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To:

ALLEA President

Prof. Dr. Günter Stock

Chair, ALLEA Permanent Working Group on Science & Ethics

Prof. Dr. Göran Hermerén

Date: 06.12.2016

Subject: Stakeholder consultation for ALLEA Code of Conduct revision - Phase II

First, YEAR would like to thank ALLEA for its consultation and letting YEAR - the network of Young Researchers in Europe - have a voice in the process of the revision of the European Code of Conduct for Research Integrity (thereafter referred to as "Code"). YEAR foresees a great potential for the Code as a fundamental reference for researchers and research performing organisations.

In addition to the review of the previous version of the Code (*Phase I - sent 01.09.2016*) and the participation of YEAR delegate Alexis Sevault at the ALLEA Stakeholder Workshop on 25.11.2016 in Brussels, YEAR provides ALLEA with the present document, containing our comments and suggestions for the latest draft version of the Code. Our delegate has mentioned most of the comments below during the ALLEA Stakeholder Workshop on 25.11.2016.

General comments

- YEAR thanks ALLEA for having addressed in the new Code several of our comments sent in Phase I.
- The new version has a clear outline and the bullet list approach greatly improves the readability.

1. Introduction

- Though very informative, the introduction may be reduced to less than one page (out of the whole document consisting of seven written pages).
- Paragraph 3: the notion of environmental impact shall be added, and eventually stressed further in the rest of the document, as it is an essential aspect of today's research.
- Last paragraph, last sentence: "research and technology organisations" or "research performing organisations" shall be added to the list of mentioned targets for the Code.

2. Principles

- The paragraphs on "Honesty" and "Rigour" may be gathered to reduce the list to essential aspects.
- "Openness and accessibility" may be replaced by "Responsibility in transferring knowledge, communicating research work and provide appropriate access to data to any interested parties, including the general public, within the legal framework of intellectual properties."

3. Good Research Practices

- **3.4. Safeguards and Ethical Research:** The notion of "environmental impact" shall be stressed further, beyond the "legal provisions". It is one of the pillars of Horizon 2020 and many national research programmes.
- 3.5. Training, Supervision and Mentoring:
 - The first and third points can be gathered.
 - The notion of "Transfer of knowledge" shall not be limited only to research integrity but, as a responsible practice, shall apply to research knowledge in general. To this respect, YEAR strongly suggests adding the following point (inspired from the last point of Paragraph 2.2.3 in the previous Code): "Researchers have the responsibility to transfer research knowledge to the next generation of researchers through mentorship and supervision."

3.7. Publication and Dissemination:

- The number of items in the **list can be reduced** by removing or gathering some of the bullet points where repetition occurs, or where the level of details is too high.
- The last point on Open Access, may also include the **notion of Open Science** with reference to the European Commission book "Open Innovation, Open Science, Open to the World", in the light of the current and upcoming policy implementations on research dissemination.
- Regarding this last point, the footnote (7) currently refers to a poster instead of the Berlin Declaration itself.

4. Violations of Responsible Conduct of Research

- The content is relevant and properly exemplified.
- A reference could be made to any legal document at the European Commission level treating specific aspects of research misconduct (e.g. fabrication, falsification or plagiarism).

Terminology

- "Introduction", Paragraph 1: the word "Disciples" may be replaced by "fellows".
- In the title "3. Good Research Practices", "Good" may be replaced by "Responsible".
- "4.3 Other unacceptable and irresponsible practices": the expression "Salami-slicing" may be removed.

YEAR remains at the disposal of ALLEA if there shall be any questions about the present comments and suggestions.