analysis

All semi structured interviews were transcribed capturing key discussion points under each question posed into Microsoft OneNote. The transcripts were translated into Microsoft Word line by line for thematic analysis by three KPMG staff members familiar with the evaluation. Free text survey responses were exported from the survey platform Forsta, into a Microsoft Excel spreadsheet, and copied line by line into Microsoft Word. Thematic analysis was completed on every line of interview feedback, and free-text survey responses. There are five steps in conducting thematic analysis:

- Familiarisation with the data to gain an overall picture of the consultations.
- Code and identify themes. This involves recording or identifying similar, repeated content or patterns in the data that are interesting and provide insight into the KEQs. Patterns are summarised and interpreted, then coded to develop an organised plan of thematic insights.
- Review, modify, and test themes to ensure they are mutually exclusive and collectively exhaustive and test relevant, emerging insights with key stakeholders in further consultations, to modify iteratively.
- Define themes to determine the scope, focus, and relationships between each theme, and identify key insights and findings from the consultations.
- Rank themes in each key evaluation question and sub-question relating to the frequency of stakeholder response.

All themes identified were included in the results. Themes were derived against each stakeholder group, for each key evaluation question and sub-question. A summary diagram was prepared for each key evaluation question and sub-question for the semi-structured interview themes, illustrating the themes derived from the semi-structured interviews across each stakeholder group and the ranking of that theme (based on frequency of responses).

Quantitative data analysis

The survey was a 20-item scale that gauged views to the key evaluation questions. On a five-point Likert-like scale, participants' levels of agreement ranged from strongly disagree to strongly agree. Each question's response distribution was shown as a percentage of respondents from each stakeholder group that was represented.

The transcripts of the semi-structured interviews were analysed thematically, with key themes providing the basis for analysis.

2.3.3 Stage 3: Reporting

The ‘reporting’ stage consolidates the observations and considerations synthesised in Stage 2. Preliminary findings and considerations were presented to the ARC and NHMRC for feedback. The Evaluation Report (the Report) was informed by this feedback.

2.4 Evaluation considerations and limitations

This evaluation focused on the context, effectiveness, and outcomes of ARIC. KPMG was provided with information on a select number of historical ARIC cases, internal NHMRC and ARC reporting, and other documentation to help inform this evaluation. The data and documentation provided to KPMG for analysis was not validated or assessed for completeness or appropriateness. KPMG was not responsible for the completeness, accuracy or reliability of the information provided by ARC and NHMRC and used as the basis for the evaluation.

KPMG consulted with a wide range of stakeholders using both interviews and surveys. Stakeholders included research institutions (particularly those with experience of ARIC reviews), applicants involved in an ARIC review, current and former ARIC members, academics, peak bodies, and Government agencies. These views have informed the discussion and findings in this report.

It should be noted that there was a low response rate to the survey. However, interviews were conducted with representatives of all institutions that have had recent interactions with ARIC as well as a significant proportion of applicants who have recently sought ARIC reviews.

3 Findings in response to key evaluation questions

This chapter discusses findings in response to the two key evaluation questions. These are organised into two themes of inquiry:

- The effectiveness of ARIC in meeting its purpose under the Framework (key evaluation question one), and
- The opportunities to improve ARIC (key evaluation question two).

3.1 Key Evaluation Question 1

To what extent is ARIC effective in meeting its purpose under the Framework?

Sub-question/s

1.1 How effective is ARIC in conducting and managing requests for reviews?
1.2 How effective are the outputs of ARIC reviews in informing decisions by NHMRC and ARC CEOs on how research institutions have managed potential breaches of the Code?
1.3 To what extent are ARIC's recommendations appropriate and relevant to the NHMRC and ARC CEOs, research institutions and other stakeholders?
1.4 To what extent is ARIC's existence and role known and understood by relevant stakeholders?

3.1.1 How effective is ARIC in conducting and managing requests for reviews?

Case review

ARIC procedures and considerations for a review

The Framework and Operating Procedures describe the scope of an ARIC review, outcomes, and document how ARIC should conduct and manage a review. These "key considerations" from the Framework and Operating Procedures about the way ARIC is intended to function are listed in Appendix C. Documentation from nine ARIC cases were assessed against the key considerations to determine whether compliance with the Framework had been met. An overall score of compliance was allocated to each identified procedure and activity listed below, alongside a description of key findings. Each of these are also explored in greater detail in Appendix C.

Of the nine cases selected for review, the following summary information provides relevant context for the case review findings:

- Two cases were accepted and are ongoing. In one case, the draft Report was not sighted as part of the case review.
- One case was rejected by the Chair.

- Six cases were concluded, with the final report and outcome communicated from the Funding Agency CEO.

Table 7. Case review observations of compliance with the Framework based on documentation for nine cases provided (Source: KPMG).

Key consideration from the Framework	Compliance rating	Key findings
1 Determining matters to be considered by NHMRC-ARIC or ARC-ARIC	**Reasonable compliance with the Framework**	• Accepted requests for review must relate to an institution receiving NHMRC or ARC grant funding. • Accepted request for review must relate to a review of the process used by an institution to manage or investigate a potential breach of the Code (not merits). • Accepted requests for review must relate to a matter that was within 12 weeks following formal notification from an institution about the outcome or must provide reasonable grounds for why this timeframe could not be met.
2 Request for review (application)	**Reasonable compliance with the Framework**	• In 88 per cent of cases reviewed, the Request for Review form was completed and submitted in accordance with Section 2 of the Framework. • In one case where this did not occur, there was no clear documentation regarding consideration by the Chair requiring the applicant to use the standard Request for Review form, and online submission. • In 55 per cent of cases reviewed, the request was submitted within 12 weeks following formal notification from an institution that it has finalised the preliminary assessment. • Acknowledgment letters and updates provided by the Secretariat to relevant parties within outlined timeframes in Section 2 of the Framework. (See requests for review, for further findings relating to the quality of information requests within this correspondence.) In three cases reviewed, the Secretariat correspondence was outside of the designated timeframes in the Framework.
3 Grounds for review	**Compliance with the Framework with opportunities to improve**	• In cases that were accepted for review, the summary document, draft, and final reports state the relevant procedural concerns derived from the Request for Review form, and accompanying documentation submitted by relevant parties. • In completing the Request for Review form, some applicants provide clear descriptions of how a breach of the Code or Investigation Guide has occurred. In these instances, the procedural concerns described in the draft and Final Report were clear. • From the documentation reviewed, it is not clear how the specific grounds for review are derived from the request for review and accompanying information. Furthermore, it is not clear how the Secretariat or Chair record how the grounds for review are satisfied prior to the decision to accept a request for review.

Key consideration from the Framework	Compliance rating	Key findings
4 Convening a review panel (including managing conflicts of interest)	**Reasonable compliance with the Framework**	• In cases that were accepted, ARIC panels comprised the Chair and at least two other members. ARIC member representation, including a comparison of the knowledge, qualification, and subject matter of the review across the cases reviewed, is summarised in section 3.1.1. • Broadly, the Committee members bring higher education, ethics, health law, quasi-judicial experience and knowledge required to conduct these reviews. This is sufficient to fulfill the purpose of ARIC. • In all cases reviewed, conflicts of interest were identified, disclosed, and managed in alignment with the Framework. For both NHMRC-ARIC and ARC-ARIC reviews, conflicts of interest are a standing agenda item.
5 Requests for information	**Compliance with the Framework with opportunities to improve**	• Information requested by ARIC from the applicant is broadly relevant to the procedural issues identified within the scope of review. • Correspondence does not generally articulate to the institutions how the requested information is relevant and necessary to the review. • ARIC panels provide different timelines for institutions to provide requested information, ranging from two weeks to three weeks and, on one occasion, an extension was also granted. Timeframes to provide requested information from the Secretariat are not specified in the Framework.
6 Procedural fairness and draft reports	**Reasonable compliance with the Framework**	• Seven of the nine cases reviewed had progressed to a draft report stage. Across these seven cases, ARIC panels provided institutions with the draft report and an opportunity to respond. Institutions provided substantial feedback and/or challenged findings or recommendations in the draft report in three reviews. • While there are no significant delays to the review process, the timeframes for reviews varied significantly. The average timeframe for ARIC reviews across the nine cases is 12 months, with a range of four to 21 months. • Timeframes are impacted by subsequent requests for information (one review), extensions granted (one review) and significant feedback or amendments to the draft report (two reviews). • The timeframes for these stages could be benchmarked to streamline the review process.

Key consideration from the Framework	Compliance rating	Key findings
7 Privacy	**Reasonable compliance with the Framework**	• Confidentiality deed polls are used to protect privacy and confidentiality across all reviews. There is one instance where the applicant refused to sign a confidentiality deed and ARIC subsequently did not provide them with the draft report. • ARIC does not consistently explain its approach to data and information handling, confidentiality and privacy to institutions involved in an ARIC review. One piece of correspondence states that documents will not be provided to the applicant and that the institution is able to make redactions. • There was one instance where an applicant requested anonymity, which ARIC maintained even when the institution requested to know the applicant's identity.
8 Draft and final report	**Reasonable compliance with the Framework**	• The development of report findings can be traced across review documents, particularly the summary and panel minutes. • All observed reports deal with the procedural issues raised, facts as provided by the complaint and evidence provided, and develop relevant findings and recommendations.
9 Recommendations and outcomes	**Compliance with the Framework with opportunities to improve**	• Draft reports were consistently shared with the institution for feedback on findings and recommendations, with recommendations amended in response to this feedback occurring in two cases. • Of the accepted and closed cases, two (33 per cent) made specific reference to the Investigation Guide and how implementation of certain recommendations would improve adherence. • The proportionality of recommendations is not consistently articulated.
10 Final outcome communicated from the funding agency CEO	**Reasonable compliance with the Framework**	• Of the cases that were finalised, in all instances the Funding Agency CEO communicated the final outcome of the review to institutions. • 55 per cent of the cases that were accepted and closed included steps that would be taken to implement the recommendations communicated from the institution to the relevant agency following the provision of the final report and advice. • Based on the reviewed cases, it is unclear what steps the Secretariat takes to monitor institutions' implementation of recommendations.

Stakeholder interviews

Underlying themes about how ARIC conducted and managed requests for reviews were revealed through interviews with research institutions, peak bodies, ARIC applicants, and funding agency representatives and are summarised in Table *8*. The themes are placed into the categories of Less Effective, Somewhat Effective, and Effective.

Less Effective – activities that are vague, ambiguous or that change throughout the review process that impact the effectiveness of conducting and managing requests for review.

Somewhat Effective – activities that achieve the outcomes of conducting and managing requests for review but might be improved to be more effective.

Effective – activities that achieve the intended outcomes of conducting and managing requests for review.

Less effective

Timeliness

All stakeholders discussed timeliness when commenting on ARIC's ability to effectively conduct and manage review requests.

Research institutions raised the following concerns that impact on timeliness in relation to ARIC reviews:

- Excessive number of requests from ARIC regarding documentation, data, and correspondence.
- Delayed responses and infrequent communications from ARIC.
- Unrealistic timeframes imposed on institutions by ARIC to provide information, for example, timeframes may be unfeasible for institutions with their limited resources.

ARIC members and funding agencies raised the following issues as impacting on timeliness:

- The lack of resourcing within the Secretariats.
- The excessive amount of information that is required to be analysed and assessed during the review process.
- Institutions may not respond immediately to requests for information, or they may pursue a legalistic approach.

Peak bodies and other entities raised the following issues in relation to timeliness:

- The lack of resourcing within the Secretariat and ARIC.
- Delayed responses and inadequate documentation/information provided by institutions.

ARIC applicants raised the following issues in relation to timeliness:

- Delayed responses and communications from ARIC.
- Lack of clarity around timeframes for the review. One applicant noted the case went on for nearly two years before being resolved.

Outside the framework

Some institution representatives claimed that ARIC operated beyond its scope by reviewing the merits of a case as opposed to the processes.

ARIC members and funding agencies noted that there can be confusion around ARIC's framework and scope by institutions and applicants which can result in a lack of understanding of the scope.

Whilst ARIC's focus is on the processes undertaken by an institution, there was acknowledgement that in complex cases it can sometimes be hard to separate process issues and merits review.

Resource intensive

Research institutions, ARIC members, funding agencies, peak bodies and other entities all stated that the ARIC review process is resource intensive.

Some research institutions described the ARIC process as time-consuming and administratively burdensome. They noted that the ARIC process involved providing copious amounts of documentation and information to ARIC within short timeframes. They also claimed that ARIC asked an excessive number of questions which further impacted timeliness.

Some ARIC members and funding agencies noted that navigating two Secretariats and two different IT systems is burdensome. Some also noted that they work part time with limited compensation which detrimentally impacts timeframes.

Somewhat effective

Clearer processes

Institutions, ARIC members, funding agencies and ARIC applicants all noted that existing processes could be improved to enable ARIC to better conduct and manage requests.

Institutions noted that ARIC could conduct and manage requests more effectively by:

- Establishing and using standard criteria when conducting and managing requests. Institutions emphasised they lacked clarity around the timeframes for reviews.
- Providing greater transparency around the standard criteria/rubric that ARIC uses during their review processes. For example, institutions would like ARIC to be clear in how they use criteria to accept/reject cases and how they review documentation to formulate recommendations and insights.
- Establishing well defined criteria on the roles and responsibilities within ARIC. Some institutions noted they were unsure and unaware of the roles/responsibilities of the Secretariat, ARIC, NHMRC and ARC CEOs.
- Remaining consistent in their requests; specifically, the documentation and data requested.
- Streamlining the processes and procedures ARIC undertakes when conducting and managing requests.
- Recruiting members within ARIC who have strong expertise and knowledge in conducting research and research integrity.
- Some institutions noted that ARIC panel members lacked practical/field experience in conducting research and creating sound processes.

ARIC members and funding agencies stated that they could conduct and manage requests more effectively by:

- Establishing and using standard criteria when conducting and managing requests. For example, creating clear criteria around timeframes for reviews.
- Creating and sharing a rubric to be used by ARIC members when conducting and managing requests. Some members noted this will support consistency and transparency.

ARIC applicants noted that ARIC could conduct and manage requests more effectively by:

- Establishing and using standard criteria when conducting and managing requests. Applicants highlighted that the timeframes for reviews were unclear.

- Clarifying their scope to manage review requests more efficiently.
- The process to write a complaint could be improved. One complainant noted that writing a complaint is onerous and difficult, and compiling all the required information is burdensome.

Relationships

All stakeholders discussed that relationships could be improved/strengthened to improve ARIC's ability to conduct and manage requests.

Research institutions described the following factors when discussing relationships in relation to ARIC reviews:

- Institutions would like more communication from ARIC as they conduct and manage reviews. Institutions noted that ARIC is not available or accessible to institutions.
- Some institutions raised the importance of maintaining confidentiality across the review process. While this independent case review did not find any evidence of ARIC or the ARIC Secretariat ever breaching confidentiality, continuing to ensure proper processes are followed with regards to confidentiality and sensitive information is important to building trust and strong relationships with the research sector.
- Institutions claimed that they are not heard by ARIC. Institutions noted that ARIC does not facilitate two-way conversations about how institutions can provide their inputs in response to requests for information. Additionally, institutions feel that ARIC repeats its advice across reviews, for example, they ask institutions to redo Preliminary Assessments or Investigations and ask Institutions to share full reports with complainants even when they contain sensitive information.

ARIC members and funding agencies described the following elements when discussing relationships:

- Some representatives noted that greater communication is required to build stronger relationships with institutions about ARIC matters.

Peak bodies and other entities noted the following elements when discussing relationships:

- Greater communication and improved trust with institutions would improve ARIC's ability to conduct and handle requests for review.
- Some respondents expressed beliefs that ARIC may not always be able to maintain confidentiality for reviews (N.B this independent case review did not find any evidence to support this belief, and conversely found that all ARIC case information had been managed in accordance with appropriate and publicly documented processes).

ARIC applicants stated the following when discussing relationships:

- Most applicants noted there was a lack of regular communication from ARIC and, when communications did occur, they felt they were not heard by ARIC.
- Two respondents voiced concerns that there may have been instances in the past where information related to reviews was shared outside of relevant parties. (N.B this independent case review did not find any evidence to support this contention, and conversely noted that ARIC case information had been managed in accordance with established and documented processes.
- Some applicants noted that the Secretariats should increase communications and strengthen relationships when conducing and managing reviews.

Effective

There were limited comments that indicated that ARIC effectively handled requests for reviews and conducted reviews. An ARIC applicant, an ARIC member and some research institution representatives did comment positively on the Secretariat's availability, accessibility, and frequent

communications. As discussed above, ARIC's professionalism, timeliness of their review request process, and clarity of the process were among the other positive comments provided.

Table 8. Summary of key themes from stakeholder interviews – How effective ARIC is in conducting and managing requests for reviews (Source: KPMG).

	Research Institutions	ARIC Members & Funding Agencies	Peak Bodies & Other Entities	ARIC Applicants
Less effective	**Timeliness** **Outside the framework** **Resource intensive** **Less effective** • Administrative burden	**Timeliness** **Outside the framework** **Less effective** • Lack of clarity **Resource intensive** **Less effective** • Roles and responsibilities	**Timeliness** **Resource intensive**	**Timeliness**
Somewhat effective	**Clearer processes** **Somewhat effective** • Standard criteria • Role and responsibilities • Transparency • Timeframes • Consistency • Streamlined approach • Knowledge gap **Relationships** **Somewhat effective** • Communication • Confidentiality, sensitivities and trust • Repeating the same things and not being heard	**Clearer processes** **Somewhat effective** • Transparency • Timeframes **Relationships** **Somewhat effective** • Communication • Trust	**Relationships** **Somewhat effective** • Communication • Confidentiality • Easier to ask other institutions or bodies	**Clearer processes** **Somewhat effective** • Timeframes • Limited scope **Relationships** **Somewhat effective** • Confidentiality, sensitivities and trust • Roles and responsibilities • Not being heard
Effective	**Effective** • Clear process • Timeliness • Professional • Communication (secretariat, accessibility, positive experience)	**Effective** • Clear framework • Communication (secretariat, ARIC)	**Effective** • Clear process	**Effective** • Communication

Key:

Less effective
Activities that are vague, ambiguous or change throughout the review process that impact the effectiveness of conducting and managing requests for review.

Somewhat effective
Activities that achieve the outcomes of conducting and managing requests for review but might be improved to be more effective.

Effective
Activities that achieve the intended outcomes of conducting and managing requests for review.

Survey results

The survey included a series of statements relevant to key evaluation questions for which participants were asked to indicate their view on a scale from Strongly Agree to Strongly Disagree.

Responses were sought as to whether research institutions, peak bodies and other entities, ARIC members and applicants thought that, in the current environment, ARIC acted within its scope and function as described in the Framework, as shown in Figure 4. the responses indicated that 50 per cent of representatives from peak bodies and other entities had a neutral response, 37.5 per cent agreed and 12.5 per cent strongly agreed (n=8). No peak body or other entity representative disagreed or strongly disagreed. Of applicants, 14.29 per cent disagreed, 28.57 per cent had a neutral response and 57.14 per cent strongly agreed. No applicants agreed or strongly disagreed (n=7). The responses indicated that 50 per cent of ARIC members agreed and 50 per cent strongly agreed (n=6). No ARIC members had a neutral response, disagreed, or strongly disagreed. Of the 30 institution representatives who responded, 13.33 per cent disagreed, 36.67 per cent had a neutral response, 36.67 per cent agreed and 13.33 per cent strongly agreed that, in the current environment, ARIC acted within its scope and function as described in the Framework. Overall, there was only a small proportion of stakeholders who did not think that, in the current environment, ARIC acted within its scope and function as described in the Framework. As they were either institutions or applicants, this may reflect their individual experiences or outcomes.

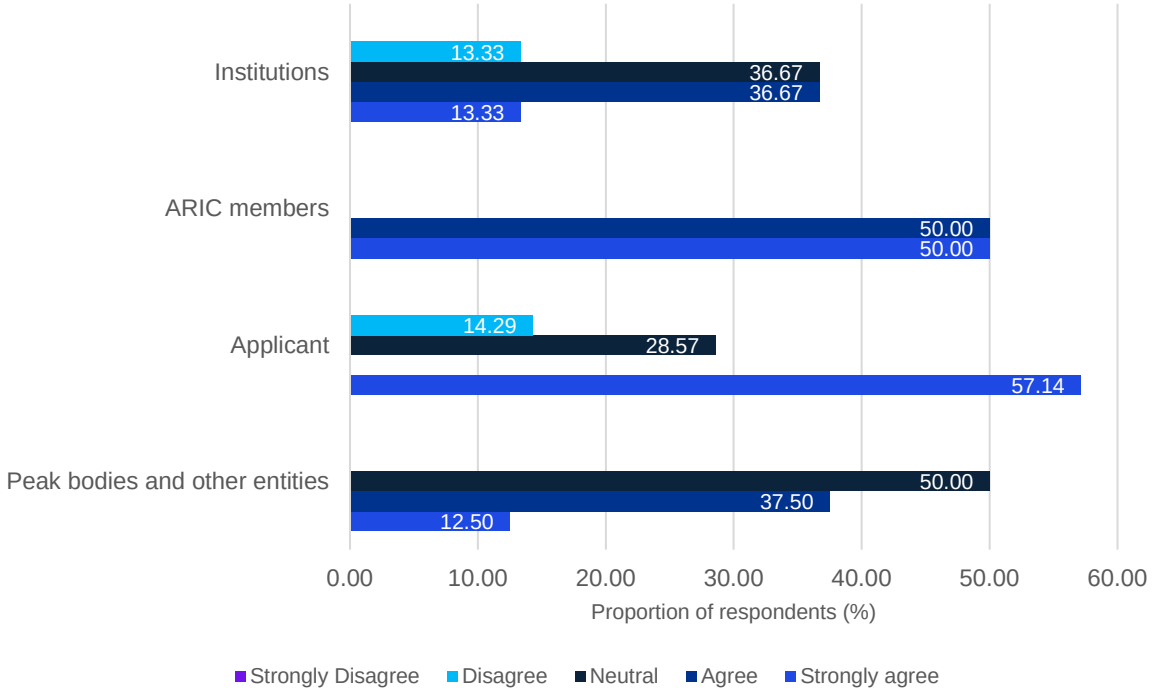


Figure 4. Survey responses about whether the peak bodies and other entities, institutions and ARIC members and applicants thought that, in the current environment, ARIC acts within its scope and function as described in the Framework.

