



# Foundation for Healthcare Innovation and Development (FHIND) - Scientific Misconduct Policy

FHIND works to improve lives in Nigeria through sustainable, evidence-based programmes that combat targeted diseases and promote health. Research is central to FHIND's work and essential to improving health and health care delivery. FHIND conducts research in a range of locations, transmission settings and health systems to develop and test new approaches and products, and learn from and improve our projects and programmes.

Maintaining high standards of research ethics and code of conduct is critical to generate quality information for decision-making. Misconduct in research encompasses several acts, which may be harmful to study participants and/or lead to the publication of misleading results. Misconduct in research is a very serious matter. The investigation of allegations of such misconduct must be conducted based on principles of balance, confidentiality, integrity, and fairness and must seek to avoid unjustified detriment to any person concerned.

The validity of research and other academic endeavour is based on the implicit assumption of honesty and integrity by the research investigator and on the explicit premise that research data are properly obtained, and are reliable and verifiable. FHIND must uphold this principle and endeavour to maintain public trust in the research process. This policy recognises the need for:

- maintaining the highest standards of rigour and integrity in all aspects of research;
- ensuring that research is conducted according to appropriate ethical, legal and professional frameworks, obligations and standards;
- supporting a research environment that is underpinned by a culture of integrity and based on good governance, best practice and support for the development of researchers;
- using transparent, robust and fair processes to deal with allegations of research misconduct should they arise;

- working to strengthen the integrity of research, and reviewing progress regularly and openly. FHIND is responsible for ensuring that the research carried out under its aegis is carried out legally, in the public interest and in accordance with best practice. This policy applies to anyone involved in research, whether as an employee of FHIND or a collaborator.

### **Submission of complaints or allegations**

There shall be a Named Person responsible for receiving all petitions related to scientific misconduct. Allegations of research misconduct must be submitted in writing to the Named Person by email and accompanied by any supporting evidence that is available to the Complainant. Any allegations of research misconduct submitted to the Named Person or Nominated Alternate will be treated confidentially. Should the Complainant prefer, they can make initial enquiries regarding their allegation of research misconduct with the Named Person anonymously. However, to take forward allegations the Complainant should make a formal written submission to the Named Person. Complaints about research may be brought by anybody concerned, not only FHIND staff.

### **Formal Investigation**

Where the Screening Panel recommends that the Procedure should progress to the Formal Investigation stage, the Named Person should take immediate steps to set up the Investigation Panel. The Named Person should inform the following that a Formal Investigation of the allegations is to take place:

- Respondent (and their representative by agreement)
- Complainant (and their representative by agreement)
- Executive Director
- Human Resources Director
- Named Person of any Partner Organisation with which either the Respondent and/or Complainant has an honorary contract, and through them the Heads of Organisation, Human Resources and Research.

The Named Person should then convene the Formal Investigation Panel. During the Formal Investigation, the Investigation Panel must interview the Respondent and Complainant in addition to any other staff (internal or external) involved in the research project. These latter interviewees should have been identified during the investigation process. The Investigation

Panel should provide a draft report of its findings to the Named Person, who should forward it to the Respondent and the Complainant for comment on the factual accuracy of the report. Only when the report contains errors of fact and matters that have bearing on the facts as indicated by the Respondent and/or the Complainant, and accepted by the Investigation Panel, should the Chair modify the report. The Chair should judge the validity of such comments and seek the agreement of the Panel before making amendments to the Panel's report. The Investigation Panel should then produce a final report. The Report should be sent to the Named Person. If all or any part of the allegations are upheld, the Named Person, the Human Resources Director and at least one other member of senior staff should then decide whether the matter should be referred to FHIND's disciplinary process or for other formal actions. The Named Person should inform the following of the conclusion of the Formal Investigation:

- The Respondent and the Complainant (and their representatives by agreement);
- The Executive Director, Chief Finance Officer, Human Resources Director and any other relevant members of staff;
- Where appropriate, the responsible person within any relevant partner organisations, funding bodies and/or regulatory or professional bodies;

The Respondent should not have the option of appealing against the reports of either stage of the Procedure. The Respondent has the statutory right of appeal should the matter be referred to their employer's disciplinary process.

### **Actions to consider**

Where the Investigation Panel concludes that the allegations are upheld in full or part, there may be a requirement to consider action in addition to any that might be recommended through FHIND's disciplinary process. The Named Person should consider the use of the recommendations set out in any case where misconduct in research has been investigated.