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Comments from National Research Ethics Committees, Norway (NREC) on the update of the ALLEA code

With reference to the e-mail from Bethany Smith of 19 June 2026, we thank you for the invitation to contribute to the stakeholder consultation process to update the [European Code of Conduct for Research Integrity](#). The National Research Ethics Committees in Norway (NREC) has the following comments.

Overall, we concur that research integrity should not be understood primarily in terms of compliance with rules and procedures. The Code should encourage a shift from a predominantly compliance-based approach towards one that promotes reflection, responsible judgement and awareness of context.

Recent developments not adequately reflected in the 2023 CoC

We suggest that recent developments and relevant issues such as artificial intelligence, research security, responsible international collaboration, indigenous perspectives and sustainability are reflected in the Preamble, as elaborated in the following.

1) Artificial intelligence: The 2023 Code refers to artificial intelligence (AI) and expects transparency regarding the use of AI tools. However, developments since 2023 suggest that AI and its implications for research integrity could be elaborated, with a stronger emphasis on the responsible use of AI throughout the entire research process.

Recommendation:

We recommend that the Preamble more explicitly acknowledge recent developments in AI and implications for research integrity.

The definition of plagiarism in Section 3.1 does not cover text generated by AI.

Recommendation:

We recommend considering this wording which does not exclude AI-generated text: “Plagiarism means presenting research or ideas as one’s own when this is not the case.”

2) Research security: Developments since 2023 suggest that research security should be understood as an integral part of research integrity and responsible research. Research security concerns the responsibility of researchers and research institutions to identify, assess, and manage factors that may affect the independence and reliability of research, as well as its potential consequences. This builds directly on the fundamental principles of the Code. Research security should thus have a clearer and more substantive place in the Code. A revised Code should make it clear that responsible research involves assessing security risks throughout the research process. At the same time, the Code could acknowledge that research security must not become a general justification for restricting academic freedom, international collaboration, or open research. An essential part of responsible research security is therefore to conduct proportionate and evidence-based risk assessments, in which specific risks are weighed against the values of academic freedom and openness in the exchange of knowledge.

Recommendation:

We recommend that the Preamble more explicitly acknowledges the growing importance of research security as part of the changing landscape of research integrity.

3) Responsible international collaboration: Responsible international collaboration should be more clearly addressed, in a broader sense than research security alone. For example, it is not clear what responsibility researchers have to assess with whom it is responsible to collaborate.

Recommendation:

A separate bullet point on responsible international collaboration would fit naturally under section 2.6.

4) Indigenous perspectives: The 2023 Code includes some focus on equity, diversity and inclusion, but this may not be sufficient to adequately address Indigenous perspectives. In Norway, this has been highlighted through the work of the Truth and Reconciliation Commission and through the development of research ethics resources concerning the Sámi and national minorities. A revised Code could strengthen this dimension by explicitly recognising Indigenous peoples as holders of distinct rights, knowledge systems and perspectives, and by acknowledging the historical and structural conditions that may shape research involving Indigenous communities. To reflect a recurring theme in the discussions at the WCRI in Vancouver, we suggest placing greater emphasis on relationships and on the historical and cultural contexts in which research takes place. The main question should not be *“Am I allowed to do this?”* — but a broader and more reflective question: *“How can I conduct this research in a way that is respectful, responsible and fair to those affected by it, while also ensuring that the research respects the norm of truthfulness?”*

Recommendation:

Under 2.2., the Code could say that research leaders should:

“...foster a research environment characterised by respect, openness, responsibility and reflection, and consider relevant historical, cultural and societal contexts when planning and conducting research”.

5) Sustainability: It is important that sustainability and the potential consequences of research for nature and the environment are acknowledged.

Recommendations:

These considerations should be explicitly reflected in a new preamble. They could also be incorporated into Section 2.4, for example by adding an explicit reference to nature and the environment: “Researchers recognise and weigh potential harms and risks relating to their research and its applications and mitigate possible negative impacts on people, society, nature, and the environment.”

6) The responsibility of institutions and research leaders: The Code addresses both individual researchers and research institutions but provides relatively limited guidance on the responsibilities of institutions and how these responsibilities should be implemented and followed up in practice. For example, section 3.2 states that: “Investigations into research misconduct consider the role of both individuals and institutions contributing to the breach of good research practice.” This suggests that institutions may have an important role in contributing to breaches, but the Code should provide greater clarity regarding institutional responsibilities for preventing, identifying and addressing breaches of research integrity.

When assigned collectively, there is also a risk of responsibilities being diluted, for example in section 2.6 on “Collaborative Working”, which refers to “all partners”. The Code should more explicitly identify the responsibilities of those who have a particular leadership or supervisory role within a research project. Specifically, there should be greater emphasis throughout the Code on the responsibilities of Principal Investigators (PIs) and other research leaders. This is especially important in sections 2.2 and 2.6, where the responsibilities associated with planning,

managing and overseeing research activities should be more clearly attributed to those with overall responsibility for the project.

Recommendations:

- Specify the responsibilities of PIs in sections 2.2. and 2.6.
- Provide greater clarity regarding institutional responsibilities for preventing, identifying and addressing breaches of research integrity in section 3.2.