Responses were sought as to whether research institutions, peak bodies and other entities and ARIC members and applicants considered ARIC's scope to be clearly defined. As shown in Figure 5, the responses indicated that 12.5 per cent of representatives from peak bodies and other entities strongly disagreed, 37.5 per cent had a neutral response and 50 per cent agreed (n=8). No peak body or other entity representative disagreed or strongly agreed. Of applicants, 14.29 per cent disagreed, 28.57 per cent had a neutral response and 57.14 per cent strongly agreed. No applicants agreed or strongly disagreed (n=7). The responses indicated that 83.33 per cent of ARIC members agreed and 16.67 per cent strongly agreed (n=6). No ARIC members had a neutral response, disagreed, or

strongly disagreed. Of the 30 institution representatives who responded, 3.33 per cent strongly disagreed, 3.33 per cent disagreed, 13.33 per cent had a neutral response, 53.33 per cent agreed and 26.67 per cent strongly agreed ARIC's scope to be clearly defined. Overall, there was only a small proportion of stakeholders who did not consider ARIC's scope to be well defined.

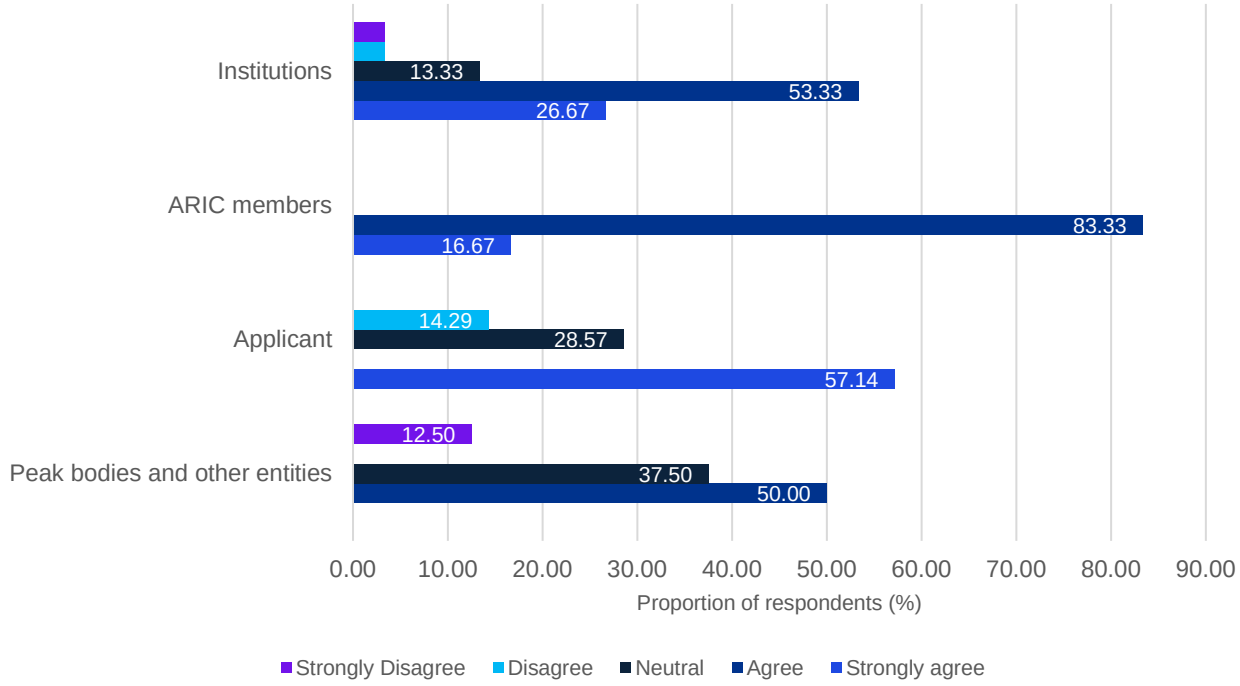


Figure 5. Survey responses about whether the peak bodies and other entities, institutions and ARIC members and applicants considered ARIC's scope to be clearly defined.

Responses were sought from research institutions and ARIC applicants as to whether they thought the criteria and grounds for an ARIC review were clearly defined and information was accessible. As shown in Figure 6, the responses indicated that 28.57 per cent of applicants disagreed while 71.43 per cent agreed. No applicants strongly agreed, strongly disagreed, or had a neutral response (n=7). Of the 13 institution representatives who responded, 7.69 per cent disagreed, 15.38 per cent had a neutral response, 53.85 per cent agreed and 23.08 per cent strongly agreed that ARIC's scope is clearly defined. No institution representative strongly disagreed. Overall, there was only a small proportion of stakeholders who did not consider that the criteria and grounds for an ARIC review were clearly defined and information accessible.

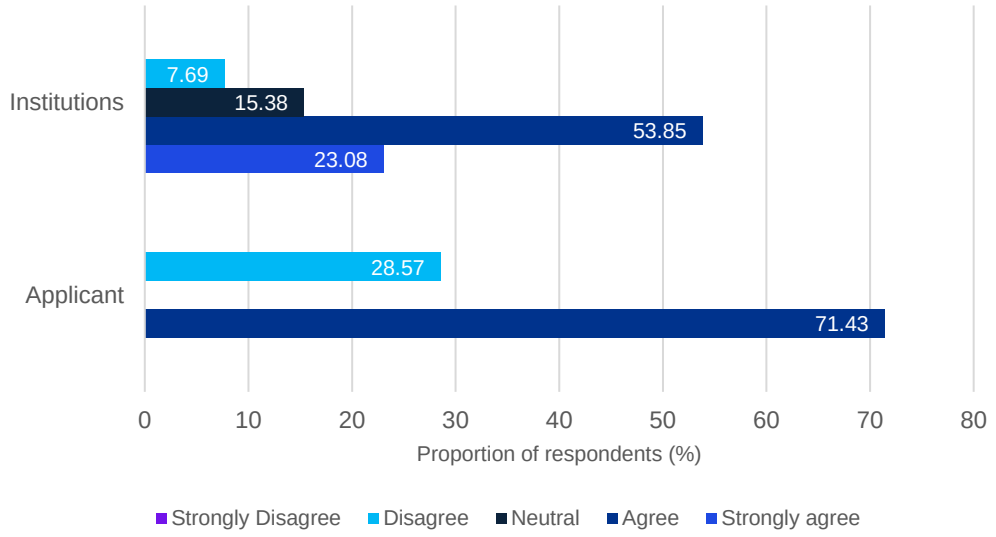


Figure 6. Survey responses about whether the institutions and applicants thought the criteria and grounds for an ARIC review were clearly defined and information was accessible

Responses were sought from research institutions and ARIC applicants as to whether they thought the information and documentation prepared by ARIC throughout the review process was appropriate and effective. As shown in Figure 7, the responses indicated that 28.57 per cent of applicants disagreed, 14.29 per cent had a neutral response and 57.14 per cent agreed. No applicants strongly agreed or strongly disagreed (n=7). Of the 13 institution representatives who responded, 23.08 per cent disagreed, 38.46 per cent had a neutral response and 38.46 per cent agreed that the information and documentation prepared by ARIC throughout the review process was appropriate and effective. No institution representative strongly agreed or strongly disagreed. Overall, there was a minority of stakeholders who did not consider that information and documentation prepared by ARIC throughout the review process was appropriate and effective, although there was more concern about this issue than with the previous questions.

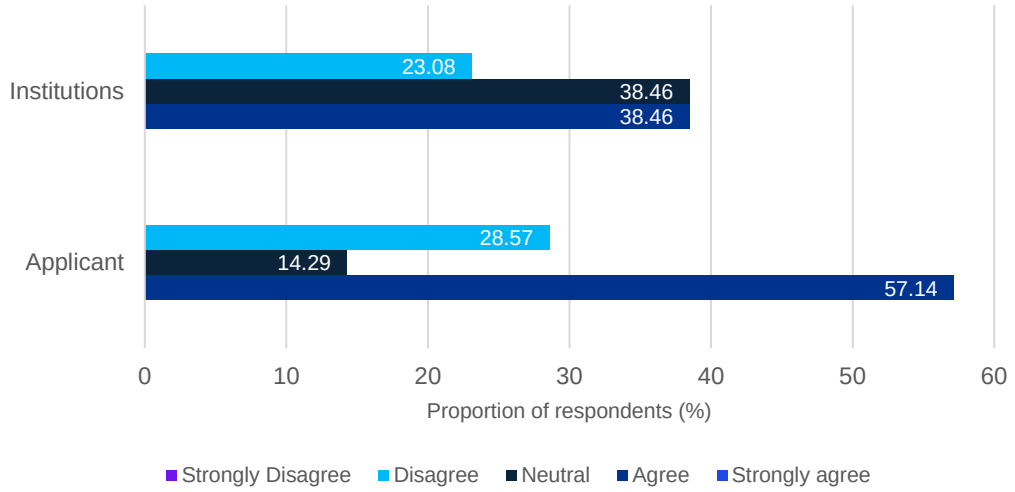


Figure 7. Survey responses about whether the institutions and applicants viewed information and documentation prepared by ARIC throughout the review process as appropriate and effective.

Open-ended survey responses

The survey included an option for respondents to provide open-ended responses. Responses from institution representatives, ARIC and funding agency members, ARIC applicants and peak body and other entity representatives were analysed qualitatively using a thematic analysis.

Seven main themes were identified:

- A need for clearer processes.
- Improved communication.
- Value of expertise on the Committee.
- Independence of structure.
- The Code.
- Education and training.
- The Secretariat.

Need for clearer processes

Representatives from research institutions commented on the following:

- The need for better defined and transparent criteria for decision-making processes relating to how ARIC initiates, manages and conducts investigations.
- A common concern raised was that ARIC's requests for information did not appear to relate to the process undertaken, but more to the merits of the matter.
- Continuing to ensure that confidentiality agreements are followed appropriately.
- It was noted that requests for information were resource intensive which could be improved by streamlining processes and requests being more exact about what is needed.

ARIC members discussed the following:

- Streamlining of Secretariat functions would assist the ability to progress cases. Transparent criteria for the review process were suggested as an example of this.
- Platforms and the system were a common concern. Differences in choice of platform and usability negatively impacted effectiveness in carrying out functions.

ARIC applicants commented on the following elements of clearer processes:

- Criteria used for decision making requires more transparency to improve understanding of how outcomes are determined.
- While the Framework determines that only processes may be considered in reviews, applicants noted that there can be some overlap with the merits of matters that creates ambiguity and leads to ARIC working with incomplete information.
- There is a need for more clarity on the scope of the review and procedures. There were concerns about fairness where much of the process was not visible, particularly communications between ARIC and institutions, which may raise doubts around impartiality.

Communication

Representatives from research institutions commented on the following elements of ARIC improving communication:

- Research institutions requested more regular updates on the progress of cases.
- Better two-way communication would improve the effectiveness of the review process.
- Meaningful change would be achieved across the sector by clear and consistent feedback.

ARIC applicants discussed the following:

- Applicants noted the lack of transparency about the progress of a review and the availability of the Committee for open dialogue.
- More regular updates on the process would improve the way ARIC conducts and manages reviews.
- There were some comments regarding the clarity of materials and communication from the Secretariat and concern that some fields of expertise were missing from the review panel. Additional support was suggested for those requesting reviews to address this imbalance.
- Timeliness of processes and length of time to close a review was a regular concern. The number of resources needed to complete a request and then provide ongoing information throughout the process was a source of frustration and impacted the effectiveness and relevance of materials and communication.

Expertise

Representatives from research institutions commented on the following elements on the value of expertise on the Committee:

- Research institutions noted the importance of having members of ARIC who have experience in research integrity management or operational knowledge. One stakeholder noted this would ensure recommendations were practical and able to be effectively implemented.
- While most thought the current skills of the Committee were appropriate, others identified gaps in expertise.
- Legal and administrative law expertise was commonly noted as desirable for ARIC functions.
- There were also several comments about having researchers involved who are at different stages of their career.
- A commonly held view was that roles and responsibilities should be more clearly defined within the Framework and maintained within ARIC.
- Creating membership categories in the Framework was a common suggestion to ensure appropriate representation and minimum requirements.

ARIC members and funding agencies discussed the following:

- ARIC members noted the importance of having experience in research integrity management or operational knowledge.
- Further comments on diversity of backgrounds and career stages in addition to experience in legal and administrative law were raised.
- Broad experience of Committee membership was seen as a strength of ARIC while many found the skills and qualifications appropriate to meet ARIC's functions.

Peak body and other entity representatives commented on the following elements on the value of expertise on the Committee:

- Ensuring balanced skills and diverse experience of ARIC members.

- One representative commented that the quality of work was as robust as possible (given limitations).

ARIC applicants discussed the following:

- Some applicants noted that the skills and expertise of Committee members were appropriate for the current remit; however, there were noticeable gaps in specialisation diversity and career stages. There was limited representation for certain fields (such as mathematics or chemistry and physics) while other fields seem over-represented.
- One applicant commented that the Chair should be required to be a High Court Judge or Professor of Law.
- Conflicts of interest on the panel should be better managed.

Independence of structure

ARIC members discussed the following:

- Separation of organisations and independence of ARIC from funding agencies was seen as vital to ARIC meeting its purpose.
- Fairness was noted as a key strength in conducting and managing reviews.

Peak body and other entity representatives commented on the following elements of independence:

- Separation of organisations and independence of ARIC was noted as a positive.
- A strength of ARIC was that processes were reviewed by an external body.

Education and training

Representatives from research institutions commented that they would like to see ARIC support the following elements regarding education and training:

- A focus on education and awareness is essential to maintaining a responsible research culture. It was noted that there have been initiatives within the sector to support the research community with related responsibilities, but it would be good to see ARIC support this.
- Research institutions noted the importance of education and training for smaller institutions to ensure they have sufficient resources to manage research integrity responsibilities. They thought ARIC could support this.

The Secretariat

ARIC applicants discussed the following:

- Applicants noted the high level of integrity and competency of the ARIC and the Secretariat staff.

ARIC members commented on the following elements regarding the Secretariat:

- ARIC members consistently recognised the competence and professionalism of the Secretariats as both a strength in conducting and managing cases and an important enabler for panel functions.
- Dual Secretariat functions would benefit from opportunities to learn from each other's experiences to improve case management and increase consistency across the Secretariat.
- Lack of resources and capacity was a huge impediment to carrying out functions in a timely manner.

3.1.2 Discussion

The effectiveness of ARIC in conducting and managing requests for reviews is explored in relation to the indicators proposed in the evaluation of ARIC data matrix, against this key evaluation question. The finding reference has been included in Table *9* below against each indicator.

Table 9. Key evaluation question 1(sub-question 1.1), indicators and discussion reference (Source: KPMG).

Evaluation question		Sub-question	Indicator	Discussion reference
1.0	To what extent is ARIC effective in meeting its purpose under the Framework?	1.1 How effective is ARIC in conducting and managing requests for reviews?	Analysis of ARIC research integrity process, including strengths and weaknesses of the ARIC review process.	The ARIC research integrity process, including strengths and weaknesses.
			Comparison of ARIC membership and selection process to the function and role of members to the experience of international research integrity committees.	ARIC membership, member qualifications and selection process, including stakeholder perception.
			Stakeholder perceptions of: • ARIC's role, profile, and function in contributing to research integrity in Australia. • ARIC's structure, member qualifications and selection process including its current/former members).	Stakeholder relationships and perceptions of ARIC's role, profile, and function. ARIC membership, member qualifications and selection process, including stakeholder perception.
			• Number of completed reviews per year. • Number of ARIC recommendations challenged by institutions per year • Time taken to complete reviews.	ARIC activity. Review timeframes and timeliness.

The way in which ARIC receives requests for review, including decisions about which matters are within scope

Request for review

A reasonable understanding exists among ARIC applicants regarding the process to request a review, and how to complete and submit the Request for Review form. This is evidenced by fidelity to Section 2 of the Framework discussed in the case review, with only one case where this process was

not followed by an applicant. Applicants demonstrate an understanding of how to seek a review. In 50 per cent (n= 5) of cases reviewed, the request was submitted within 12 weeks following formal notification from an institution that it has finalised the preliminary assessment.

The grounds for review (when identified by the Secretariat and Chair) have all met the requirements described in Section 2 of the Framework. The Secretariat and Chair appropriately identify the procedural concerns from the information provided in the Request for Review form and accompanying documentation. Applicants frequently raise issues outside the scope of ARIC, with this occurring in 40 per cent of cases reviewed. The frequency of this suggests applicants do not comprehensively understand and apply the Framework and/or Investigation Guide when seeking an ARIC review. While the scope of ARIC is clearly documented in the Request for Review form, Framework and the ARC/NHMRC-ARIC websites, applicants continue to raise out-of-scope issues for consideration in Request for Review forms. Interviews and free-text survey responses with ARIC applicants support this finding. Two themes explored above, relating to timeliness and clearer processes, provide further insight into the knowledge gap between the Framework, and translating this information into a Request for Review form. Applicants described a lack of clarity of materials and communication, and additional support should be considered for those requesting reviews to address this imbalance. Themes from applicant interviews also suggest that there is perceived ambiguity in the Framework, specifically relating to the differences between a review of institutional process and merit. The perceived ambiguity may contribute to applicants identifying concerns and issues in the Request for Review form that are out of scope for ARIC to consider.

Despite information available regarding the scope and purpose of ARIC, it is evident that applicants and other relevant parties are not accessing and/or understanding this when seeking or involved in a review process. An opportunity exists to create a greater shared understanding of ARIC among stakeholders. This proposal was raised in interviews and free-text survey responses. Clearer review processes will also enhance relationships and trust between ARIC, research institutions and other stakeholder groups.

Convening a review panel

The survey responses from research institutions and applicants highlighted that there are some expertise gaps, with applicants additionally detailing that certain fields of study are under-represented (particularly mathematics, chemistry, and physics), and other fields may be over-represented. It was further noted by institutions that some panel members were lacking experience in creating sound processes and conducting research. ARIC members, while noting the importance of having members with experience in research integrity management and operational knowledge, broadly found that the skills and qualifications that are currently within ARIC are appropriate.

Managing conflicts of interest

Declarations of interest are sought when a panel is convened, and any interests raised by panellists are discussed to determine whether they constitute a conflict of interest. Declarations of interests are standing agenda items in NHMRC-ARIC meetings, with standardised methods of managing interests across all NHMRC-ARIC reviews. There is limited documentation relating to managing conflicts and declarations of interest for ARC-ARIC reviews. However, where documentation regarding declared conflicts of interest is included in the report it is only in summary, and just mentions that declarations were sought and discussed when the panel was convened.

It was noted in the survey that only applicants highlighted that potential conflicts of interests could be handled in a more effective way. The whole process can be made more transparent by ensuring the processes by which interests are declared and determined to be or not be conflicts are documented and potentially included in reports when declared interests are not determined to be conflicts.

Request for information, procedural fairness, and draft reporting

Once a request for review is accepted, ARIC begins the process of collecting further information from the institution that the panel analyses to develop the draft report. ARIC aims to extend procedural fairness to all parties throughout the review. The principles of procedural fairness are defined in the Investigation Guide and referenced in the Framework. These include:

- Proportional.
- Fair.
- Impartial.
- Timely.
- Transparent.

Based on how the concept is applied to the administrative decision-making processes used by institutions, the Framework's concept of procedural fairness also requires:

- Attention to timeliness, including timely communication of information and outcomes.
- Adherence to defined processes, ensuring shared understanding between the parties.

There is limited clarity of process and shared understanding between parties to ARIC reviews, particularly of requests for information and timeframes within the review process.

Requests for information

Requests for information are a common and critical part of the ARIC review process, occurring in all accepted cases observed, generating an evidence base which is used to analyse the matter. The case review identified that the Secretariat's communication with institutions provided limited explanation of why information was requested, and how it would inform the ARIC review process. This finding corroborates the data collected from stakeholders at institutions who noted inconsistencies in the types of documentation which ARIC requested and the overall limited transparency around the processes or criteria used across ARIC reviews. Limited clarity of processes around requests for review creates confusion for institutions attempting to provide additional information and potentially presents an additional barrier towards ARIC obtaining relevant information.

Stakeholder interviews showed that there is no shared understanding between the different stakeholders about the detail, quantity and nature of information that is relevant to the review. Institutions noted that there was limited clarity of processes and that the volume of information ARIC requested was unrealistic based on the timeframes provided and the resourcing demands it created. From the ARIC perspective, members described that the review process generated excessive amounts of information.

From the institution's perspective, it can also appear that ARIC is focusing on the merits of the institution's inquiry/investigation where requests for information relate to how defined procedures were followed in the matter. In one case reviewed, for example, ARIC sent several requests for information detailing artefacts and evidence used in the inquiry and the institution later engaged legal representatives to respond to the review process.

Procedural issues

The institutions in the case reviews and stakeholder interviews expressed a broad lack of clarity around the ARIC review process, that would limit their understanding of requests for information. Further, ARIC panels do not reliably articulate the reasons why the requested information is necessary in the context of the review. In other words, how ARIC requests information generally does not provide the level of transparency or support needed for institutions to navigate the review process.

While the case review observed that requested information was broadly relevant to review subject matters, there is an opportunity for ARIC to be more targeted in its requests. Requests for information should clearly articulate for institutions why information is necessary. There are a range of benefits that might result from ARIC effectively articulating how the requested information aligns with the purpose of the review, including:

- Providing an opportunity for ARIC panels to critically reflect on the review scope, procedural issues, and subject matter.
- Increasing transparency around requests for information and across the review process for institutions.
- Limiting the volume of information that is needed to be provided by institutions and analysed by ARIC panels to what is most relevant to the review.
- Reducing the time and resources for institutions to process requests and provide the relevant information.
- Improving the accuracy and timeliness for ARIC to process information.
- Validating that requested information about institutions' inquiries/investigations directly relates to how processes were followed (as opposed to the merits of the review).
- Improving adherence to the Framework.

Furthermore, ARIC should broadly provide greater transparency to institutions about the process it uses to collect and synthesise information to produce findings and recommendations. Proactive ARIC engagement with, and education of, institutions should begin outside of the review context to ensure that institutions are informed and prepared to respond when a review does occur. This builds a shared understanding which ARIC can refer to in its correspondence and requests for information, streamlining the process of obtaining information while reducing confusion for institutions. Research institutions, ARIC applicants and ARIC members all noted that greater transparency can be facilitated through a standard criterion and/or rubric that provides clarity on:

- Roles and responsibilities between ARIC, the Secretariat and Funding Agencies.
- The scope of ARIC, particularly regarding accepting or rejecting cases for review.
- Clear criteria and/or benchmark review timeframes.
- How the panel assesses institutions' processes to investigate potential breaches of the Code, against the procedural concerns and documentation requested.
- The decision-making process to formulate recommendations.

