

SAFEGUARDING GOOD SCIENTIFIC PRACTICE

Updated September 2016

1. INTRODUCTION

- 1.1 As a publicly-funded organisation, the BBSRC has a responsibility to ensure that the funds it invests are spent properly, in accordance with the law and in the public interest. Included within this responsibility is a need to draw the attention of members of the scientific community funded by the BBSRC to the need to conduct their research, and to be seen to do so, according to best scientific practice.
- 1.2 BBSRC expects the highest standards of scientific integrity to be adhered to by the researchers and students it funds, whether they are employees of the BBSRC or of other institutions. The BBSRC also expects these standards to be maintained by all individuals engaged on the BBSRC's business, in particular in the setting of scientific priorities and in the assessment of research. This statement addresses the issues involved in the proper conduct of scientific research, and provides guidance on the standards expected. It also considers the procedures to be followed should allegations of scientific misconduct be made.

This statement complements the [RCUK standards and policies for Research Integrity](#) and the [Universities UK Concordat to Support Research Integrity](#). It applies to:

- any individual who is granted funding or applies for funding from the BBSRC, including:
 - researchers, fellows and scientific support staff at Higher Education Institutions and academic analogues;
 - researchers, fellows and scientific support staff employed by or otherwise working in or for institutions funded by the BBSRC;
 - students funded by the BBSRC and their supervisors;
 - members of the scientific community wishing to apply to the BBSRC for funding;
 - administrators at Higher Education Institutions and academic analogues;
- any person involved in BBSRC's peer review processes, including:
 - members of BBSRC Council, Council's Boards, Panels, and Committees; or Visiting Groups reviewing BBSRC-sponsored institutes;
 - other BBSRC peer review bodies;
 - referees;
 - BBSRC administrators;

- any institution or body which employs, engages or sponsors any individual supported by BBSRC funding or applicant for BBSRC awards. BBSRC funding is awarded to the institution, not to the individual.

2. PRINCIPLES OF GOOD SCIENTIFIC PRACTICE

2.1 The BBSRC cannot be prescriptive about individual approaches taken by scientists to solving particular research problems. However, in the conduct of all research, all persons to whom this statement applies must comply with the following general principles:

Professional standards

Honesty

2.2 At the heart of all scientific endeavour, regardless of discipline or institution, is the need for scientists to be honest in respect of their own actions in scientific research and in their responses to the actions of other scientists. This applies to the whole range of scientific work, including experimental design, generating and analysing data, publishing results, and acknowledging the direct and indirect contributions of colleagues, collaborators and others. All individuals to whom this statement applies must not commit any act of scientific misconduct. Scientific misconduct includes:

- piracy: the deliberate exploitation of ideas from others without acknowledgement;
- plagiarism: the copying of ideas, data or text without permission or acknowledgement;
- fraud: deliberate deception, including the invention of data, and the omission from analysis and publication of inconvenient data.

Openness

2.3 While recognising the need for scientists to protect their own research interests in the process of planning their research and obtaining their results, the BBSRC encourages the scientists it funds to be as open as possible in discussing their work with other scientists and with the public. See also paragraphs 2.18 to 2.23.

Guidance from professional bodies

2.4 Where available, scientists shall observe the standards of scientific practice set out in guidelines published by scientific societies and other relevant professional bodies.

Leadership and cooperation in research groups

2.5 The culture and tone of procedures within any organisation must be set by individuals in authority. It is the responsibility of the heads of research institutions (Vice Chancellors, Principals, Institute Directors, etc.), their senior colleagues, and each research group leader to ensure that a climate exists that allows BBSRC research to be conducted in accordance with good scientific practice.

- 2.6 Individuals cited at 2.5 should create a research environment of mutual cooperation, in which all members of a research team are encouraged to develop their skills and in which the open exchange of scientific ideas is fostered. They must also ensure that appropriate direction of research and supervision of researchers and research students are provided, and that staff under their direction are aware of relevant legislation and published guidance.
- 2.7 It is the responsibility of individual researchers and support staff to work in accordance with the standards set and to contribute to the research effort in a spirit of cooperation.