7) The responsibility of other actors in the research system: Research is increasingly undertaken through collaborations between universities, industry, public authorities and other actors. Recent WCRI work, including the Athens Statement, points to a further development of the concept of research integrity in relation to cross-sectoral collaboration. These developments could be more explicitly reflected in a revised Code, including clearer guidance on safeguarding research independence and academic freedom, managing conflicts of interest and other risks in cross-sectoral collaborations. The Code could also provide greater clarity on the scope and boundaries of research integrity, particularly in relation to research conducted across different sectors and organisational settings.

Recommendation:

Specify the responsibilities of other actors in the research system in the Preamble.

8) Publication, Dissemination and Authorship

Disagreements and conflicts concerning publication, dissemination and authorship often arise because these matters were not discussed and clarified at the beginning of and during the project. In our experience, attempting to resolve such issues later in the research process can be considerably more difficult, particularly once expectations, contributions and responsibilities have already developed and diverged. Early discussion and agreement can help prevent misunderstandings and conflicts and provide a shared framework for the project as it develops. We believe that this is a general principle that is relevant across research environments and countries. The Code should therefore encourage researchers and research leaders to establish a

common understanding of these matters from the very beginning of a project, while recognising that agreements may need to be revisited as the project evolves/progresses.

Recommendations:

Some aspects of section 2.7. could be further elaborated, particularly to emphasise the importance of addressing these matters at the outset of a research project.

First bullet point: We suggest adding an explicit reference to the timing of the discussion, for example *“at the outset”* or *“from the very beginning of the project”*.

Second bullet point: We suggest adding a similar reference to the preparation of the relevant draft/agreement, making clear that this should be developed from the beginning of the project.

9) Data ownership and handling of data and biological material: Data ownership should be explicitly addressed. Many of the same issues arise in relation to data ownership as in relation to authorship, and it is equally important to discuss data ownership at an early stage of research projects.

Recommendation:

We recommend that the provisions concerning whether, and where applicable, data and biological material are to be deleted and destroyed should be included under Section 2.5, first bullet point.

10) Whistle-blowers and protection against unfounded allegations

The Code appropriately recognises the role of whistle-blowers but should also address the need to protect researchers against unfounded or unjustified allegations.

Recommendation:

We recommend strengthening section 3.2. and include the protection against unjustified allegations.

Are the clauses clear and easy to read?

1) Some key concepts and principles could benefit from clearer definitions or explanations of how they relate to each other. ALLEA should, first and foremost, include a definition of “research integrity”, since this is what the document is primarily concerned with.

Key concepts such as research integrity and ethics are closely related, but they are not interchangeable. The Code distinguishes research integrity from broader ethical considerations but does not describe their relationship. A definition should also make clear the relationship between “research misconduct”, “violations of research integrity” and “other unacceptable practices”, cf. Part 3.

Recommendation: The revised Code could make an important contribution to strengthening a common understanding and providing greater clarity on the scope and practical implications of research integrity and related concepts.

2) It should be clear what is expected of researchers and research institutions, and what the normative status of the different provisions is. The Code currently uses different formulations, but it is not always immediately clear whether a statement represents a fundamental principle, a recommendation, a responsibility, or a specific requirement. For example, where the Code states that researchers should take certain actions, it could be useful to clarify whether this is a recommendation or an expectation that should normally be followed unless there are good reasons not to. Similarly, where the Code uses stronger language such as must or shall, this should be reserved for situations where there is a clear obligation.

3) A very large number of different groups are referred to in the document, and some of these categories overlap. ALLEA should consider shortening and clarifying the list, thereby making it easier for users of the document to navigate and understand.

4) The first bullet point of 2.7, concerning authorship, is similar to the four criteria in the Vancouver Recommendations, but the wording is not identical. ALLEA should consider whether it would be more appropriate for the criteria to be identical. In any event, it should be made

clearer in the ALLEA document that all four criteria must be fulfilled. Consideration should also be given to whether the difference between ALLEA's wording and that of the ICMJE in criterion 4 ("agreeing to be responsible" vs. "agreement to be accountable") is appropriate.

5)The penultimate bullet point of Section 2.7 should include a reference to the scope and validity of the results: "including remaining uncertainties, limitations concerning valid applications and knowledge gaps."

6)In Section 3.1, third bullet point on page 11, we suggest deleting "deliberately", as such conduct is detrimental to research regardless of whether it is deliberate.

Are there any key resources that should be added/replaced/updated?

European Commission. (2024, January 24). *Proposal for a Council Recommendation on enhancing research security*. European Commission.

European Commission, Directorate-General for Research and Innovation. (2026). *Living guidelines on the responsible use of generative AI in research* (3rd version).

OECD (2022), "Integrity and security in the global research ecosystem", *OECD Science, Technology and Industry Policy Papers*, No. 130, OECD Publishing, Paris, <https://doi.org/10.1787/1c416f43-en>.

World Conferences on Research Integrity Foundation. (2026). *The Athens Statement: Embedding research integrity in cross-sectoral research and in engagement for policymaking*.

On behalf of NREC,

Yours sincerely

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