Clearer review processes will also enhance relationships and trust between ARIC, research institutions and other stakeholder groups. Improved communication and information regarding ARIC review processes will also work to provide assurance regarding the management of scope (mitigating concerns that ARIC may investigate the merit of an investigation, compared to the process), and improve engagement with institutions and relevant parties across the review process.

Timeframes

All stakeholders noted a lack of clarity and challenges around timeframes in the review process. Beyond the initial acknowledgment of the request, and six-week update, timeframes are not benchmarked or specified in the Framework. As noted above, inconsistencies in the general timeliness of reviews and delays to timeframes stipulated in the Framework may have flow-on impacts for procedural fairness throughout the review process. Requests for information may also impact timeliness where they are constructed in overly broad terms or inquire too deeply into the review matter. While there are no significant delays to the process beyond the already identified instances

where ARIC did not respond to requests for review within six weeks, there are several factors that impacted timeframes in the reviews. These include subsequent requests for information, extensions granted and where there is significant feedback or amendments to the draft report.

Timeframes for requesting information and the overall process should be benchmarked to ensure reviews occur within appropriate timeframes. This will also limit the possibility of delays or untimeliness impacting procedural fairness to the parties.

Privacy

Privacy, and the obligations under the Privacy Act 1988 have been upheld and maintained, as observed from the case review. The Secretariats were observed to be proactive in maintaining privacy and confidentiality; for example, in one case certain parties refused to sign a confidentiality deed, so the draft report was not shared with those individuals. As noted above, some survey respondents expressed beliefs that there may have been instances in the past where review information was shared outside of relevant parties. This independent case review did not validate these statements, and conversely noted that proper processes were followed by ARIC and the ARIC Secretariat to maintain privacy and confidentiality. Continuing to ensure confidentiality is maintained throughout the review process is important to maintain confidence with stakeholder groups regarding how their information and data is managed

The draft and final report, recommendations, and outcomes (including the final outcome communicated from the funding agency CEO)

Refer to Key Evaluation Question 1.2 and 1.3 for the discussion of results relating to the outcomes of ARIC reviews.

Review timeliness and timeframes

All stakeholders discussed timeliness when commenting on the effectiveness of ARIC to conduct and manage requests. The case review documented that ARIC review timeframes are vary widely. Of the closed cases, timeframes from acceptance of the review to the final outcome communicated from the funding agency CEO ranges from four months up to 21 months, with the average timeframe being 12 months. The Framework or internal Operating Procedures do not benchmark ARIC review timeframes, and it was noted in many initial correspondences to relevant parties, that reviews are a lengthy process, often quoting a “up to a year” in order to set expectations among relevant parties of ARIC review timeframes. Findings from the case review suggest timeframes are influenced by the breadth of documentation provided by relevant parties to inform a review, and the responsiveness of research institutions and other parties to provide information to the Secretariat. The time taken to review and analyse information, document findings, and convene review panels was not available from the documentation sighted in the case reviews. All stakeholder groups considered review timeframes as an opportunity to improve the ARIC review process.

Themes from interviews with research institutions suggested the timeliness of ARIC reviews are impacted by the data collection process. As described in the section: *On requests for information, procedural fairness and draft reporting*, there are perceived excessive number of documentation and information requests, delayed responses and communication with ARIC and unrealistic timeframes imposed on institutions by ARIC to provide information. This theme was also expressed by ARIC members. As a result, research institutions, ARIC members and funding agencies all stated the review process is resource intensive. Interviews with these stakeholder groups noted this centred on the breadth of documentation requested, the number of information requests, and proposed timeframes to provide information to the Secretariat. Free text survey responses from applicants supported these findings, noting the number of resources needed to complete a request and then provide ongoing information throughout the process was a source of frustration and impacted the effectiveness and relevance of materials and communication.

Further analysis on the request for information and data collection element of the ARIC review process is explored above in the section: on r*equests for information, procedural fairness, and draft reporting***.**

Stakeholder feedback on review timeframes and timeliness is influenced by the extent of communication between the Secretariat and relevant parties, as well as clarity and an understanding of the review process. Strategies to improve communication throughout the review process were identified by research institutions and ARIC applicants, and include:

- Regular updates on the progress of a review.
- A two-way dialogue between the institutions and the Secretariat, and/or ARIC.

Greater communication and correspondence between ARIC and relevant parties will enable improved stakeholder relationships across the review process. Opportunities to improve clarity and transparency for stakeholders is discussed in the section: On r*equests for information, procedural fairness, and draft reporting*.

3.1.3 Conclusions and Recommendations

ARIC applicants generally had a reasonable understanding of the process to request a review, although their understanding of ARIC's scope was more limited. Applicants frequently raised issues outside the scope of ARIC, suggesting that they did not comprehensively understand the Framework when seeking an ARIC review. A greater shared understanding of ARIC among stakeholders, with clearer review processes, will enhance relationships and trust between ARIC, research institutions and other stakeholder groups.

Declarations of interest are sought when a panel is convened, and any interests raised by ARIC members are discussed to determine whether they constitute a conflict and only members without conflicts are included on a panel. The report identified a need for greater transparency around the process for managing conflicts of interest, with documentation required to ensure the process is clear and consistent. Requests for information are a critical part of the ARIC review process, but there were inconsistencies in the Secretariat's communication with institutions regarding why information was requested and how it would inform the ARIC review process. This could be addressed through clearer information for stakeholders about the detail, quantity, and timing of requests for information.

Review timeliness is a concern for all stakeholders. The average timeframe for ARIC reviews is 12 months, with a range of four months to 21 months. The breadth of documentation provided by relevant parties, the responsiveness of research institutions, and the number of information requests and proposed timeframes are factors that affect review timeframes. Stakeholders view review timeframes as an opportunity to improve the ARIC review process.

Relationships and perceptions of ARIC's role, profile, and function are essential to its perceived effectiveness. Strong relationships built on trust and transparency between ARIC and relevant parties are vital to view ARIC as an effective and valuable resource. Strained relationships between some institutions and ARIC can make it difficult to conduct reviews effectively. Findings suggest that building stronger relationships and improving communication between ARIC and relevant parties can enhance ARIC's effectiveness in conducting and managing requests for reviews. Regular updates on the progress of a review and a two-way dialogue between the institutions and the Secretariat or ARIC can help to improve communication and transparency.

Several opportunities for improvement have been identified throughout the ARIC review process, including clearer communication and more transparent processes for managing conflicts of interest, convening a review panel, and requesting information. Improvements in these areas could enhance the effectiveness of ARIC in conducting and managing requests for reviews and, in turn, increase the trust and credibility of the research integrity review process in Australia.

Recommendation/s

1. Secretariat to provide more information, including examples and case studies, to assist applicants to understand ARIC's scope and the review process.
2. Reduce administrative burden on both applications and research institutions by more fully articulating the information that is required and why. This approach would streamline the information required both by applicants and respondents.
3. ARC and NHMRC should review processes for conducting reviews and for better communication with parties throughout the review.

ARIC membership, member qualifications and selection process

Interviews with institutions highlighted that some ARIC members did not have experience conducting research. This was also discussed in the open-ended survey responses, where stakeholders from institutions, applicants, and ARIC members raised the importance of having members with experience in research integrity management and operational knowledge. ARIC members noted that the Committee has a broad range of skills and qualifications, which many felt were able to adequately meet ARIC functions.

There were a range of views amongst stakeholders regarding the skills and qualifications of ARIC members. Some institutions raised concerns that some ARIC members did not have experience conducting research and some applicants suggested that certain fields of expertise and study were under-represented in ARIC's membership. However, other stakeholders noted the importance of having members with experience in research integrity management and operational knowledge.

Research institutions frequently noted that legal and administrative law experience would be beneficial for ARIC's functions. This was noted in the case reviews, where there were cases where the institution took a more legalistic view of the Code which caused significant friction with the ARIC panel, and cases where lawyers and legal professionals were involved throughout the review.

ARIC members have a broad range of experience, qualifications, and skills which is one of its strengths. Table 10 below highlights a matrix of experience that shows the range of expertise held by ARIC members. There is scope for the Funding Agencies to bring in more skills and experience, such as those relating to research integrity and operations into the membership.

Table 10. Experience of current ARIC members (Source: NHMRC ARIC website).

Member	Senior Role in Research/ Higher Education Sector	Senior Government Official	Complaint Handling from a Range of Perspectives	Health Law/ Research in Private and Public Health Sectors	Government Legal Sector
Chair	✓	✓	✓		
D. Chair			✓	✓	
Member		✓	✓		✓
Member	✓		✓	✓	
Member	✓		✓		
Member	✓		✓	✓	✓
Member	✓	✓	✓	✓	

The selection process was discussed in interviews with funding agency CEOs. It was noted that ARIC member recruitment can be challenging; the remuneration offered, as well as finding appropriately

skilled, qualified and individuals with no significant conflicts of interest, were raised as barriers to recruiting more panel members. The current number of ARIC members can also be considered. ARIC members or the funding agency CEOs did not comment on the current size of ARIC. However, it may be worth monitoring to ensure the workload is distributed equitably and highlight if this is unsustainable for panel members.

Recommendation/s

4. Consider increasing ARIC's membership commensurate with its workload.
5. In replacing or expanding ARIC's membership, the following criteria be considered when recruiting:
    a. Knowledge of research integrity management;
    b. Law (especially administrative law);
    c. Career stage.
6. That ARC and NHMRC develop a structured approach to member recruitment in consultation with relevant experts and stakeholder groups, with a particular focus on methods to identify potential members.
7. Consider developing publicly available membership categories for ARIC, detailing the range of skills and expertise.

The Secretariat

The Secretariat is a critical enabler of the overall ARIC review process. Its responsibilities include processing and determining whether to accept requests for review, maintaining correspondence with all stakeholders in the matter, assisting the ARIC Chair, providing information and support to ARIC panels, supporting the development of the draft report, and keeping appropriate records of the ARIC review process.

The case review observed the Secretariat's significance to case management and progressing the review as the go-between for applicants, institutions, and ARIC. Across all cases, it ensured correspondence occurred with applicants and institutions, and enabled ARIC panels with case summaries, requests for information from stakeholders and recording meeting minutes and actions. Participants in stakeholder interviews also consistently recognised the competence and professionalism of the Secretariats as both a strength in conducting and managing cases and an important enabler for panel functions.

While the Secretariat is effective in fulfilling its responsibilities under the Framework and Operating Procedures, this Evaluation Report has identified the following gaps and improvement opportunities:

- There is duplication of responsibilities and functions between the NHMRC and ARC Secretariats. Greater collaboration or integration may improve learning opportunities, workload balances and consistency of outcomes between the Secretariats.
- Participants in the stakeholder interviews noted that the Secretariat's ability to drive the review process and ensure timeliness was significantly impacted by a lack of resources. Improving Secretariat resourcing might generate benefits in how ARIC extends procedural fairness to parties in the matter, by improving process timeliness and capacity to communicate with applicants and institutions.
- Based on the documentation provided for the case reviews, it appeared that the Secretariat did not record key elements of the review process or did so retrospectively once decisions and outcomes had occurred. For instance, the Secretariat did not record how the applicants had satisfied the formal requirements or grounds for review until it developed matter summaries after

requests had been accepted. It is important for the Secretariat to develop documentation (e.g. of the reasons for a decision) before decisions or outcomes occur to ensure the traceability and accountability of stakeholders and processes.

Recommendation/s

8. ARC and NHMRC consider increasing the resources available to the Secretariat(s).
9. The Secretariat(s) continue to find ways to streamline and harmonise processes across the two agencies.

3.1.4 How effective are the outputs of ARIC reviews in informing decisions by NHMRC and ARC CEOs on how research institutions have managed potential breaches of the Code?

Stakeholder interviews

The semi-structured interview approach used during stakeholder discussions resulted in a small number of responses to this question.

Underlying themes emerged through interviews with funding agency representatives, including CEO's and are summarised in Table 9. The themes are placed into the categories of Less Effective, Somewhat Effective, and Effective.

Less Effective - activities that are vague, ambiguous, or change throughout the review process that impact the effectiveness of informing decisions by NHMRC and ARC CEOs.

Somewhat Effective - activities that achieve the outcomes of informing decisions by NHMRC and ARC CEOs but might be improved to be more effective.

Effective - activities that achieve the intended outcomes of informing decisions by NHMRC and ARC CEOs.

Interviews and free-text survey responses provide limited further commentary regarding the extent to which the content in the draft and final reports are received by funding agency CEOs.

Less Effective

There were no activities that were found to fall into the 'Less Effective' category.

Somewhat Effective

Complexity and expectations misalignment

- In some cases, ARIC's recommendations were not fully accepted by CEOs due to the need for the CEOs to give consideration to the complexity of the issue, including other relevant factors. In other cases this was due to practicality and proportionality concerns.
- The decisions were based on the complexity of the situation and aligned with the expectations of the Funding Agency CEO.

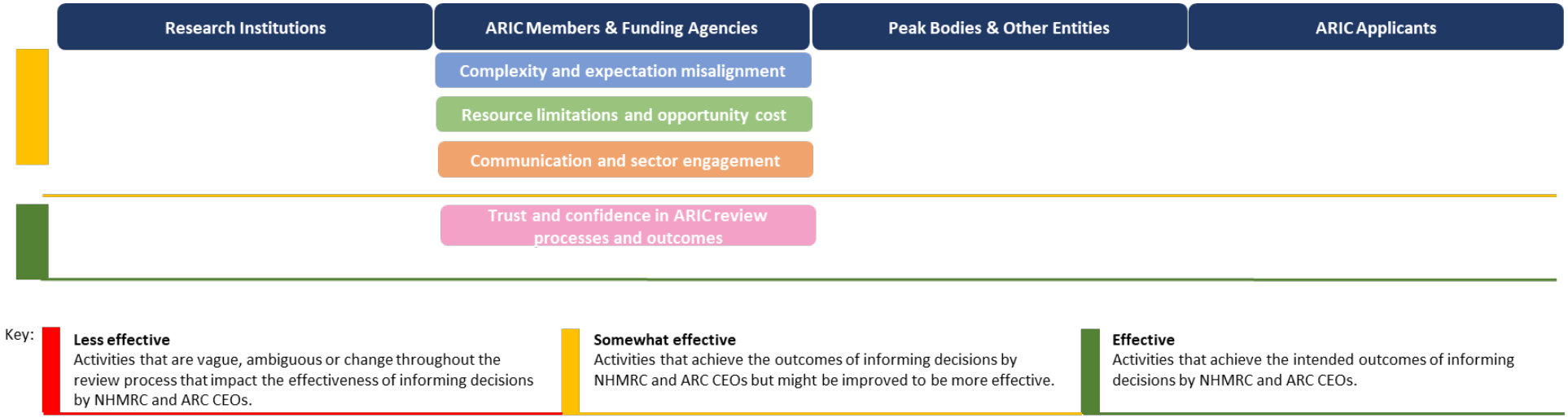
Effective

Trust and confidence in ARIC review processes and outcomes

- ARIC reviews effectively inform CEO decision-making.

- Trust in the comprehensive nature of ARIC reviews, and completeness of advice communicated to them were of instrumental in formulating the final advice.
- Trust in the review process was based on the skills, experience and capabilities of ARIC members, as well as the quality Secretariat outputs.

Table 9. Summary of key themes from stakeholder interviews – How effective are the outputs of ARIC reviews in informing decisions by NHMRC and ARC CEOs on how research institutions have managed potential breaches of the Code? (Source: KPMG).



3.1.5 Discussion

Table 11. Key evaluation question 1 (sub-question 1.2), indicators and discussion reference (Source: KPMG).

Evaluation question*		Sub-question	Indicator	Discussion reference
1.0	To what extent is ARIC effective in meeting its purpose under the Framework?	1.2 How effective are the outputs of ARIC reviews in informing decisions by NHMRC and ARC CEOs on how research institutions have managed potential breaches of the Code?	Comparison of ARIC recommendations and content in the final report and communications to the research institution.	On the draft and final report, including recommendations and outcomes.
			NHMRC and ARC CEOs' perspective of ARIC review and processes and recommendations.	Funding Agency CEO perspectives of ARIC review processes have been discussed in key evaluation question 1.1 Funding Agency CEO perspectives of ARIC review recommendations are discussed in 1.2.
			Extent to which NHMRC and ARC CEOs accept ARIC recommendations.	Discussion of key evaluation question 1.2.

The final outcome communicated from the funding agency CEO

ARIC reviews are finalised by the communication of the final report to institutions by the relevant funding agency CEO. The funding agency CEOs and institutions did not reject any proposals; rather, they all were either approved or were awaiting a response from the institution and/or CEO. The lack of recommendations being rejected by the CEO of the Funding Agency or the institutions themselves highlights the trust and quality of review findings, outcomes, and recommendations in ARIC reports, from the perspective of the funding agency CEO.

Generally, the case review found that decisions made by the funding agency CEOs were informed primarily by the outputs of ARIC reviews. In more complex cases, the funding agency CEO considered additional elements to inform their decisions. These included further correspondence with, and evidence provided by, the institution as well as the ARIC Chair, and the broader relationship between the funding agency and the institution. Interviews and free-text survey responses identified communication as an enabler for the effectiveness of ARIC outputs, in informing decisions by funding agency CEOs. Furthermore, more frequent opportunities for correspondence and communication will strengthen the outputs of ARIC reviews (from the perspective of research institutions). It should be noted, the ARIC Chair, ARIC members or the other stakeholders did not identify these themes in interviews or free text survey responses.

Funding agency CEO decisions and perspective on ARIC outputs are influenced by the following factors: the skills and experience of ARIC members, trustworthiness over the review process and the quality of ARIC outputs.

3.1.6 Conclusion

Funding agency CEO decisions and perspective on ARIC outputs are influenced by the skills and experience of ARIC members, trustworthiness over the review process and the quality of ARIC outputs.

Recommendations from ARIC are usually accepted without alteration by the CEOs of the funding agencies, which highlights the trust and quality of review findings, outcomes and recommendations in ARIC reports, from the perspective of the funding agency CEO. Decisions made by the funding agency CEOs were informed primarily by the outputs of ARIC reviews, with most outputs and advice provided by the ARIC Chair being accepted.

3.1.7 To what extent are ARIC's recommendations appropriate and relevant to the NHMRC and ARC CEOs, research institutions and other stakeholders?

Stakeholder interviews

Underlying themes that viewed ARIC's recommendations as appropriate and relevant to the NHMRC and ARC CEOs, research institutions and other stakeholders were revealed through interviews with research institutions, peak bodies, ARIC applicants, and funding agency representatives and are summarised in Table *12*. The main themes are placed into the categories of Less Appropriate and Relevant, Somewhat Appropriate and Relevant, and Appropriate and Relevant.

Less Appropriate and Relevant - activities that achieve clear, specific, and realistic recommendations to a small extent.

Somewhat Appropriate and Relevant - activities that achieve clear, specific, and realistic recommendations but might be improved.

Appropriate and Relevant - activities that achieve clear, specific, and realistic recommendations to a great extent.

Less Appropriate and Relevant

Timeliness

Research institutions emphasised the following elements of timeliness:

- Timeliness negatively impacts the relevance and appropriateness of ARIC's recommendations. It can take ARIC several months to produce recommendations and during this time those who conducted the research may have left the institution.
- The delayed timeframes and lack of updates and communication from ARIC encourages pushback against the recommendations.

Unrealistic and unfeasible

Some research institutions noted that ARIC's recommendations can be unrealistic and unfeasible.

Research institutions indicated:

- ARIC's recommendations can be time-consuming, expensive, and unfeasible to implement with their limited resources. Multiple institutions discussed the ARIC recommendation of repeating a Preliminary Assessment or Investigation. Repeating a Preliminary Assessment or Investigation takes a significant amount of time and resourcing.
- One research institute noted receiving contradictory recommendations and advice which limited their relevance and appropriateness.

- One institution discussed how it was their perception that ARIC breached their remit and provided recommendations around the merit of the investigation.

Lack of capability building

Numerous institutions commented that their ability to develop and improve their research integrity protocols was constrained by the unfeasible, impractical, and resource-intensive recommendations. One institution, for instance, reported that they were only able to put two of the five ARIC recommendations into practice. The time and money needed to implement the other three made them unrealistic.

Somewhat Relevant and Appropriate

Clearer processes

Institutions and ARIC applicants want information about the processes performed by ARIC to develop recommendations to be clear.

Research institutions described the following:

- They were not aware of the processes or criteria ARIC takes to review the documentation and provide recommendations.
- Institutions referred to the existing process as a "black box," in which institutions provide ARIC with a substantial amount of documentation, and ARIC produces recommendations without informing stakeholders of the processes taken.
- Institutions would like ARIC to explain how they produced their findings and recommendations to ensure they are appropriate and relevant.
- They highlighted the need for consistency in ARIC's information requests and recommendations. Compared to other institutions, several institutions noted that ARIC sought more information and evidence from them. Institutions also noted there was a lack of consistency in the recommendations provided with some given significantly more recommendations and feedback than others.
- Some institutions commented that ARIC's recommendations were limited in their ability to uplift university research integrity processes.
- Institutions emphasised that ARIC's recommendations were not enforceable. This is beyond the scope of ARIC, but institutions suggested creating a framework to oversee and monitor the implementation of recommendations.

ARIC applicants commented on the following regarding clearer processes:

- The applicants emphasised that ARIC cannot force institutions to follow ARIC recommendations. Although applicants accepted that this is beyond the remit of ARIC, they recommended that ARIC establish frameworks and procedures to ensure that recommendations are followed. Applicants stressed that institutions are not held accountable under the current procedures.
- Applicants also noted that some of ARIC's recommendations were limited in their usefulness to improve research integrity processes.

Education

Institutions stressed how useful it would be to understand the common feedback and recommendations provided by ARIC. To enable institutions to learn the typical errors made in relation to integrity processes, this information should be provided anonymously.

Appropriate and Relevant

Sensible and constructive

The recommendations provided to institutions were, according to some institutions, ARIC members, and applicants, sensible and constructive. The recommendations were deemed appropriate and relevant by these stakeholders because they were just and beneficial in improving research integrity procedures.

Building capability

Some institutions acknowledged that the recommendations made by ARIC contributed to the development of skills and knowledge related to research integrity procedures. One institution representative, for instance, indicated that the researcher was able to promote change and enhance the maturity of integrity processes at the institution due to ARIC's recommendations.

Responded positively to feedback

Some institutions were appreciative of the feedback provided by ARIC and the recommendations they received. These institutions responded favourably when ARIC pointed out their areas for development and offered practical suggestions to advance their research integrity procedures.

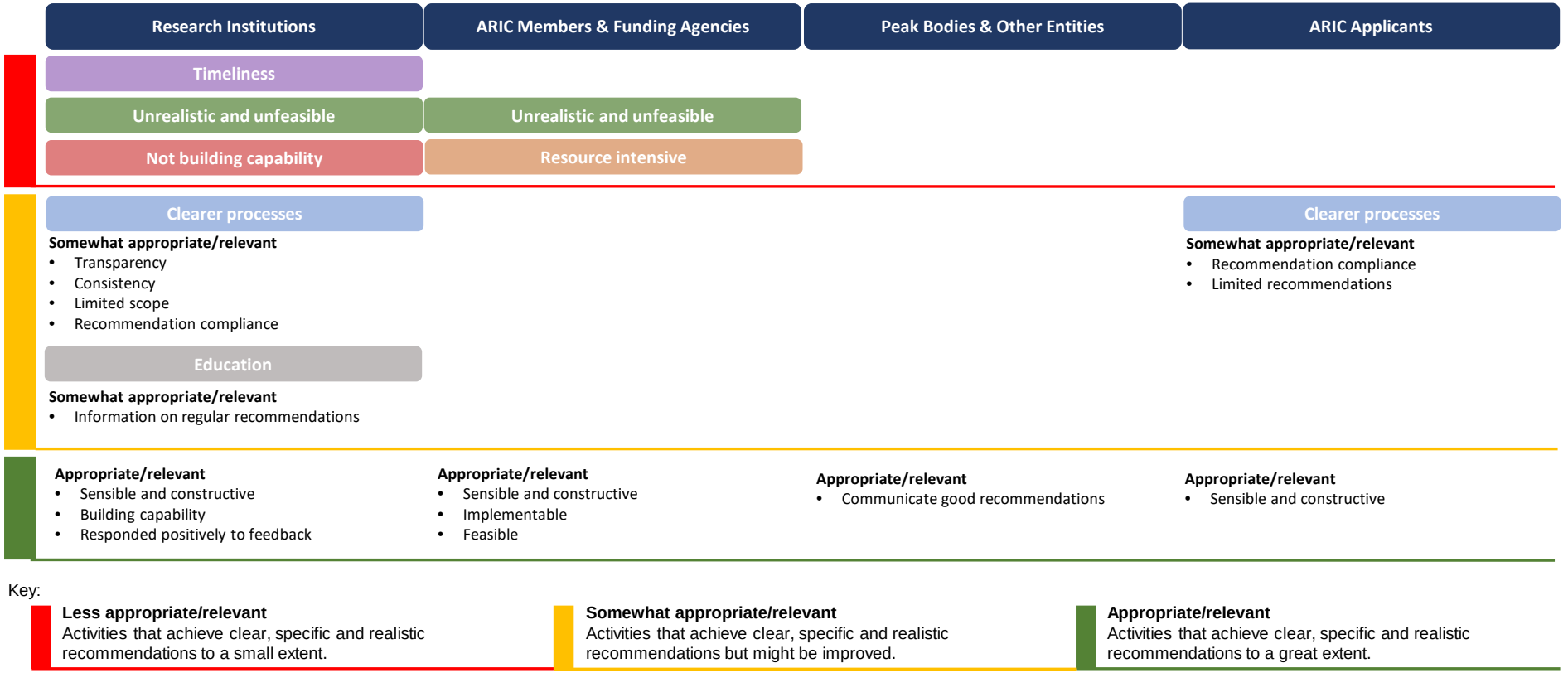
Implementable and feasible

Members of ARIC emphasised that significant efforts were taken to make sure that recommendations were both feasible and implementable for stakeholders. ARIC members saw that recommendations that required a considerable number of resources, such repeating a study, were only made as a last resort.

Communicate good recommendations

Funding agencies stated that ARIC offers relevant and appropriate recommendations for their consideration.

Table 12. Summary of key themes from stakeholder interviews – To what extent ARIC's recommendations are appropriate and relevant to the NHMRC and ARC CEOs, research institutions and other stakeholders (Source: KPMG).



Survey responses

The survey included a series of statements relevant to key evaluation questions for which participants were asked to indicate their view on a scale from Strongly Agree to Strongly Disagree.

Responses from the survey of research institutions and ARIC applicants were sought as to whether they thought the information and feedback provided in an ARIC review was reflected in the final advice communicated from the NHMRC or ARC. As shown in Figure 8, the responses indicated that 28.57 per cent of applicants disagreed, 28.57 per cent had a neutral response, 28.57 per cent agreed while 14.29 per cent strongly agreed. No applicants strongly disagreed (n=7). Of the 13 institutions that responded, 15.38 per cent disagreed, 38.46 per cent had a neutral response, 38.46 per cent agreed and 7.69 per cent strongly agreed that they thought the information and feedback provided in an ARIC review was reflected in the final advice communicated from the NHMRC or ARC. No institutions strongly disagreed. Overall, there was a minority of stakeholders who did not think that the information and feedback provided in an ARIC review was reflected in the final advice communicated from the NHMRC or ARC, although there was more concern about this issue than with the previous questions.

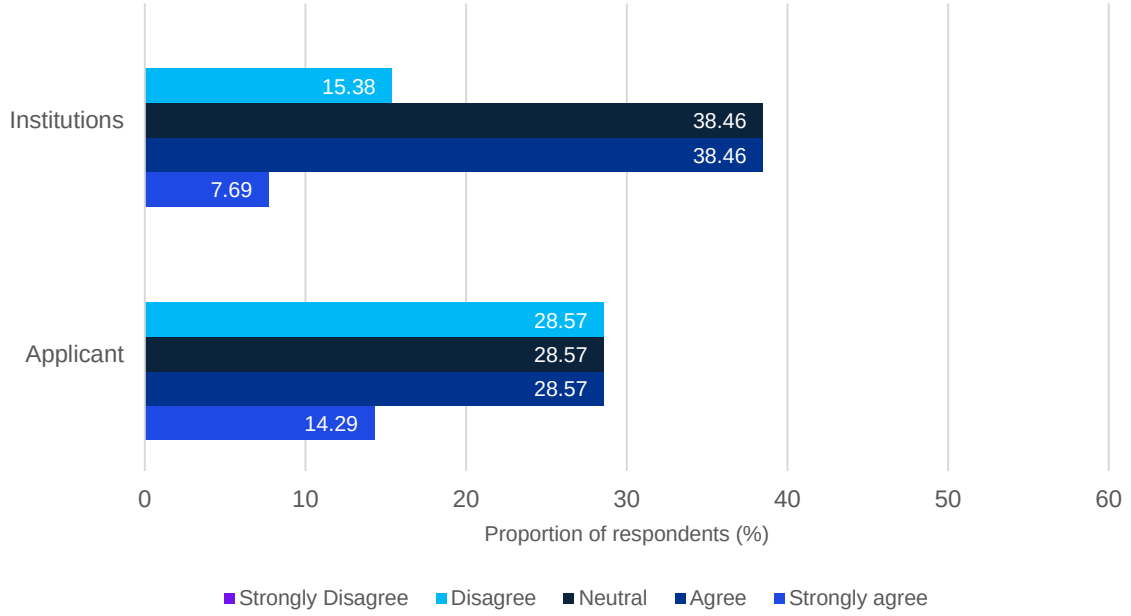


Figure 8. Survey responses about whether the institutions and applicants considered the information and feedback provided into an ARIC review was reflected in the final advice communicated from the NHMRC or ARC.

Responses from the survey of ARIC applicants were sought as to whether the ARIC review outcomes sufficiently addressed their reason for requesting a review. As shown in Figure 9, the responses indicated that 33.33 per cent of applicants strongly disagreed, 16.67 per cent disagreed, 16.67 per cent had a neutral response, 16.67 per cent agreed and 16.67 per cent strongly agreed (n=6). Overall, only two applicants considered the review outcome sufficiently addressed the reason for requesting a review.

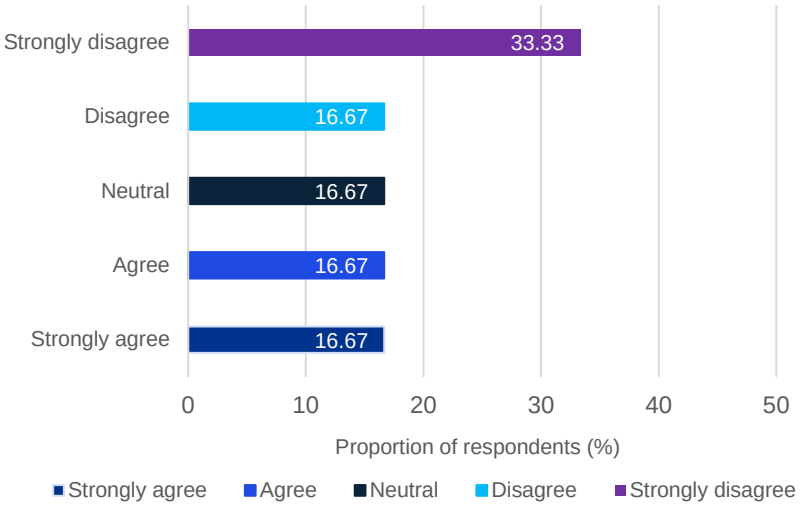


Figure 9. Survey responses about whether the ARIC review outcomes sufficiently addressed the applicants request for review.

Responses from the survey of research institutions, ARIC members and applicants were sought as to whether they were satisfied with the advice and recommendations from the ARIC review, communicated from the NHMRC and/or ARC CEO. As shown in Figure 10, the responses indicated that 33.33 per cent of applicants strongly disagreed, 16.67 per cent disagreed, 16.67 per cent had a neutral response and 33.33 per cent agreed. No applicants strongly agreed (n=6). The responses indicated that 83.33 per cent of ARIC members had a neutral response and 16.67 per cent agreed (n=6). No ARIC members strongly agreed, disagreed, or strongly disagreed. Of the 12 institutions that responded, 8.33 per cent disagreed, 41.67 per cent had a neutral response and 50 per cent agreed that they were satisfied with the advice and recommendations from the ARIC review, communicated from the NHMRC and/or ARC CEO. No institutions strongly agreed or strongly disagreed. Overall, the majority were satisfied with the advice and recommendations provided, although applicants had a more negative view.

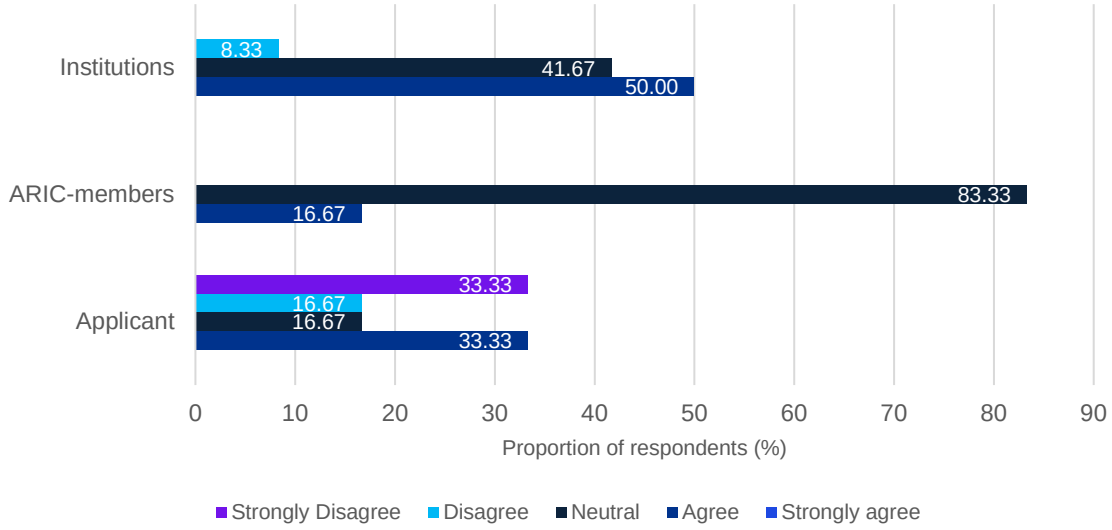


Figure 10. Survey responses about whether the institutions, ARIC members and applicants were satisfied with the advice and recommendations from the ARIC review, communicated from the NHMRC and/or ARC CEO.

Responses from the survey of research institutions and ARIC applicants were sought as to whether they considered the advice and recommendations communicated from the NHMRC and/or ARC regarding the outcome of the review to be relevant. As shown in Figure 10, the responses indicated that 33.33 per cent of applicants disagreed, 33.33 per cent had a neutral response, 16.67 per cent agreed while 16.67 per cent strongly agreed. No applicants strongly disagreed (n=6). Of the 12 institutions that responded, 8.33 per cent disagreed, 41.67 per cent had a neutral response and 50 per cent agreed that they considered the advice and recommendations communicated from the NHMRC and/or ARC regarding the outcome of the review to be relevant. No institutions strongly agreed or strongly disagreed. Overall, institutions agreed the advice and recommendations to be relevant more than applicants themselves. This may reflect their individual experiences or outcomes.

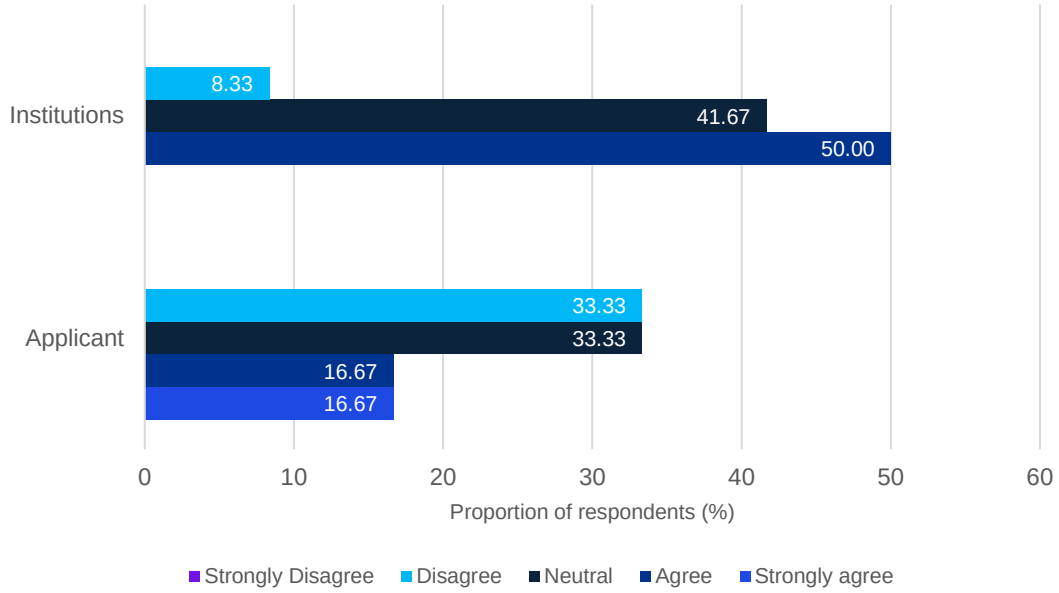


Figure 11. Survey responses about whether the institutions and applicants considered the advice and recommendations communicated from the NHMRC and/or ARC regarding the outcome of the review to be relevant.

Responses from the survey of research institutions and ARIC applicants were sought as to whether they considered the advice and recommendations communicated from the NHMRC and/or ARC regarding the outcome of the review to be appropriate. As shown in Figure 12, the responses indicated that 50 per cent of applicants strongly disagreed, 16.67 per cent disagreed and 33.33 per cent agreed. No applicants strongly agreed or had a neutral response (n=6). Of the 12 institutions that responded, 8.33 per cent disagreed, 50 per cent had a neutral response and 41.67 per cent agreed that they considered the advice and recommendations communicated from the NHMRC and/or ARC regarding the outcome of the review to be appropriate. No institutions strongly agreed or strongly disagreed. Overall, institutions considered the advice and recommendations to be appropriate more than applicants themselves. This may reflect their individual experiences or outcomes.

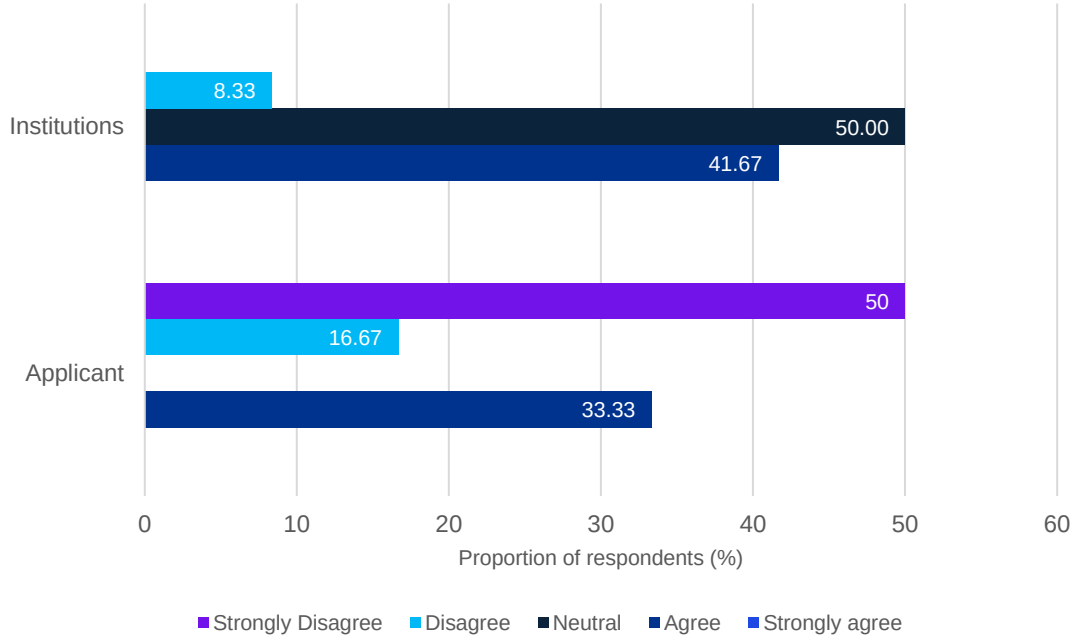


Figure 12. Survey responses about whether the institutions and applicants considered the advice and recommendations communicated from the NHMRC and/or ARC regarding the outcome of the review to be appropriate.

Responses from the survey of research institutions and ARIC applicants were sought as to whether they considered the advice and recommendations communicated from the NHMRC and/or ARC to be proportional to the initial complaint. As shown in Figure 13, the responses indicated that 33.33 per cent of applicants strongly disagreed, 33.33 per cent disagreed, 16.67 per cent agreed and 16.67 per cent strongly agreed. None of the institutions had a neutral response (n=6). Of the 12 institutions that responded, 50 per cent had a neutral response and 50 per cent agreed that they considered the advice and recommendations communicated from the NHMRC and/or ARC to be proportional to the initial complaint. No institutions strongly agreed, disagreed, or strongly disagreed. Overall, institutions considered the advice and recommendations to be proportional to the initial complaint while most applicants did not. This may reflect their individual experiences or outcomes.

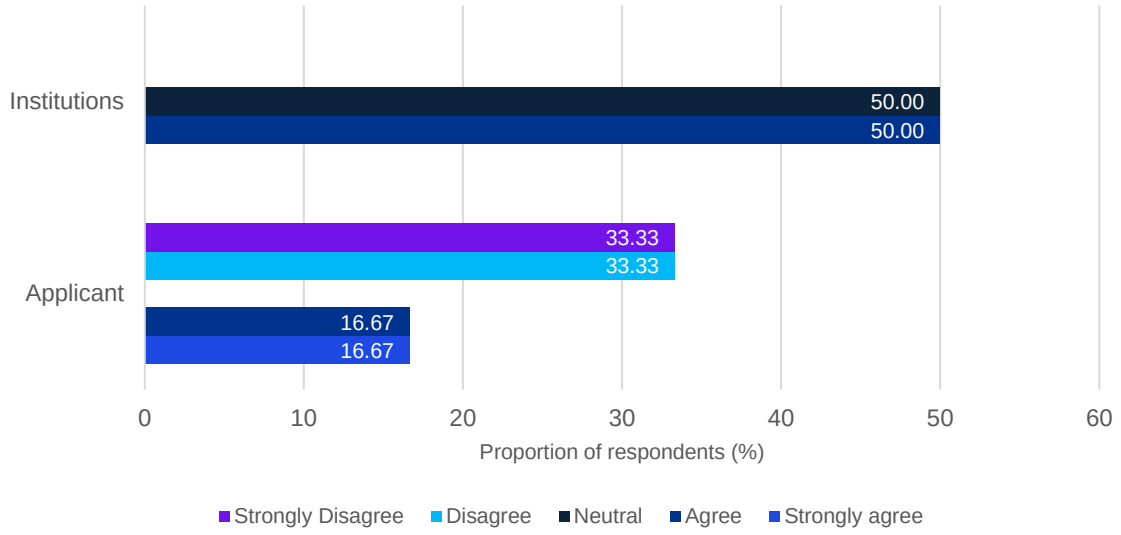


Figure 13. Survey responses about whether the institutions and applicants considered the advice and recommendations communicated from the NHMRC and/or ARC to be proportional to the initial complaint.

Responses from the survey of research institutions and ARIC applicants were sought as to whether they thought the advice and recommendations communicated from the NHMRC and/or ARC regarding the outcome of the review had been acted on. As shown in Figure 14, the responses indicated that 33.33 per cent of applicants strongly disagreed, 50 per cent disagreed and 16.67 per cent had a neutral response. No applicants agreed or strongly agreed (n=6). Of the 12 institutions that responded, 33.33 per cent had a neutral response and 66.67 per cent agreed that they thought the advice and recommendations communicated from the NHMRC and/or ARC regarding the outcome of the review had been acted on. No institutions strongly agreed, disagreed or strongly disagreed. Overall, institutions were satisfied that advice and recommendations had been acted on, however most applicants were not.

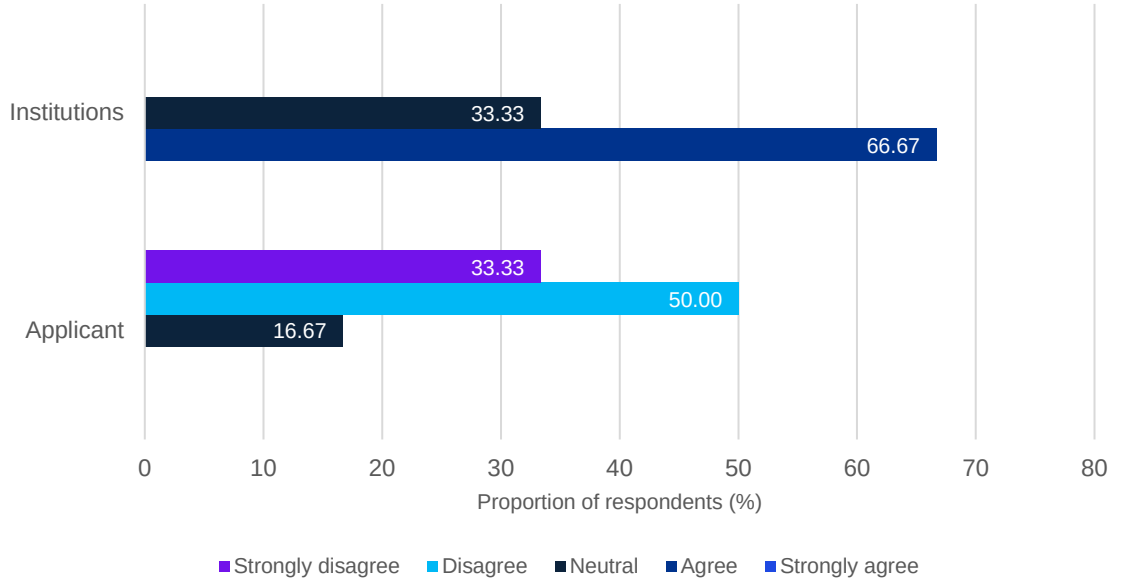


Figure 14. Survey responses about whether the institutions and applicants considered the advice and recommendations communicated from the NHMRC and/or ARC regarding the outcome of the review to been acted on.

Open-ended survey responses

Additional optional open-ended survey responses from institution representatives and ARIC applicants who stated they had participated in an ARIC evaluation were analysed qualitatively using thematic analysis.

Four main themes identified included:

- Visibility of ARIC and outputs
- Consistency and proportionality of advice
- Improved communication
- Resource intensive process.

Visibility

Representatives of research institutions indicated the following about visibility regarding ARIC and outputs:

- ARIC can protect Australia's 'gold standard' reputation by improving the visibility of the research integrity system and culture.
- Final recommendations following reviews should be visible to the entire sector to improve practices and keep local policies aligned with current expectations.
- Increasing visibility of advice and / or recommendations provides an opportunity for effective uplift.

Consistency and proportionality

The following was stated by representatives of research institutions regarding consistency and proportionality of feedback and recommendations:

- Some reviews provided appropriate and relevant outputs, but in other cases they did not, due to the mixed effectiveness of advice and recommendations. There was a lack of consistency in applying standards.
- In determining advice as part of an ARIC review, more consideration regarding the balance of costs and benefits plus impacts on all parties is appropriate. Further reflection would ensure proportionality, intended outcomes can be achieved, and recommendations are "readily implementable".
- Recommendations for improvements to research integrity processes need to be equitable and consistent across NHMRC and ARC.
- ARIC should determine advice and recommendations without having to go through NHMRC or ARC as CEOs are not experts in research integrity or procedural fairness.

Communication

Some ARIC applicants noted that a lack of transparency on the processes and outcomes obstructed a wider discussion in public forums from taking place. Secrecy was noted as detrimental to the functioning of the system as intended.

Resource intensive

ARIC applicants indicated that time and energy dedicated to request and review is wasted without independent review bodies and greater transparency.

3.1.8 Discussion

Table 13. Key evaluation question 1 (sub-question 1.3), indicators and discussion reference (Source: KPMG).

Evaluation question*		Sub-question	Indicator	Discussion reference
1.0	To what extent is ARIC effective in meeting its purpose under the Framework?	1.3 To what extent are ARIC's recommendations appropriate and relevant to the NHMRC and ARC CEOs, research institutions and other stakeholders?	Comparison of ARIC recommendations and content in the final report and communications to the research institution.	The final outcome communicated from the funding agency CEO.
			Sector perspectives of ARIC review processes and recommendations. Extent to which recommendations are recognised by the institutions and, where relevant, adopted.	The discussion of key evaluation question 1.1 – 1.3.

It is important to acknowledge that the recommendations made by ARIC panels are to the relevant CEO and not directly to the institution.

The draft and final report, including recommendations and outcomes

The case review analysed ARIC reports for their consistency with the overall review process and key documents, particularly the summary and panel minutes. Generally, there was a logical flow to how ARIC developed reports and no notable observations of inconsistency based on the key review documents. The review reports looked at as part of this Evaluation support the reader to understand the background to the matter and fact patterns, address procedural issues raised (in the summaries) and develop findings that are directly relevant to the matter and scope of the review.

The Investigation Guide was only referenced in recommendations in two of the six cases which developed recommendations. Articulating how recommendations contribute to closer adherence with the Investigation Guide – and subsequently the Code – could be a quick way for ARIC to increase recommendations' relevance and implementation value for institutions. Similarly, the reports observed did not rigorously consider the proportionality of recommendations as is required by the Framework. Reports did not make assessments to balance the importance of ensuring adherence to the Code with countervailing priorities such as the costs for institutions, as well as the scale of institution breaches or deviations from defined processes.

On the effectiveness and appropriateness of ARIC's recommendations

The effectiveness of ARIC's recommendations was assessed based on results from stakeholder interviews and the survey and informed by observations made during the case reviews above. Overall appropriateness has been considered based on data indicating the extent to which recommendations were specific, measurable, attainable, realistic, and timely.

Acceptance across the stakeholder groups, including the funding agency CEOs, research institutions and applicants, was a significant indicator of whether recommendations were appropriate. While there was general acceptance of recommendations by the funding agency CEOs, institutions and applicants displayed a variety of perspectives indicating that there were limitations to the appropriateness and relevance of ARIC recommendations.

The case review observed that recommendations were appropriate and relevant to the funding agency CEOs, given that all recommendations proposed by ARIC panels were accepted across the nine cases reviewed. This finding is consistent with stakeholder interviews involving the funding agencies that commented that ARIC communicates relevant and appropriate recommendations (see previous section).

Acceptance of recommendations and perspectives on whether they were appropriate and relevant varied among research institutions. The case reviews observed some instances where institutions acknowledged limitations within their academic integrity processes and accepted the need for ARIC recommendations. However, in other cases, it seemed unlikely institutions would implement recommendations based on resistance to the review process. These differences in acceptance were also present in the stakeholder interviews. While some institutions noted that recommendations were sensible, constructive and helped build capability, others described recommendations as unrealistic and unfeasible. Institutions' criticisms generally emphasised that recommendations were provided in an untimely manner, were expensive and did not consider resource limitations. This view considerably impacts the impetus and likelihood for recommendations to be implemented given that institutions emphasised ARIC's lack of enforcement powers. Additionally, institutions described how ARIC produces recommendations as a "black box", noting the substantial amount of documentation provided, and the lack of clarity and communication from ARIC about the broader review process. The results indicate that, in some circumstances, recommendations may have limited appropriateness and relevance for institutions. However, overall, almost all institutions (more than 90 per cent) when surveyed whether they were satisfied by ARIC advice and recommendations either agreed or responded neutrally. No institution responded "Strongly Disagree" to this question.

The perspective of applicants on the relevance of recommendations is focused on the extent to which the concerns, which underpinned their initial application for review, have been addressed. This is reflected in survey responses which found that 50 per cent of applicants strongly disagreed with the statement that ARIC recommendations regarding the outcome of the review were appropriate. Similarly, two-thirds of applicants either disagreed or responded neutrally when asked whether ARIC review recommendations and outcomes were relevant and effective to address their reasons for lodging a request. Critical views also came through in stakeholder interviews with applicants, including a perception that ARIC reviews too readily gave in to pressure from institutions (although it is noted that only two reports were amended at the request of institutions and the reasons for these changes appeared sound). While noting it was out of scope under the Framework, applicants also expressed concern that ARIC could not effectively respond to issues associated with the substance of cases and merits review. Overall, applicants had low levels of acceptance for ARIC recommendations and expressed significant concerns about their appropriateness.

3.1.9 Conclusion and recommendations

Overall, there was a logical flow to the way in which ARIC developed reports and no notable observations of inconsistency based on the key review documents were identified. The reports considered support the reader to understand the background to the matter and fact patterns, address procedural issues raised (in the summaries) and develop findings that are directly relevant to the matter and scope of the review.

Articulating how recommendations contribute to closer adherence with the Investigation Guide – and subsequently the Code – could be a quick way for ARIC to increase recommendations' relevance and implementation value for institutions. Similarly, the reports observed did not rigorously consider the proportionality of recommendations as is required by the Framework. Reports did not make assessments to balance the importance of ensuring adherence to the Code with countervailing priorities, such as the costs for institutions, as well as the scale of institutional breaches or deviations from defined processes.

The appropriateness and relevance of ARIC's recommendations vary among different stakeholder groups. Funding agency CEOs generally accepted the recommendations, while research institutions

showed a mixed response, with some acknowledging the limitations in their processes and accepting the need for recommendations, while others resisted the review process. Applicants, on the other hand, expressed significant concerns about the appropriateness and relevance of the recommendations, with low levels of acceptance and critical views on the effectiveness of the outcomes. The limitations in enforcement powers and lack of clarity and communication from ARIC about the broader review process were identified as significant challenges. While ARIC's recommendations may be appropriate and relevant in some cases, improvements are required to address the concerns of stakeholders and increase their effectiveness in improving adherence to the Code and the Investigation Guide.

Recommendation/s

10 Improve the alignment of recommendations with the Investigation Guide and the Code. This could be achieved by articulating how recommendations contribute to closer adherence with the Investigation Guide and subsequently the Code. This would increase recommendations' relevance and implementation value for institutions.

11 Consider the proportionality of recommendations as required by the Framework. Reports should make assessments to balance the importance of ensuring adherence to the Code with countervailing priorities such as the costs for institutions and the scale of institutional breaches or deviations from defined processes.

12 Improve timeframes for reviews to avoid recommendations becoming redundant or difficult to implement due to the passage of time.

13 Secretariats should undertake more systematic monitoring of institutions' implementation of recommendations to understand why institutions are not or are slow in implementing ARIC recommendations.

14 ARC and NHMRC should make information about review outcomes and lessons learned (in ARIC Annual Reports) more obvious on the agency websites and use the information in communication and outreach activities with institutions and other stakeholders.

See also recommendations 1 and 3.

3.1.10 To what extent is ARIC's existence and role known and understood by relevant stakeholders?

Stakeholder interviews

Underlying themes about the extent to which ARIC's existence and role were known and understood were revealed through interviews with research institutions, peak bodies and other entities, ARIC members and applicants, and funding agency representatives and are summarised in Table 14. The main themes are placed into the categories of Less Known and Understood, Somewhat Known and Understood, and Known and Understood.

Less Known/Understood - ARIC's existence and role is poorly understood or not known by stakeholders.

Somewhat Known/Understood - ARIC's existence and role is known by stakeholders but might be improved.

Known/Understood - ARIC's existence and role is known by stakeholders.

Less Known and Understood

Poor understanding

Interviews with research institutions, peak bodies and other entities, ARIC members and applicants, revealed that generally little was known about ARIC's existence or role. Some stakeholders considered that ARIC's purpose and scope were unclear.

Research institutions indicated the following about understanding ARIC's role:

- That the sector's perception of ARIC was unclear.
- The nature and scope of ARIC were not well understood by the complainants and respondents.
- They considered ARIC to be a high-level body to which to appeal.
- Some stakeholders were not aware of the procedures ARIC took nor that ARIC existed.
- Terms of reference not clear.

ARIC members and funding agencies discussed the following:

- According to one representative, there appear to be confusion in the sector about what ARIC should and should not be commenting on.
- Only a small number of Australian universities have had cases considered by ARIC. This may be due to a lack of awareness around the role and scope and purpose of ARIC.
- The internal processes followed by ARIC are not necessarily transparent or well known to institutions creating distrust and confusion.

Peak bodies and other entities commented on the following elements of ARIC's existence and role:

- The roles and responsibilities of ARIC were unclear.
- The group of eight universities do reference ARIC, but it is unknown how much is translated across into practice and how many researchers understand ARIC's role. It is sometimes challenging to relay this information to researchers.

ARIC applicants noted that:

- It took months to work out that ARIC existed.
- Unclear what the purpose of ARIC was.

Somewhat Known and Understood

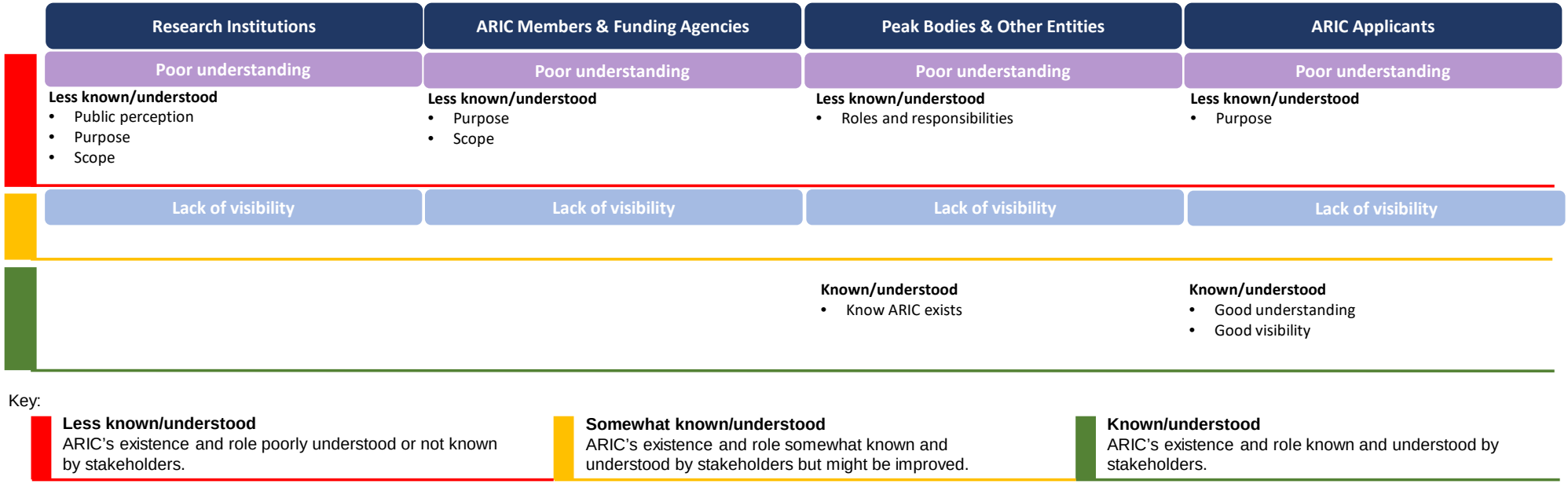
Lack of visibility

All stakeholders involved agreed that more visibility would help to better understand ARIC's function. Stakeholders agreed that despite ARIC's existence and purpose being somewhat known and understood, they felt they lacked visibility in the broader research integrity space.

Known and understood

One peak body representative made it clear that they were familiar with roles and functions of ARIC. ARIC had considerable visibility, according to one applicant who claimed to understand ARIC's purpose and existence.

Table 14. Summary of key themes from stakeholder interviews – To what extent ARIC's existence and role is known and understood by relevant stakeholders (Source: KPMG).



Key:

Less known/understood
ARIC's existence and role poorly understood or not known by stakeholders.

Somewhat known/understood
ARIC's existence and role somewhat known and understood by stakeholders but might be improved.

Known/understood
ARIC's existence and role known and understood by stakeholders.

3.1.11 Discussion

Table 15. Key evaluation question 1(sub-question 1.4), indicators and discussion reference (Source: KPMG)

Evaluation question*		Sub-question	Indicator	Discussion reference
1.0	To what extent is ARIC effective in meeting its purpose under the Framework?	1.4 To what extent is ARIC's existence and role known and understood by relevant stakeholders?	Stakeholder perceptions of ARIC review processes and recommendations.	The discussion of key evaluation question/s 1.1 – 1.4.
			Extent to which institutions share information about ARIC review outcomes to relevant parties.	

To ensure reviews are completed effectively with clear outcomes, it is essential that stakeholders are aware of ARIC's existence and understand its role and processes. Generally, the results showed that there was limited awareness of ARIC's existence and role across research institutions, peak bodies and ARIC applicants.

Critically, research institutions displayed low levels of awareness of ARIC's existence, potentially impacting the efficiency of reviews and institutions' receptivity to recommendations. Stakeholder interviews showed that institutions had an overall poor understanding of ARIC's purpose and scope, as well as an overall lack of visibility of ARIC. This limited understanding came through in institutions' correspondence with ARIC during the case reviews, requiring significant clarification around the process and stakeholder responsibilities and obligations. In one case, an institution acquired legal representation to support it to understand ARIC's review process, limiting open communication and the likelihood that recommendations would be implemented.

Applicants, on the other hand, generally had a better understanding of ARIC. It is possible that this understanding arose from the significant time and energy that applicants reported was needed to submit a request for review. On this basis, there could be a range of impacted persons who did not a lodge a request for review because of a poor understanding or limited visibility of ARIC. To ensure that ARIC is effectively supporting applicants, it should aim to build awareness and understanding among academics and research institutions.

3.1.12 Conclusion and recommendations

Overall, the findings indicated that research institutions, peak bodies and ARIC applicants had limited knowledge of ARIC's existence and role. The effectiveness of the review process and the institutions' responsiveness to recommendations may be improved by increasing ARIC's visibility and engaging early and often with institutions to ensure there is shared understanding of processes, responsibilities, and roles within ARIC reviews and ensuring adherence to the Code.

Recommendation/s

15. NHMRC and ARC, in consultation with ARIC, develop a communications strategy to improve the sector's knowledge of ARIC and to encourage institutions to ensure they make information about ARIC available to all those involved in research integrity processes.

3.2 Key Evaluation Question 2

2 To what extent is ARIC's contribution to Australia's broader research integrity system fit-for-purpose?

Sub-question:

2.1 What (if any) are the opportunities to improve or change the function of ARIC?

3.2.1 What (if any) are the opportunities to improve or change the function of ARIC?

Stakeholder interviews

Underlying themes about the opportunities to improve or change the function of ARIC were revealed through interviews with research institutions, peak bodies, ARIC members and applicants, and funding agency representatives. Table 16 provides a comparison of the key themes and sub-themes ranked by frequency of response across stakeholder groups.

Six overarching themes emerged from stakeholder interviews as follows:

- An approach to education and training
- Making processes clear
- Strengthening relationships
- Raising awareness of ARIC
- Dealing with timeliness
- Need to increase resourcing for ARIC.

Research institutions

Education and training

- Stakeholders emphasised that case studies might be utilised to increase understanding.
- Many stakeholders would like to see ARIC providing awareness of best practices, ethics, rules and regulations covering all aspects of research integrity.
- Another frequent response suggested the need for information sessions to further educate research institutions on all things related to research integrity, as well as supporting research institutions to develop capabilities for successful research.
- Stakeholders asked ARIC to present a position articulating its view on emerging challenges.

Clearer processes

- Sufficient visibility of the review process used by ARIC to make i decisions and recommendations was the most frequent response.
- Maintaining a breach register was another common response.
- For facilitating the assessment of reviews, many stakeholders requested the use of benchmarking and rubrics to better define the criteria and expectations.
- Numerous stakeholders requested more thorough explanations of the results and recommendations from ARIC, as well as consistent and standardised reporting.

- Ensure that decisions made in reviews focus on process rather than straying into merits was a common response.

Relationships

- Improving relationships built on trust and centred on engagement was a key response.
- A common reaction was the need for two-way communication, greater transparency, and continuing to ensure proper confidentiality processes are followed to build trust.
- A typical suggestion was to establish a code of practice to promote better, more informed relationships, as well as affiliations to support smaller research institutions with constrained resources.

Visibility

- ARIC could boost its visibility, according to stakeholders, as many research institutions and staff were unaware of the work it did or the influence it had on research integrity.

Timeliness

- A few stakeholders indicated there was a need for improved timeliness for the review process, in particular through addressing the lengthy back and forth in data collection and the slow response times.

ARIC members

Clearer processes

- Members of ARIC emphasised the significance of well-defined processes.
- A need for benchmarks around the timelines for reviewing applications, as well as increased transparency, was noted.
- ARIC members suggested including a method for requesting applicants and research institutions to provide feedback regarding how their application was handled and where improvements may be made.

Relationships

- ARIC members placed improving relationships high on their priority list.
- The need for two-way conversations, greater transparency, adopting a code of practice, and affiliations to support smaller research institutions with little resources were mentioned by ARIC members.
- Consolidating Secretariats was suggested by ARIC members.

Education and training

- The opportunity to provide further education and training received less attention from ARIC members than from institutional stakeholders.
- They emphasised the use of case studies and ARIC's role in raising awareness of the best practices, ethics, and rules pertaining to all facets of research integrity, similar to stakeholders of research institutions.
- The need for standardisation in research integrity education and training was a topic raised by ARIC members.

Visibility and resource intensity

- ARIC members suggested increasing ARICs visibility and reviewing resources because many of the functions were resource intensive.

Peak bodies and other entities

Clearer processes

- Data visibility, increased transparency, and thorough explanations of ARIC's findings and recommendations were some of the sub-themes.
- Reviewing current criteria for operational processes, research integrity and misconduct, and triaging cases according to the seriousness of the breach were additional sub-themes that were not raised by other stakeholders, as were introducing self-regulation and operational process audit requirements.

Education and training

- Stakeholders also responded with the need for ARIC to have a bigger educational role. Sub-themes, such as utilising case studies and a greater comprehension and promotion of research integrity best practice, supported those from agencies and institutional stakeholders.
- Some stakeholders considered that offering accredited research integrity training, ARIC might standardise knowledge levels.

Visibility

- Stakeholders stressed that many stakeholders are unaware of the purpose and role of ARIC. Agencies observed that ARIC might raise their visibility to help cultivate and create public trust.

Relationships

- Stakeholders recognised the need for better relationships by suggesting a code of practice and facilitating affiliations to support small research institutions that have little resources, similar to institutional stakeholders and ARIC members.
- Improving information sharing between Government agencies and third parties within the sector was another new sub-theme that was mentioned.

Timeliness

- Stakeholders emphasised that a lack of timeliness continues to be a problem for ARIC, similar to institutional stakeholders and ARIC members.
- Stakeholders made a point of highlighting how inadequate resources among ARIC panels and Secretariats cause lengthy response times and delays in delivering recommendations.

ARIC applicants

Clearer processes

- As was the case with other stakeholders, applicants agreed that ARIC needs clear criteria/rubrics when reviewing cases as well as well-defined processes.

Relationships

- Applicants recognised the need for better relationships as did stakeholders. A common response was the need for two-way communication and ensuring confidentiality to build trust and confidence in the ARIC review process.

Timeliness

- Applicants reported lengthy response times and delays in correspondence, providing updates and delivering recommendations.

Education and training

- Applicants also called for ARIC to play a stronger educational and training role.

Table 16. Summary of key themes (ranked by frequency of response) from stakeholder interviews – opportunities to improve or change the function of ARIC (Source: KPMG).

Rank	Research Institutions	ARIC Members & Funding Agencies	Peak Bodies & Other Entities	ARIC Applicants
1	**Education and training** • Utilising case studies • Best practice for research integrity • Building capability and knowledge uplift • Emerging issues, position and stance • Delivering information sessions	**Clearer processes** • Data visibility and breach register • Rubric scoring • Requesting feedback • Transparency and process alignment • Review timeframes	**Clearer processes** • Data visibility and transparency • Case triage • Review of criteria • Thorough explanation of findings and recommendations • Audit for process and self-regulation	**Clearer processes**
2	**Clearer processes** • Data visibility and breach register • Benchmark and rubric scoring • Consistent reporting • Thorough explanation of findings and recommendations • Decisions process versus merit reviewed	**Relationships** • Two-way conversations • Transparency • Code of practice • Consolidation of secretariats • Affiliations	**Education and training** • Utilising case studies • Accredited training • Best practice for research integrity	
3	**Relationships** • Two-way conversations • Transparency • Confidentiality • Code of practice • Affiliations	**Education and training** • Standardisation • Utilising case studies • Best practice for research integrity	**Visibility**	**Timeliness**
4	**Visibility**	**Visibility & Resource Intensity**	**Relationships** • Code of practice • Affiliations • Information sharing	**Education and training**
5	**Timeliness**		**Timeliness**	

Survey Responses

The survey included a series of statements relevant to key evaluation questions for which participants were asked to indicate their view on a scale from Strongly Agree to Strongly Disagree.

Responses from the survey of research institutions, agencies and ARIC members and applicants were sought as to whether they considered the existing research integrity arrangements in Australia to be appropriate. As shown in Figure 15, the responses indicated that 16.67 per cent of representatives from agencies disagreed, 33.33 per cent had a neutral response and 50 per cent agreed (n=6). No agency representative strongly agreed or strongly disagreed. Of applicants, 83.33 per cent strongly disagreed and 16.67 per cent had a neutral response. No applicants disagreed, agreed or strongly agreed (n=6). The responses indicated that 16.67 per cent of ARIC members strongly disagreed, 33.33 per cent had a neutral response, 33.33 per cent agreed and 16.67 per cent strongly agreed (n=6). No ARIC members disagreed. Of the 27 institution representatives who responded, 11.11 per cent strongly disagreed, 22.22 per cent disagreed, 18.52 per cent had a neutral response, 33.33 per cent agreed and 14.81 per cent strongly agreed that the existing research integrity arrangements in Australia were appropriate. Overall, all stakeholder groups except for applicants considered the existing research integrity arrangements in Australia to be appropriate. This may reflect their individual experiences or outcomes.

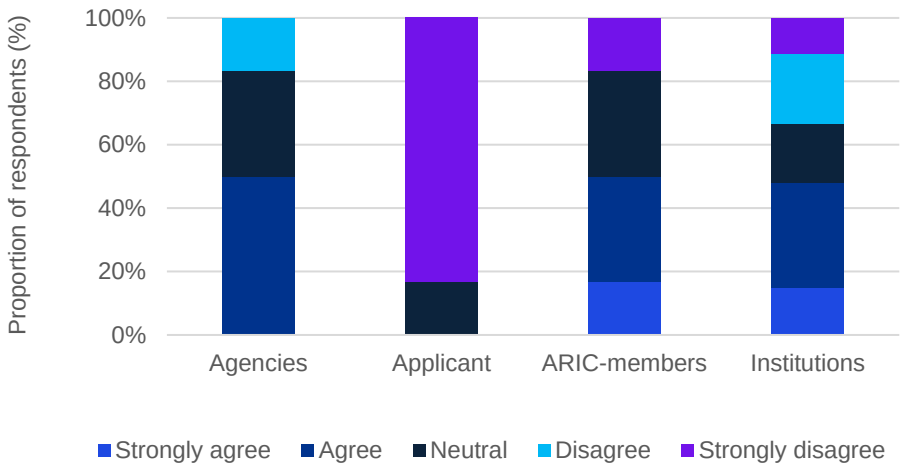


Figure 15. Survey responses about whether agencies, ARIC applicants, ARIC members and institutions considered the existing research integrity arrangements in Australia to be appropriate.

Responses from the survey of research institutions, agencies and ARIC members and applicants were sought as to whether they considered the existing research integrity arrangements in Australia to be effective. As shown in Figure 16, the responses indicated that 66.67 per cent of representatives from agencies had a neutral response and 33.33 per cent agreed (n=6). No agency representative strongly agreed, disagreed, or strongly disagreed. Of applicants, 83.33 per cent strongly disagreed and 16.67 per cent had a neutral response. No applicants disagreed, agreed or strongly agreed (n=6). The responses indicated that 16.67 per cent of ARIC members disagreed, 50 per cent had a neutral response and 33.33 per cent agreed (n=6). No ARIC members strongly disagreed or strongly agreed. Of the 27 institution representatives who responded, 11.11 per cent strongly disagreed, 14.81 per cent disagreed, 25.93 per cent had a neutral response, 29.63 per cent agreed and 18.52 per cent strongly agreed that the existing research integrity arrangements in Australia were effective. Overall, all stakeholder groups except for applicants considered the existing research integrity arrangements in Australia to be effective. This may reflect their individual experiences or outcomes.

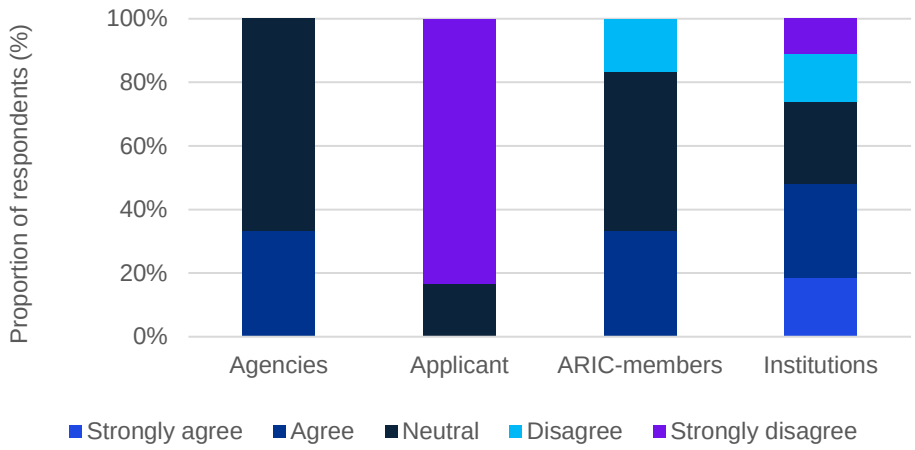


Figure 16. Survey responses about whether agencies, ARIC applicants, ARIC members and institutions considered the existing research integrity arrangements in Australia to be effective.

Open-ended survey responses

Additional optional open-ended survey responses from institution representatives, ARIC members, ARIC applicants and agency representatives were analysed qualitatively using thematic analysis.

Seven main themes identified included:

- An opportunity for education and training.
- Gaps in the Framework.
- Competence and integrity or groups.
- Collection of data to increase visibility and accountability.
- Improved functionality.
- The need for clearer processes.
- Improving transparency with the public.

Education and training

Representatives from research institutions commented on the following elements regarding education and training.

- Support for the research community in managing research integrity through promotion and education to improve broad uplift.
- Potential ARIC role in providing support and/or resources for institutions to deliver training and provide advice. This is particularly beneficial for smaller institutions that have less research output and less available resources.
- Stakeholders also called for more experience and training with respect to investigation, knowledge of procedural fairness, and research integrity management.
- Calls for promotion of best practice to encourage high-standards, national reputation, and trust.
- A body like ARIC that provides process oversight and advice on improving local policies and processes should provide more support and outreach.

- There is a role to fill in providing expert knowledge in research integrity management to institutions when needed (rather than only after review). Proactive engagement may lessen case load for both organisations.
- Advisory role to institutional offices to assist with process concerns at the time of investigation to prevent potential missteps.

ARIC members indicated:

- One ARIC member noted that there is an opportunity to use the publicly released ARIC Annual Reports to increase understanding of assessment and investigation processes.

Gaps in the Framework

Research institutions indicated the following about gaps in the Framework:

- The need to ensure the Framework was consistent so that ARIC could not go beyond its remit when making recommendations.
- Clearer categories of membership would provide clarity and assurance to stakeholders.
- Flexibility in the Framework to support institutions in managing other obligations, such as legal and regulatory obligations.

Competency and integrity

Representatives from research institutions discussed the following:

- Many stakeholders noted the high levels of integrity by those in the system, specifically those serving on investigation panels and administrators.

ARIC members commented on the following elements of competency and integrity:

- ARIC members believe the committee has a good balance of qualifications and experience which includes legal, research and management.
- One member noted that more priority should be given to the experience and capacity of prospective members to undertake an administrative review.

Visibility

ARIC members discussed the following:

- ARIC members emphasised that ARIC needs to be more visible and understood in the research sector.
- ARIC members noted that lack of awareness of ARIC in the research sector results in a limited number of requests for review.
- ARIC members believe that more resourcing would improve the visibility of ARIC to the research community.

ARIC applicants indicated the following about visibility:

- Applicants noted that there is a lack of awareness of ARIC's role and purpose in the research sector.
- Some applicants noted that ARIC's lack of visibility and awareness has resulted in under-reporting of research integrity breaches.

Functionality

ARIC members discussed the following:

- ARIC members noted that the Secretariats have reduced learning opportunities as they function as separate bodies.
- ARIC members emphasised that having two different online systems is inefficient as it is time-consuming to access required data and documents.
- ARIC members highlighted that there are not enough resources to complete the work in a timely manner.
- Some ARIC members suggested that setting target timeframes for review completion could improve organisational timeliness.
- Some members commented that ARIC should be monitoring compliance with its recommendations.
- ARIC members noted that key elements of the system, such as guides and processes, have been improving over time.

Clearer processes

Representatives from funding agencies discussed the following:

- Agencies noted that the ARIC review process was valid and confidential.

ARIC applicants commented on the following elements of clearer processes:

- An applicant noted that ARIC's criteria to accept or reject appeals are not clearly defined or explained.
- Another applicant stated that there is a lack of clarity around the roles and responsibilities of ARIC, the Secretariats, the Chair, and the CEOs of ARC/NHMRC.
- Stakeholders also requested the use of rubrics to better define criteria and expectations when conducting reviews.

Transparency

ARIC applicants indicated the following about transparency:

- Applicants highlighted that ARIC should maintain a breach register. Applicants wanted ARIC to conduct annual reporting which includes an anonymised summary of the number of complaints and how many were resolved to improve transparency with the public.

3.2.2 Discussion

Table 17. Key evaluation question 2 (sub-question 2.1), indicators and discussion reference (Source: KPMG).

Evaluation question*		Sub-question	Indicator	Discussion reference
2.0	To what extent is ARIC's contribution to Australia's broader	2.1 What (if any) are the opportunities to improve or change the	Synthesis of all project activities to describe future recommendations for the research integrity system in Australia and opportunities to improve ARIC operations.	Discussion of key evaluation question 3.2 (section 3.2).

Evaluation question*	Sub-question	Indicator	Discussion reference
	research integrity system fit-for-purpose?	function of ARIC?	

On opportunities to improve or change the function of ARIC

ARIC is fulfilling the requirements of the ARIC Framework, albeit with room for improvement in specific areas. Stakeholder feedback has raised some fundamental concerns about ARIC's role in the research integrity system which impact on its performance, particularly as these concerns can undermine confidence in ARIC and its value.

Distinguishing between process and merits

An important concept raised during the evaluation relates to the distinction between process and merits review within the context of ARIC's limited scope in conducting process reviews. In some circumstances, there was a lack of understanding of ARIC's role, which meant that expectations were not going to be met. In others, there were claims that it was hard to disentangle process issues from merits issues, resulting in requests for more information with the increased burden that causes.

It was suggested by some stakeholders that ARIC should have the authority to address the merits of a case to facilitate potential resolutions. However, such a proposition would necessitate significant operational and structural modifications within ARIC, including a reassessment of its scope and resource allocation for both the committee and the Secretariat. This change would deviate from the current research integrity arrangements in Australia, where institutions bear primary responsibility for managing and investigating research integrity matters.

To enhance clarity and avoid confusion between process and merits review, to the funding agencies should develop comprehensive guidelines and provide clear communication to stakeholders regarding ARIC's scope and limitations. By establishing well-defined boundaries and outlining the specific objectives of ARIC's process reviews, funding agencies can mitigate the challenges associated with distinguishing between process and merits issues, thereby facilitating more effective and efficient review processes.

The outcomes of ARIC reviews

Concerns have been raised by stakeholders, particularly applicants, regarding the outcomes of ARIC reviews. Dissatisfaction arises from the lack of understanding that the best possible outcome an applicant can expect from an ARIC review is for a Preliminary Assessment or Investigation to be repeated, thereby extending an already protracted process. When this became apparent to them, some applicants expressed reservations about the prospect of repeating these processes, as it may result in further delays and distance from the original concerns, potentially diminishing their satisfaction with the resolution.

Institutions also question the rationale behind repeating Preliminary Assessments or Investigations, especially when the benefits or altered outcomes resulting from such repetition are not readily apparent. This scepticism underscores the need for ARIC to provide greater clarity and transparency in its review outcomes, ensuring that they are meaningful and bring tangible value to both the institution and the applicant.

Changing the outcomes from ARIC reviews would require a major change in ARIC's purpose, which is not contemplated in this evaluation. However, implementing the recommendations above should improve stakeholders understanding of ARIC's purpose and the way it operates, so expectations can be better managed, and processes and timeframes improved so those involved in reviews don't need

to wait so long for a result. This should help make the outcomes for relevant and useful and help increase confidence in ARIC.

3.2.3 Conclusion

ARIC operates effectively within its established bounds and plays a significant role in Australia's research integrity landscape. The evaluation has identified several recommendations (recommendations 1-15 listed above) to enhance ARIC's function and operation within the current Framework. However, addressing the broader issues raised in response to Key Evaluation Question 2 would require substantial re-evaluation of ARIC's mandated role and operational framework within Australia's research integrity system.

The effectiveness of ARIC and its positive contribution to Australia's research integrity landscape can be enhanced further by the implementation of the above recommendations and commitment to ongoing improvement.

To ensure continuous improvement, there is value in conducting another evaluation in the future, approximately three-to-five years from the current assessment, should the recommended improvements be implemented. This evaluation will provide the benchmark for future evaluations assessing ARIC's performance.

Appendix A: Evaluation method

This appendix provides a brief description of the method used to conduct evaluation activities.

A.1 Stage 1: Evaluation planning and design

The 'evaluation planning and design' stage included key activities such as:

- Project initiation meeting: Between KPMG and NHMRC to confirm project objectives, scope and timeframes, agree project management protocols, determine evaluation governance arrangements and approach, and agree stakeholder engagement approach.
- Evaluation design workshop: Two-hour workshop to confirm and validate the scope and approach of the evaluation, developing a more detailed understanding of ARIC and its scope of work, consider the program logic, discuss key evaluation questions and data collection methods and the Framework.

A.1.1 Defining the key evaluation questions

Key evaluation questions were refined to guide data collection activities and ensure insights are aligned with evaluation objectives.

Key evaluation questions

Evaluation questions are the high-level questions that the activities of the evaluation are designed to answer. These, in turn, provide the information and evidence required to indicate whether the program has achieved its intended outputs and outcomes as defined in the program logic.

The key evaluation questions guide what data the evaluation will collect, how it will be analysed and how it will be reported. The answers to the evaluation questions will provide the evidence required to understand the effectiveness of implementation, outcomes achieved and will set the future direction of ARIC.

Linking the key evaluation questions to the Program Logic

The first key evaluation question and sub-questions (1.1 – 1.4) were targeted to the appropriateness, effectiveness, and outcomes of ARIC, encapsulating the components of the program logic, while the second key evaluation question (To what extent is ARIC's contribution to Australia's broader research integrity system fit-for-purpose?) was intended to synthesise learnings from across the evaluation to understand future opportunities.

Evaluation indicators

Indicators represent the specific quantitative and qualitative elements which provide the detailed data to support each of the evaluation measures. The indicators allow measurable change to be traced throughout the evaluation timeframe and thus provide specific data points for comparison.

Data sources

Data sources reflect where and how the information will be obtained to report against the indicator. This project will largely draw on qualitative data sources, reflecting on the type of information that is available and required to address the evaluation questions.

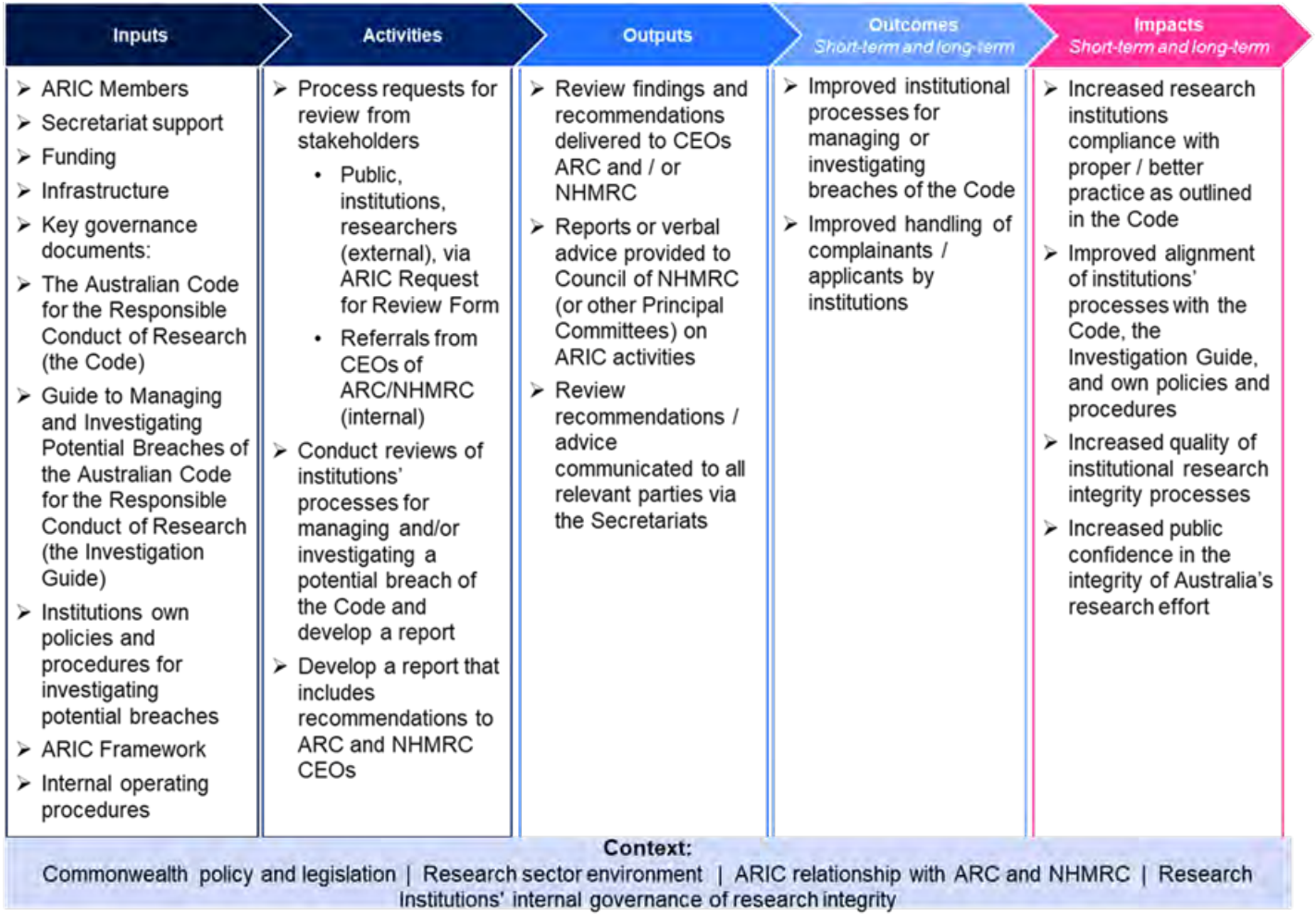
Key evaluation question indicators are linked back to the program logic model for ARIC. The evaluation data matrix set out in Table 18 links the key evaluation questions, indicators, and data sources. The discussion of results and findings in this report are linked directly back to this matrix.

Table 18: ARIC Evaluation Data matrix

	Evaluation question*	Sub question	Indicators	Data sources
KEQ 1	**To what extent is ARIC effective in meeting its purpose under the Framework?**	1.1 How effective is ARIC in conducting and managing requests for reviews?	• Number of completed reviews per year. • Number of ARIC recommendations challenged by institutions per year. • Time taken to complete reviews. • Analysis of ARIC research integrity process, including strengths and weaknesses of the ARIC review process. • Comparison of the ARIC review process to international examples (n.b: the international policy scan report provides research relating to the research integrity governance arrangements in nine countries). • Comparison of ARIC membership and the selection process to the function and role of members to the experience of international research integrity committees. • Analysis of the Secretariat purpose, function, and outputs. • Stakeholder perceptions of: - ARIC's role, profile, and function in contributing to research integrity in Australia. - ARIC's structure, member qualifications and selection process, including its current/former members. - Secretariat structure and operations (including current and former Committee member experience).	ARIC program documentation. Stakeholder consultation.
		1.2 How effective are the outputs of ARIC reviews in informing decisions by NHMRC and ARC CEOs on how research institutions have managed potential breaches of the Code?	• Comparison of ARIC recommendations and content in the final report and communications to the research institution. • NHMRC and ARC CEOs perspective of ARIC review processes and recommendations. • Extent to which NHMRC and ARC CEOs accept ARIC recommendations.	

	Evaluation question*	Sub question	Indicators	Data sources
		1.3 How effective are the outputs of ARIC reviews in informing research institutions on how they handled potential breaches of the Code?	• Comparison of ARIC recommendations and content in the final report and communications to the research institution. • Sector perspective of ARIC review processes and recommendations. • Extent to which recommendations are recognised by the institution, and where relevant, adopted.	
		1.4 To what extent is ARIC's existence and role known and understood by relevant stakeholders?	• Stakeholder perceptions of ARIC review processes and recommendations. • Extent to which institutions share information about ARIC review outcomes to relevant parties.	
KEQ 2	**To what extent is ARIC's contribution to Australia's broader research integrity system fit-for-purpose?**	2.1 What (if any) are the opportunities to improve or change the function of ARIC?	• Synthesis of all project activities to describe future recommendations for the research integrity system in Australia and opportunities to improve ARIC operations.	International policy scan. ARIC policy and program documentation. Stakeholder consultation.

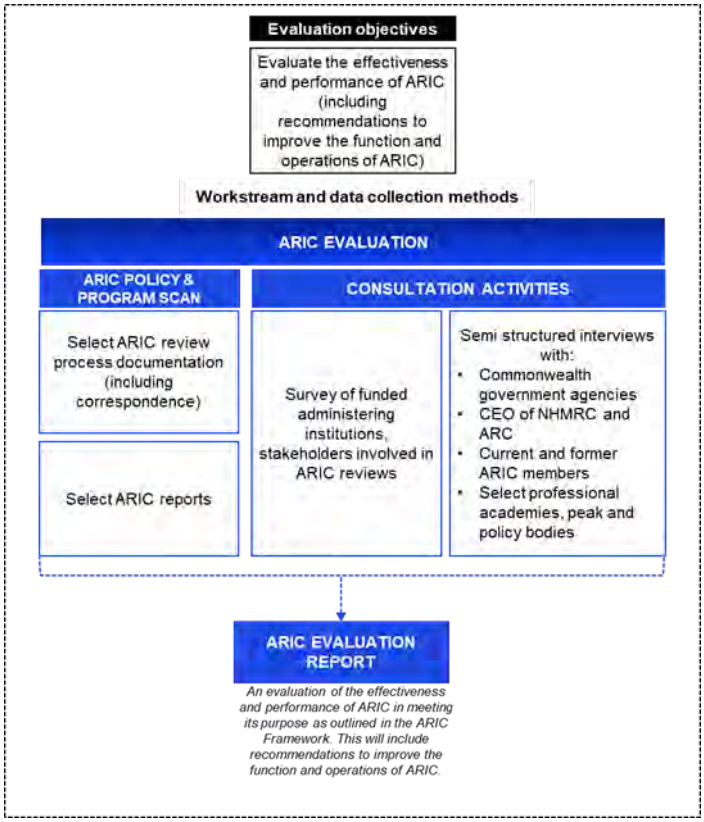
A.1.2 ARIC program logic



A.2 Stage 2: Conducting the evaluation

This stage included three concurrent streams of work: a desktop review, semi-structured interviews, and an analysis of survey data. The evaluation used three separate workstreams to capture a range of qualitative and quantitative data which were then synthesised to create a final evaluation report.

The key inputs and deliverables for each stream are summarised in the diagram below, which are expanded on in more detail in the subsequent sections.



A.2.1 Case Review

The case review methodology worked to map what was occurring in ARIC reviews to elements of adherence to the Framework and Operating Procedures. Select documentation was provided by the ARC and NHMRC across nine ARIC review cases. KPMG provided the following criteria to guide case review sampling:

- A total of 10 previous ARIC NHMRC and ARC review reports and all Secretariat documentation from 2018 – 2022 (five reviews from NHMRC-ARIC and ARC-ARIC Secretariats respectively).
- Reviews selected include a variety of research institutions involved, subject matter and level of complexity.
- ARIC review reports and recommendations that have been implemented, and those where recommendations have not been taken up by the research institution.

ARC and NHMRC were responsible for selecting the cases for KPMG to review and providing the relevant documentation to inform the case review process. A list of all documents relating to each case is provided in Appendix B.

"Key Considerations" were lifted about the way ARIC functions from the Framework and Operating Procedures which were used to track detailed observations. Each of the Key Considerations is listed below:

Key Consideration
Determining matters to be considered by NHMRC-ARIC or ARC-ARIC.
Role of the Secretariat.
Grounds for review.
Requests for review.
Convening a review panel (including managing conflicts of interest).
Requests for information.
Procedural fairness and draft reports.
Privacy.
Draft and Final Report.
Recommendations and outcomes.
Final outcome communicated from the funding agency CEO.
Correspondence with the research institution.

A.2.2 Elements of success were identified against each key consideration

Elements of each consideration as defined by the Framework and Operating Procedures were identified and are listed in Table 19 below. The content of these may be seen as the core components that ARIC seeks to meet throughout a review.

Table 19: ARIC key considerations and essential elements that define success (derived from the Framework.)

1. Determining matters to be considered by NHMRC-ARIC or ARC-ARIC.
The research in question was funded by one of the funding agencies.
The complaint relates to research that was conducted at or under the auspices of an institution that receives research funding under either the *National Health and Medical Research Council Act 1992*, the *Australian Research Integrity Council Act* or any other relevant research grant.
2. Request for review (application).
The Request for Review form was made via the online ARIC Request for Review form.
The Secretariat has determined whether the request provides all the information necessary to meet the formal requirements for review.
The request for review was made within 12 weeks following formal notification from an institution that it has finalised its preliminary assessment or investigation into the potential breach of the Code.
The Secretariat has written to the applicant within one week of receiving the application acknowledging receipt of their application.
Where a request for review alleges institutional delay and/or inaction, ARIC will notify the institution that a request for ARIC review has been received.
The Secretariat has written to the applicant within six weeks of receiving the application, to provide an update of their review, seek additional information, or inform them that ARIC has determined to not proceed with the review.
Acceptance of the request for review by the ARIC Chair.
Decision to accept a request for review made outside of the 12-week timeframe is justified by the Chair.
3. Grounds for review.
Evidence that the institution's processes allegedly involved a breach of procedural fairness were carried out in an untimely manner or did not follow defined processes.
The institutional processes have been completed, or otherwise listed exceptions have been identified and documented by the Chair.

There is documentation of the reasons to accept (or reject) a request for review and how the grounds for the review have been established.
4. Convening a review panel (including managing conflicts of interest).
The decision to convene a review panel has been documented.
The review panel convened comprises of three or more ARIC members.
The review panel knowledge, skills and experience are relevant for the subject matter of the review case.
Conflicts of interest are declared and managed by the Chair.
5. Requests for information.
Secretariat requests for information are communicated in a timely manner.
The information requested is provided by the research institution within the proposed timeframes suggested by the Secretariat.
Information requested is in scope for the procedural issues raised, and proportional to the subject matter and complexity of the review case.
Secretariat correspondence provides appropriate detail about the information requested to the institution (e.g., context, reason the information is being requested, relevance to the review case and any procedural issues raised).
6. Procedural fairness and draft reports.
ARIC has provided the institution with a copy of the draft report and an opportunity to respond to correct any factual errors.
The applicant may also be provided with the draft report, relevant parts of the report or a summary, to ensure that the facts and issues of the matter have been accurately represented.
Procedural fairness was extended to the relevant parties throughout the ARIC review process.
7. Privacy.
The ARIC Secretariat of the relevant funding agency will manage personal information received in accordance with the *Privacy Act 1988* and take reasonable steps to protect information from misuse and loss, and from unauthorised access, modification, and disclosure.
8. Draft and Final Report.
There is evidence (for matters after 1 July 2019) that the Investigation Guide has been used as the benchmark for reviewing how an institution funded by the ARC or NHMRC has managed a potential breach of the Code.
There is evidence that the institutional responsibilities in the Code, in particular R9 - R13, and any other aspect of the Investigation Guide as identified by the Panel have been assessed and addressed in the review findings and outcomes.
There is evidence ARIC has assessed the extent to which an institution's investigation has incorporated the principles of procedural fairness set out in Section 3 of the Framework.
The final report: (a) describes the nature of the potential breach of the Code and the complaint relating to the institution's preliminary assessment or investigation into the potential breach of the Code; (b) identifies the institutional policies and procedures under which the preliminary assessment and/or investigation was conducted; (c) identifies and summarises any records and evidence relied on to reach its findings and, where relevant, recommendations; (d) provides an opinion on all complaints about the institution's handling of the preliminary assessment and/or investigation into the potential breach of the Code, including reasons for the findings; (e) where appropriate, provides recommendations based on the findings and a consideration of the proportionality of any recommendations; (f) considers and includes any relevant comments made by the parties in response to the draft report, and

(g) makes a recommendation to the relevant CEO on who should be provided with a copy of the final report or a summary of the report.
9. Recommendations and outcomes.
The advice or recommendations in the draft report result in general or specific advice relating to the identified procedural issues by the applicant.
The advice or recommendations may include: • Advice on improvements an institution could or should make to manage or investigate potential breaches of the Code in the future. • That an institution should offer an apology to the complainant or the applicant that an independent individual or individuals should be engaged by an institution to provide an independent review of the merits of any finding of a breach of the Code, or; • that an institution should conduct a new preliminary assessment or investigation.
The proposed review outcomes communicated to the CEO are proportional, having regard to the nature of the complaint and the community's trust in research integrity.
10. Final outcome communicated from the funding agency CEO.
Evidence that the relevant CEO takes into account advice from ARIC as well as other relevant factors.
The final advice and outcomes are consistent with the advice communicated from the ARIC review.
The research institution accepts the final recommendations of the review.
The research institution provides a summary of actions in communications regarding proposed steps to implement the recommendations.
11. Correspondence with the research institution.
The research institution engages with the Secretariat and panel throughout the review process.
The research institution provides requested information and documentation within appropriate timeframes as specified by the Secretariat.
The research institution provides feedback into the draft report.

A.2.3 Documentation of individual case findings and scoring

Information provided against each case was reviewed for evidence of the above listed essential elements. Findings statements were provided for each element, recording the extent to which this element was met, and identify gaps. A score was provided against each key consideration, providing an assessment of the extent to which fidelity to the Framework and Operating Procedures were achieved. The scores were:

	ARIC processes are reasonably compliant with the Framework.
	ARIC processes are compliant with the Framework, with some opportunities to improve.
	Not applicable.

A rating of "Not applicable" was provided where a score could not be reasonably given against the key element for the following reasons:

- The case provided for review was in-progress, or the request for review was not accepted. In these instances, the review could not provide an assessment against considerations in the review process that had not been reached.
- The documentation provided by ARC or NHMRC did not provide information to assess the key consideration.

A.2.4 Documentation of summary findings and scoring

The trend of each score provided against each key consideration formed the summary score provided in Table 8. Findings against each key consideration were provided based on an analysis of all cases reviewed, results looked for:

- Trends across the nine reviewed cases.
- Gaps that were identified.
- Outlier results were commented on.

A.2.5 Semi structured interviews

KPMG conducted 43 interviews between December 2022 – February 2023 with a select group of stakeholders including representatives from: research institutions, peak bodies, Commonwealth Government departments, current and former ARIC members, applicants and select professional agencies.

The semi-structured interviews were undertaken by at least two team members from KPMG. At least one facilitator, and a data collector. One interview was conducted in-person, and the remaining were held over Microsoft Teams, and took approximately 30 minutes to one hour to complete. Interview transcripts were captured electronically by KPMG.

Prior to each interview a consultation guide was provided to each interview participant. The consultation guide provided a summary of the following information relating to the evaluation of ARIC:

- Purpose of the project.
- Consultation approach.
- Consent.
- Participant privacy and confidentiality.
- Data collection, storage, and privacy.
- Evaluation project background.
- Consultation topics of focus.
- KPMG contact information.

Appendix F includes an example of the consultation guide. All consultation materials, including interviewer questions, interviewee questions were reviewed, and approved by ARC and NHMRC. The list of proposed individuals to be interviewed by KPMG was provided by NHMRC.

A.2.6 Evaluation of ARIC survey

A third data collection activity to inform the evaluation was a survey. The survey was aimed to explore views on: The extent to which ARIC is effective in meeting its purpose under the Framework and the extent to which ARIC's contribution to Australia's broader research integrity system is fit-for-purpose.

Questions were developed by KPMG, reviewed, and approved by ARC and NHMRC prior to release, and included a combination of likert-scale and free-text response options. Conditional formatting was applied to each stakeholder group, ensuring each stakeholder response group received the appropriate set of questions.

The survey was released on the platform Forsta, on Monday 13 February 2023, and closed on Sunday 26 February 2023. One reminder email was sent to stakeholders on Monday 20 February 2023. The distribution list for the survey was provided by ARC and NHMRC and included 269 email addresses. Stakeholders included representatives from: the Funding Agencies, Commonwealth Government

departments, non-government organisations, universities, peak and professional bodies, research institutions, hospitals, and health services.

A total of 54 completed survey responses were received. The table below provides a count of responses per respondent group (as identified in the survey). Five blank or incomplete entries were excluded from the final survey analysis and from the table. These entries did not progress past the first question.

Respondent category	Count
Academies, peak bodies and Government agencies (I have not been involved in an ARIC matter and am not a representative of an NHMRC and/or ARC funded institution).	9
Applicant involved in an ARIC review.	7
Current and former ARIC members.	4
Research Institution (I am responding on behalf of or from the perspective of an NHMRC or ARC funded research institution).	34
Total.	54

A.2.7 Data analysis

Qualitative data analysis

All semi structured interviews were transcribed capturing key discussion points under each question posed into Microsoft OneNote. The transcripts were translated into Microsoft Word line by line for thematic analysis by three KPMG staff members familiar with the evaluation. Free text survey responses were exported from the survey platform Forsta, into a Microsoft Excel spreadsheet, and copied line by line into Microsoft Word. Thematic analysis was completed on every line of interview feedback, and free-text survey responses. There are five steps in conducting thematic analysis:

- Familiarisation with the data to gain an overall picture of the consultations.
- Code and identify themes. This involves recording or identifying similar, repeated content or patterns in the data that are interesting and provide insight into the KEQs. Patterns are summarised and interpreted, then coded to develop an organised plan of thematic insights.
- Review, modify, and test themes to ensure they are mutually exclusive and collectively exhaustive and test relevant, emerging insights with key stakeholders in further consultations, to modify iteratively.
- Define themes to determine the scope, focus, and relationships between each theme, and identify key insights and findings from the consultations.
- Rank themes in each key evaluation question and sub-question relating to the frequency of stakeholder response.

All themes identified were included in the results. Themes were derived against each stakeholder group, for each key evaluation question and sub-question. A summary diagram was prepared for each key evaluation question and sub-question for the semi-structured interview themes, illustrating the themes derived from the semi-structured interviews across each stakeholder group and the ranking of that theme (based on frequency of responses).

Quantitative data analysis

The survey was a 20-item scale that gauged views to the key evaluation questions. On a 5-point Likert-like scale, participants' levels of agreement ranged from strongly disagree to strongly agree. Each question's response distribution was shown as a percentage of respondents from each stakeholder group that was represented. A list of the survey questions is provided in Appendix C.

A.3 Stage 3: Reporting

The ‘reporting’ stage consolidates the observations and considerations synthesised in Stage 2. The draft preliminary findings and considerations were presented to the NHMRC for feedback. This draft evaluation report was then developed, informed by feedback from the NHMRC, and will be followed by a final evaluation report.

A.4 Evaluation considerations and limitations

This evaluation was focused on the context, effectiveness, and outcomes of the ARIC. KPMG was provided with data and documentation to help inform this evaluation; this was not validated or assessed for completeness or appropriateness prior to analysis. KPMG was not responsible for the completeness, accuracy or reliability of the information provided by ARC and NHMRC, and used as the basis for the evaluation.

ARC and NHMRC provided details of stakeholders to KPMG. Stakeholder categories included: academics, peak bodies and Government agencies, applicants involved in an ARIC review, current and former ARIC members and research institutions. A range of stakeholder views have been detailed throughout this evaluation report, consistent with the breadth of the Australian research sector. Confidence in how representative the views are of the sector should be tempered because of the relatively small number of stakeholders who were engaged directly.

Whilst the survey was administered to a distribution list of approximately 270 potential responders, only 59 responses were received. KPMG attempted to increase survey response rates through sending one reminder email to the respondent distribution list.

Appendix B: Documents provided by ARC and NHMRC

Document type	Title
Report.	ARIC Annual Report to the Sector 2021 – 2022.
Report Attachment.	ARIC case studies to be included in the ARIC Annual Report to the Sector 2021 – 2022.
Report Attachment.	Additional case review data 2021 – 2022.
Report.	ARIC Annual Report to the Sector 2020-21.
Meeting Minutes.	ARIC AGM minutes November 2022.
Meeting Minutes.	Agenda and papers – ARIC AGM November 2022.
Document.	ARIC Request for Review form.
Operating Procedures.	ARIC Operating Procedures 2021 (NHMRC).
Operating Procedures.	ARIC Standard Operating Procedures (ARC).
Contextual information.	The Australian Research Integrity Committee Framework 2021.
Contextual information.	The Australian Code for the Responsible Conduct of Research 2018.
Contextual information.	Guide to Managing and Investigating Potential Breaches of the Australian Code for the Responsible Conduct of Research 2018.
Operating Procedures.	Confidentiality deed poll – individual (ARC).
Operating Procedures.	Confidentiality deed poll – institution (ARC).
Contextual Information.	Fortnightly update to ARIC Chair (prepared by the Secretariat). Ten updates provided, for: January 2022, February 2022 (11 February 2022, 25 February 2022), March 2022, July 2022, August 2022 (01 August 2022, 15 August 2022, 31 August 2022), September 2022.
Contextual Information.	Fraud in Scientific research – birth of the Concordat to uphold research integrity in the United Kingdom[11].
Contextual Information.	Coping with scientific misconduct[12].
Contextual Information.	The pressure to fudge medical research findings [13].
Contextual Information.	Australian Academy of Science – An Australian System for Investigating Research Misconduct – Proposal –February 2022.
Contextual Information.	Australian Academy of Science – An Australian System for Investigating Research Misconduct – Questions and Answers - February 2022.
NHMRC-ARIC case.	NHMRC-ARIC case A.
NHMRC-ARIC case.	NHMRC-ARIC case B.
NHMRC-ARIC case.	NHMRC-ARIC case C.
NHMRC-ARIC case.	NHMRC-ARIC case D.
ARC-ARIC case.	ARC-ARIC case E.
ARC-ARIC case.	ARC-ARIC case F.
ARC-ARIC case.	ARC-ARIC case G.

[11] Khajuria A, Agha R. Fraud in scientific research - birth of the Concordat to uphold research integrity in the United Kingdom. J R Soc Med. 2014 Feb;107(2):61-5. doi: 10.1177/0141076813511452. Epub 2013 Nov 21. PMID: 24262890; PMCID: PMC3914431.

[12] Wager E. Coping with scientific misconduct. BMJ 2011; 343: d6586 doi:10.1136/bmjd6586

[13] Scott, S. The pressure to fudge medical research findings. ABC News. 2013. Available from: https://www.abc.net.au/news/2013-10-25/scott-selling-science/5043620

Document type	Title
ARC-ARIC case.	ARC-ARIC case H.
ARC-ARIC case.	ARC-ARIC case I.

Appendix C: Detailed ARIC case review findings

C.1 Determining matters to be considered by NHMRC-ARIC and/or ARC-ARIC

This relates to "what can ARIC review" within Section 2 of the Framework. ARIC can accept requests for review from any institution that is eligible to receive NHMRC or ARC funding and does not require that the matter relates directly to NHMRC or ARC funded research. Subsequently, the corresponding Secretariat was allocated the ARIC request for review to determine if it met the other requirements to be eligible for an ARIC review. There were no instances where the applicant or Request for Review form proactively identified this information. This may be an opportunity to assist the Secretariat in allocating cases across the ARC and/or NHMRC in the future. Overall, it was determined that there was reasonable compliance with the Framework.

C.2 Request for review

The standard online Request for Review form was used by applicants in all but one of the nine cases. The Chair did not require this applicant to use the standard online form and the Secretariat left comments on the written request identifying the grounds for review. This was the only instance where the ARIC Chair rejected a request and the case review observed there was limited documentation of how the Secretariat and Chair reached this decision except for by communicating this rejection to the applicant. Other than this one case, there was limited documentation by the Secretariat to determine that applicants had satisfied the formal requirements for review.

The Chair exercised their discretion to accept three reviews that applicants submitted outside of the 12-week timeframe following formal notification of an investigation's outcome from an institution. In one case, the Chair accepted the request citing extenuating circumstances. The Chair exercised their discretion in another case where a request was submitted outside the 12-week timeframe by three days, taking into consideration the complexity of the complaint and that several requests were made over an extended period. However, in this case (and one other), the Secretariat did not respond within the six-week timeframe specified in the Framework and did not provide reasons for not fulfilling this requirement. Failures to respond to requests within the timeframes specified by the Framework have flow-on impacts for timeliness and procedural fairness which may need to be managed throughout the review process.

C.3 Grounds for review

This relates to whether the requests for review fall within the scope of ARIC, which only conducts reviews of the institutional processes used to manage and investigate potential breaches of the Code.

Grounds for review are clearly established across all sample cases that were accepted for review by the Chair, with applicants for accepted reviews having detailed the grounds for review. One request was rejected in its entirety as the overall complaint related to the merits of the research concerned and was thus outside the scope for review. In another case, while it was accepted, there were aspects of the complaint which were outside the scope of an ARIC review. This was communicated to the applicant, and it was specified in the report that these aspects of the complaint did not form part of the review as they did not relate to the institutional processes undertaken to conduct the initial assessment.

C.4 Convening a review panel

The sample cases considered documentation of the decision to convene a panel, panel composition and management of conflicts of interest. ARIC panel meetings provide a recurring opportunity for panel members to reflect on and declare any new conflicts of interest which are recorded in the minutes. There was no observation of a material interest declared across the case reviews which required ARIC to consider whether a member should remain involved in the review. The Framework stipulates that the Chair will convene a panel of usually three or more members, drawn from the members of ARIC. All cases reviewed involved the ARIC Chair, and at least three panel members, fulfilling requirements of the Framework.

Across all cases, the ARIC Chair sought declarations of interest from members of the panel at the commencement of its review and at subsequent meetings. Disclosure of conflict of interest is a standing agenda item - disclosure and

management of interests are handled in a standardised manner across all NHMRC ARIC reviews. Members are advised to:

- Advise of any new interests.
- Determine whether there are any 'material interests' and/or conflicts of interest with the matters under discussion
- Advise on any management strategies for members' conflicts of interest (if required).

A conflict of interest was declared in one case; in this instance, the panel member identified the potential conflict, it was discussed at a panel meeting and an outcome decided by the Chair. It appeared that conflicts of interest have been managed appropriately according to the Framework.

C.5 Requests for information

Across all cases, it was noted that the Secretariats provide correspondence to applicants within appropriate timeframes, which assists in progressing review processes and maximising opportunities for relevant parties to engage with the review. Where the Secretariats sought additional information from relevant parties (usually the relevant research institution), the following findings were noted:

- Questions requesting information vary in detail across the email correspondence sighted. Some questions create a direct link to the institution's policy/procedure or reference the Code and/or Guide. The questions do not provide guidance to the party relating to the type of documentation required to address the questions posed.
- There is limited explanation on the purpose of this additional information, how this data will be used to inform the ARIC review process or how confidentiality will be maintained.
- The responses from the institution ranged from two weeks to one month in providing the requested information.

C.6 Procedural fairness and draft reports

The evaluation considered procedural fairness in terms of ARIC's timeliness, transparency, and opportunities for institution and applicant feedback, usually centred on feedback to the draft report.

ARIC consistently extended procedural fairness to institutions which were notified of reviews and extended the opportunity to respond to the draft report in all cases where a draft report was developed. In one case, this ensured that the institution could clarify its earlier correspondence so that its procedure was accurately represented in the final report. Similarly, in another case, the institution challenged one of the recommendations in the draft report which was subsequently amended to support implementation by the institution.

There were two instances where the applicant did not sign a confidentiality deed poll. Subsequently, the first draft report was not provided to the applicant at the request of the institution to protect sensitive information. In similar future cases, ARIC could attempt to identify alternatives – such as redacting sensitive information – to ensure procedural fairness for applicants.

C.6.1 Review timeframes

Inconsistencies in the general timeliness of reviews and delays to timeframes stipulated in the Framework may impact procedural fairness throughout the review process. While there were no significant delays to the process beyond the already identified instances where ARIC did not respond to requests for review within six weeks, there are several factors that impacted timeframes in the reviews. These included subsequent requests for information, extensions granted and where there were significant feedback or amendments to the draft report.

C.7 Privacy

This relates to how well the ARIC Secretariat met its obligations under the *Privacy Act 1988* to safeguard the personal data that it receives and handles during a review, and how it protected this data from misuse and loss, and unauthorised access, modification, and disclosure.

All nine sample cases required confidentiality deed polls to be signed by the applicant and institution prior to the distribution of review findings. In some cases, certain parties may have refused to sign a confidentiality deed. In the matter where this occurred, the draft report was not shared with those individuals. Similarly, the applicant for one case requested the report be shared with two individuals who had an interest in the outcome, which was agreed by the CEO at the recommendation of the panel - on the condition that those individuals sign confidentiality deeds.

Where an applicant requests to remain anonymous to the institution, ARIC will grant that request and refrain from naming the applicant in all correspondence to the institution, including the reports. In one case, the institution pushed back on maintaining the anonymity of the applicant citing concerns about potentially sensitive institution information being sent to an unknown party; however, ARIC recognised that compromising anonymity would be a breach of *Privacy Act* obligations and provided draft reports to the institution prior to the applicant to alleviate the institution's concerns.

In one of the cases, the initial request for information sent to the institution from ARIC highlighted that ARIC would accept documents where unnecessary personal information was redacted and emphasised that none of the documents provided would be shared with the applicant.

C.8 Draft and final report

The draft and final reports were documented consistently across the cases; the procedural concerns identified at the beginning of the review process were individually addressed within the draft and final reports. Generally, there was a logical flow to how ARIC developed reports and no notable observations of inconsistency based on the key review documents. The reports evaluated support the reader to understand the background to matters and facts, address procedural issues raised (in the summaries) and develop findings that are directly relevant to the matter and scope of the review.

C.9 Recommendations and outcomes

The case review undertaken as part of this evaluation process assessed whether recommendations were conducive to outcomes that improve alignment with the Code (or Investigation Guide) and were relevant to the institution with respect to the matter. Accordingly, the evaluation focused on the feedback or challenges from institutions to recommendations that indicated the institution was unlikely to implement the recommendation. Changes to recommendations by ARIC, between the draft report and the final report, were observed in two cases where recommendations were amended in response to information provided by the institution. These changes were clearly documented and referenced in the final report in a manner that demonstrated the institution's inputs shaped the recommendations.

In terms of improving adherence to the Code, the Investigation Guide was only referenced by recommendations in two of the six cases which developed recommendations. Articulating how recommendations contribute to closer adherence with the Investigation Guide – and subsequently the Code – could be a quick way for ARIC to increase recommendations' relevance and implementation value for institutions. Similarly, the reports observed did not rigorously consider the proportionality of recommendations as is required by the Framework. Reports did not make assessments to balance the importance of ensuring adherence to the Code with countervailing priorities such as the costs for institutions, as well as the scale of institution breaches or deviations from defined processes.

C.10 Final outcome communicated from the funding agency CEO

ARIC reviews are finalised by the communication of the final report to institutions by the relevant funding agency CEO. This occurred in six cases observed where the ARIC panel developed a final report. However, only half of these cases included steps that an institution would take to implement the recommendations communicated by the funding agency CEO. This indicates that there may be some limitations to the appropriateness of recommendations provided to the funding agency CEOs by ARIC panels, impacting the likelihood of implementation.

C.11 Summary of ARIC Activity

C.11.1 The structure and administration of ARIC

The ARIC Secretariat comprise staff members from both funding agencies. The Secretariat role works independently within both funding agencies. Table 20 below sets out elements of the ARIC operating procedures, and how these are operationalised across the two funding agencies.

To improve the efficiency of the joint administration, quality improvement activities have been undertaken by the Secretariats, to create consistency amongst the documentation and reporting templates that are used across both funding agencies. Initiatives to harmonise business practices across the funding agencies were identified in 2022 and included using a single portal for the dissemination of meeting papers, panel reports and other relevant documents. It was not clear from the documentation sighted how these initiatives have progressed or the extent to which they have been implemented.

Table 20. A comparison of ARIC operating procedures across the two funding agencies (Source: KPMG analysis of ARC and NHMRC provided documentation)

ARIC Operating procedures	ARC	NHMRC
ARIC information on websites There are slight discrepancies between the two funding agencies' website sections on ARIC.	There is no additional information on the responsibilities for various bodies in the Australian research sector.	The NHMRC website states: "Information on the responsibilities for aspects of research integrity held by various bodies in Australia can be found at Research integrity in Australia – roles and responsibilities".
Documentation of Secretariat Processes. There are discrepancies in the documentation, information, and templates of the two funding agencies pertaining to ARIC reviews.	*Example documentation:* **ARIC Standard Operating Procedures:** provides an overview of the structure and processes of ARIC and ARIC reviews for the ARC Secretariat. **Draft Reports to CEO:** Five key sections include background and ARIC processes, summary of the institutions processes in response to the complaint, assessment of the institutions processes, conclusions and recommendations to the CEO.	*Example documentation:* **ARIC Standard Operating Procedures:** provides an overview of the structure and processes of ARIC and ARIC reviews for the NHMRC Secretariat. **NHMRC-ARIC Members' Handbook (2017-2019):** provides an overview of the legislation, structure, processes, and role of the entire NHMRC. **Draft Reports to CEO:** Seven key sections include introduction, background, request for review, the review by ARIC, ARIC's findings, conclusions and recommendations and appendices.
Request for Review form.	This form and process is consistent across both funding agencies.	
Fortnightly update for ARIC Chair.	Every fortnight, the ARC and NHMRC Secretariats update a list of the current reviews including their status and send it to the Chair. The current process is for the ARC Secretariat to update its part of the list and then email the document to NHMRC for them to send to the Chair and ARIC members.	
Remuneration of Members. Different remuneration processes are followed by	Members are remunerated in accordance with their contracts with the ARC.	Members are remunerated in accordance with Remuneration Tribunal (Remuneration and Allowances for Holders of Part-time Public Office)

ARIC Operating procedures	ARC	NHMRC
the two funding agencies for ARIC Members.	The ARC Secretariat created a unique administrative arrangements document to ensure remunerations align with the NHMRC.[14]	Determination. Members also receive superannuation.[15]
Timesheets and meeting records. Different processes are followed by the funding agencies regarding how they track the hours worked by ARIC members.	The Finance Master document is a spreadsheet that lists the hours members have worked and is used to calculate the amount each Member is paid.[16]	A daily fee is applicable to members for their attendance at formal meetings, preparation time required for these meetings and NHMRC-authorised travel. Payments can only be made where the time spent is one hour or more and does not include preparation time for meetings. The maximum payment for a day of work is one daily fee. Records and/or claims for payment can only be authorised by the Chair or a presiding officer.[17]
Records management tools Both funding agencies share the various documentation provided in the 'requests for review' with the ARIC panels. Two different records management tools are used by the two funding agencies.	The ARC Secretariat uses govTeams, which is a Sharepoint system run by the Department of Finance.	The NHMRC Secretariat uses Committee Centre, which is a bespoke system run by the NHMRC.
Records management file architecture.	The ARC has a filing and management system for all records.	NHMRC has a secure and limited access site in the NHMRC SharePoint environment for all ARIC matters, filed with a common file structure under the appropriate ARIC case number.

[14] Taken from the ARC-ARIC Standard Operating Procedures page 10
[15] Taken from the ARC-ARIC Standard Operating Procedures page 10
[16] Taken from the ARC-ARIC Standard Operating Procedures page 8
[17] Taken from NHMRC-ARIC Members' Handbook 2017 – 2019 page 14

Appendix D: Index of semi structured interviews

This appendix provides a list of all interviews and workshops conducted with stakeholders consulted to inform this evaluation.

Stakeholder group	Number of consultations held
ARIC Chair.	1
ARIC members (including previous ARIC members).	7
NHMRC Personnel.	2
ARC Personnel.	2
Complainants.	5
Government and peak bodies.	3
Heads of Administering Institutions (Non-Universities).	3
Deputy Vice-Chancellors (Researcher) of Administering Institutions (Universities).	11
RIOs of Administering Institutions.	4

Appendix E: Survey questions

Question	Research Institutions currently and/or previously involved in an ARIC matter	Research institutions never been involved in an ARIC matter	Academies, peak bodies, and government agencies	Applicants previously involved in ARIC reviews	Current and former ARIC members
Respondent details (mandatory questions).					
Are you responding to this survey on behalf of an organisation or as an individual? (Responses: Organisation; Individual).	X	X	X	X	X
Which of the following best describes you (or the organisation you are representing)? **Research Institution (Individuals responding on behalf of or from the perspective of an NHMRC or ARC funded research institution, such as university administration, senior management, research integrity officers and others).** **Academies and peak bodies and Government agencies (this will include respondents that have not been involved in an ARIC matter and are not an NHMRC and/or ARC funded institution, including government agencies).** **Applicants involved in ARIC reviews (this will include applicants who have previously been involved in an ARIC review).** **Current and former ARIC members.**	X	X	X	X	X
Have you been involved in an ARIC Review?	X	X	X	X	

Question	Research Institutions currently and/or previously involved in an ARIC matter	Research institutions never been involved in an ARIC matter	Academies, peak bodies, and government agencies	Applicants previously involved in ARIC reviews	Current and former ARIC members
ARIC function.					
In the current environment, I consider ARICs scope to be clearly defined (see Section 1 p.4 of the Framework).	X	X	X	X	X
In the current environment, I consider ARICs scope to be relevant and appropriate.	X	X	X	X	X
In the current environment, ARIC acts within its scope and function as described in the Framework.	X	X	X	X	X
What do you consider to be the strengths of ARIC in conducting independent reviews of processes used by an institution in the management or investigation of a potential breach of the Code?	X	X	X	X	X
Do you have anything else you would like to add on the scope and purpose of ARIC?	X	X	X	X	X
ARIC review process.					
The ARIC request for review process was easy to understand and straightforward to initiate.				X	

Question	Research Institutions currently and/or previously involved in an ARIC matter	Research institutions never been involved in an ARIC matter	Academies, peak bodies, and government agencies	Applicants previously involved in ARIC reviews	Current and former ARIC members
Information and documentation requirements were clearly described in the ARIC Review Form.				X	
The criteria and grounds for an ARIC review were clearly defined in the ARIC Framework	X			X	
Communication from the ARIC Secretariat throughout the review process was/is timely, relevant, and appropriately detailed.	X			X	
The information and feedback I provide into an ARIC review is reflected in the final advice communicated from the NHMRC and/or ARC.	X			X	
Do you have anything else you would like to add about the effectiveness, appropriateness and relevance of communication and materials (including draft Reports) from the ARIC Secretariat throughout the review process?	X			X	
Is there anything else you wish to add about your experience being involved in an ARIC review process? In your answer, please make it clear which part of the ARIC process you are referring to.	X			X	
ARIC operations and membership.					

Question	Research Institutions currently and/or previously involved in an ARIC matter	Research institutions never been involved in an ARIC matter	Academies, peak bodies, and government agencies	Applicants previously involved in ARIC reviews	Current and former ARIC members
The information and documentation prepared by ARIC throughout the ARIC review process are appropriate and effective.	X			X	
What are factors that help or hinder the way in which the ARIC panel and the NHMRC-ARIC and ARC-ARIC Secretariat work together?					X
Do you have any suggestions for improving the way ARIC conducts and manages requests for reviews?	X			X	X
Do you have anything else you would like to add on the appropriate qualifications, skills or experience needed to meet ARIC's functions? Should ARIC members have different qualifications?	X	X	X	X	X
ARIC recommendations and advice.					
I was satisfied with the advice and recommendations from the ARIC review, communicated from the NHMRC and/or ARC CEO.	X			X	
The ARIC review outcome sufficiently addressed my reasons for requesting an ARIC review.				X	

Question	Research Institutions currently and/or previously involved in an ARIC matter	Research institutions never been involved in an ARIC matter	Academies, peak bodies, and government agencies	Applicants previously involved in ARIC reviews	Current and former ARIC members
I consider the advice and recommendations communicated from the NHMRC and/or ARC regarding the outcome of the review to be relevant.	X			X	
I consider the advice and recommendations communicated from the NHMRC and/or ARC to be proportional to the initial complaint.	X			X	
I consider the advice and recommendations communicated from the NHMRC and/or ARC regarding the outcome of the review to be appropriate.	X			X	
The advice and recommendations communicated from the NHMRC and/or ARC regarding the outcome of the review has been acted on.	X			X	
Do you have anything else you would like to add on the appropriateness of the advice and recommendations provided to you regarding the outcome of a review?	X			X	
Do you have anything else you would like to add on the on the overall quality and relevance of the advice provided to the research institutions and other relevant parties regarding the outcome (and if relevant, any recommendations) of reviews?	X			X	

Question	Research Institutions currently and/or previously involved in an ARIC matter	Research institutions never been involved in an ARIC matter	Academies, peak bodies, and government agencies	Applicants previously involved in ARIC reviews	Current and former ARIC members
Broader research integrity issues.					
ARIC effectively contributes to public confidence in the integrity of Australia's research effort.	X	X	X	X	X
I consider the existing research integrity arrangements in Australia to be appropriate.	X	X	X	X	X
I consider the existing research integrity arrangements in Australia to be effective.	X	X	X	X	X
What do you consider to be the strengths of the current system of research integrity in Australia?	X	X	X	X	X
What do you consider the weaknesses of the current system of research integrity in Australia?	X	X	X	X	X
Do you have any other particular concerns, issues or suggestions you would like to raise regarding ARIC or the broader research integrity environment in Australia?	X	X	X	X	X
Close.					

Question	Research Institutions currently and/or previously involved in an ARIC matter	Research institutions never been involved in an ARIC matter	Academies, peak bodies, and government agencies	Applicants previously involved in ARIC reviews	Current and former ARIC members
Is there anything else you wish to comment on regarding the function, purpose, relevance or effectiveness of ARIC?	X	X	X	X	X

Appendix F: Interviewee consultation guide

F.1 Evaluation of the Australian Research Integrity Committee – Consultation Guide

F.2 Introduction

KPMG has been engaged by the National Health and Medical Research Council (NHMRC) and working closely with the Australian Research Council (ARC) to undertake an independent evaluation of the Australian Research Integrity Committee (ARIC). The objective is to assess ARIC's operations and performance and identify actionable opportunities to improve ARIC's function.

F.3 Consultation approach

Throughout this project, stakeholders in the research sector will be given the voluntary opportunity to provide their input and perspective on the effectiveness and appropriateness of ARIC's operations. Stakeholder feedback will also be gathered alternative research integrity governance models may exist that could inform the Government's responses to calls for an office of research integrity in Australia.

As part of this project, surveys and one-hour semi-structured interviews are being conducted with key stakeholders during the months of December and January 2022. The consultation topics of focus (see page 2 of this Consultation Guide) will be explored through these consultation activities. The questions posed to interviewees will follow these topics as a framework and will be adapted to individual interviewees' contexts.

Participation is voluntary, and you are free to withdraw from participating at any stage. Your choice (whether to participate or not) will not affect your relationship with the NHMRC, ARC or ARIC.

Please note: a Human Research Ethics Committee review process has not been pursued and is not the optimal pathway or required oversight level for this evaluation.[18]

- The data to inform the assessment of ARIC's operations and performance will not include identifiable, sensitive, or personal information from participants or other stakeholders.
- KPMG is committed to maintaining the highest standards of integrity in all aspects of this program evaluation project. To this end, participants' input will be anonymised, confidential and used to identify general themes to avoid any risk, burden, inconvenience, or breach of participant privacy.

F.4 Background

F.4.1 Australia's model for Research Integrity governance

Management of research integrity in Australia relies on a system of self-regulation by the research sector within a framework of national guidelines and standards developed by the Australian Research Council (ARC), the NHMRC and Universities Australia. These include the *Australian Code for the Responsible Conduct of Research* (the Code) and the *Guide to Managing and Investigating Potential Breaches of the Code* (the Investigation Guide). The Code establishes a framework and provides a foundation for high-quality research to be conducted responsibly, ethically and with integrity. It also sets out principles and responsibilities that researchers and research institutions should follow when conducting research. The Investigation Guide assists institutions to manage, investigate and resolve

[18] **For more information, please refer to: NHMRC, 2014, *Ethical considerations in quality assurance and evaluation activities*. Website link: https://www.nhmrc.gov.au/about-us/resources/ethical-considerations-quality-assurance-and-evaluation-activities .**

complaints about potential breaches of the Code. Institutions have primary responsibility for the prevention, detection, investigation, and reporting of potential breaches of the Code.

F.4.2 The Australian Research Integrity Committee

ARIC was established in February 2011, by NHMRC and ARC. ARIC is responsible for reviewing, on request, the processes used by Australian research institutions in the management and investigation of potential breaches of the Code. Through this, ARIC serves to support public confidence in research integrity processes. ARIC provides advice to the respective CEOs of NHMRC or ARC on whether a research institution's processes used to investigate a potential breach is consistent with the principles and responsibilities outlined in the Code, in line with the Investigation Guide, and with the institution's own policies and procedures. Following its review, ARIC provides advice and recommendations and, where relevant, further actions that may be required to be taken by an institution. These further actions may include process improvements, apologies to applicants, an independent review of a breach, or conducting a new investigation. ARIC's scope is to review the processes used by institutions to investigate potential breaches of the Code. ARIC is not responsible for determining whether or not a breach of the Code may have occurred or considering the merits of a matter.

F.4.3 Calls for an office of research integrity in Australia

Several countries have established offices of research integrity with various powers and abilities to undertake independent investigations. At various times, research institutions and researchers themselves have called for the establishment of an office of research integrity or independent oversight body in Australia.

F.5 Consultation topics of focus

The topics of focus that will be explored through this consultation process.

Topic	Sub topic
The extent to which ARIC is effective in meeting its purpose under the Framework.	• The effectiveness of ARIC in reviewing the processes by which institutions have conducted an integrity review. • The appropriateness and relevance of ARIC's recommendations to the NHMRC and ARC CEOs, research institutions and other stakeholders. • The extent to which ARIC's existence and role is known and understood by relevant stakeholders.
The extent to which ARIC's contribution to Australia's broader research integrity system is fit-for-purpose.	• Potential opportunities to improve or change the function of ARIC. • Stakeholder views on any issues (if any) that exist in Australia's broader research integrity system which are beyond the current scope of ARIC and are not yet addressed through existing research integrity governance and regulation mechanisms.

Data collection, storage and privacy

KPMG will keep any information we collect about you, up until you withdraw. Information provided by consultation participants will not be attributed to any individual or organisation without their express permission to do so to the NHMRC. We will keep all personal information confidential and securely stored. Australian and Australian Capital Territory privacy law gives you the right to request access to your information that the researchers have collected and stored. We will not disclose your information without your permission, except in compliance with the law. Electronic data collected or received (including survey responses, digitally captured notes, and report materials) is stored on the KPMG secure network, DocShare. Access to the dedicated project file on this network will be restricted (through the use of digital certificates) to the project team. In the event that a KPMG personal computer is lost or stolen, the firm has installed encryption software on its personal computers to prevent unauthorised access to the computer files or data. The research materials including data and results will be stored on the secure KPMG server when the report has been finished. The summary findings will be archived, and individual assessment data will be stored for 7 years then destroyed, in accordance with KPMG document retention schedules.