Ethical practice

- 2.8 Throughout the lifecycle of their scientific investigations, researchers should work to ensure that ethical issues relating to the research project are identified and managed. Ethical issues should be interpreted broadly and may encompass areas where regulation and approval processes exist as well as areas where they do not. Examples include, among other things, relevant codes of practice, the involvement of human participants, tissue or data in research, the use of animals or research that may result in damage to the environment.
- 2.9 Researchers should also consider any risks that their research will generate outcomes that could be misused for harmful purposes. Where such risks exist, researchers should seek advice and take active steps to minimise them. Institutions must have in place mechanisms to ensure that risks of misuse associated with ongoing research programmes are identified and actively managed, and to provide advice to the researchers that they employ on these issues.
- 2.10 BBSRC-funded researchers should also familiarise themselves with current requirements concerning access and sharing of benefits arising from the utilisation of genetic resources. Further details are given at **Annex 1**.
- 2.11 BBSRC is also a signatory to the Government-led [Joint Code of Practice for Research](#), which applies to BBSRC-funded research in the [National Institutes of Biosciences](#). The Code lays out a framework for the proper conduct of research using best scientific practice from the start of all research projects.

Use of animals

- 2.12 Despite significant progress in recent years to reduce the numbers of animals needed in individual experiments and to replace animals with alternatives, there are still areas of research in which the use of animals remains essential. BBSRC supports the continued use of animals in scientific research, but only when strict conditions are met, as detailed in our [policy on the use of animals](#).

Genome editing in pre-clinical research

- 2.13 BBSRC, together with other funders, supports the continued use of genome editing techniques in preclinical research. This includes the use of the technology for research purposes in human reproductive cells and early embryos, where this is fully justified, scientifically and ethically, and within the confines of the law. Further details are available in the [joint position statement on genome editing](#).

A critical approach to research results

- 2.14 Scientists should always be prepared to question the outcome of their research. While acknowledging the pressures - of time and resources - under which researchers often have to work, the BBSRC expects research results to be checked for accuracy and consistency by the individual researcher responsible for them and by the team leader before being made public: individual researchers and relevant research team members must be able to explain and justify how the results were reached.

Documenting results and storing primary data

- 2.15 Throughout their work, BBSRC requires researchers to keep clear and accurate records of the scientific procedures followed and of the results obtained, including interim results. This is necessary not only as a means of demonstrating proper scientific practice, but also in case questions are subsequently asked about either the conduct of the research or the results obtained. For similar reasons, data generated in the course of research must be kept securely in paper or electronic form. BBSRC expects data to be securely held for a period of up to ten years after the completion of a research project, as appropriate for the discipline and data type. Institutions receiving funding from the BBSRC are expected to have guidelines setting out responsibilities and procedures for keeping data.

Research reproducibility

- 2.16 There is increasing concern within the biomedical research community about the lack of reproducibility of key research findings. If too many results are irreproducible, it could hinder scientific progress, delay translation and waste valuable resource. It also threatens the reputation of the life sciences and the public's trust in research findings.
- 2.17 BBSRC is working with the [Academy of Medical Sciences](#), the [MRC](#) and the [Wellcome Trust](#) to explore the challenges and opportunities for improving the reproducibility and reliability of biomedical research in the UK. The funders have produced [a report and a summary of possible strategies](#) to improve reproducibility. We encourage our researchers to consider the above strategies, and avail themselves, where required, of training opportunities in research reproducibility as part of continuous professional development.

Publishing results; disseminating and reporting outputs

- 2.18 Once results have been published, where appropriate, the BBSRC expects scientists to make available relevant data and materials to others, on request. It is a condition of BBSRC awards for research and training that research results are published in an appropriate form, usually papers in refereed journals. This has long been widely accepted as the best system for research results to be reviewed - through the refereeing process - and made available to the scientific community for verification or replication. The issue of authorship is important in the context of good scientific practice, and the BBSRC expects the matter to be taken seriously. In line with the general guidance given by [Nature](#), BBSRC requires that anyone listed as an author on a paper accepts personal responsibility for ensuring that they are familiar with the contents of the paper, and that they can identify their contributions to it.
- 2.19 The practice of honorary authorship is unacceptable. BBSRC also requires acknowledgement of its support in all publications arising from the research it funds, with the award number quoted where possible.
- 2.20 In the interests of making publicly-funded research increasingly accessible, the Research Councils, under the auspices of Research Councils UK, have a [policy on access to published research outputs](#). The aim is for all users to be able to read published research papers in an electronic format and to search for and re-use (including download) the content of published research papers, both manually and using automated tools (such as those for text and data mining), provided that any such re-use is subject to full and proper attribution. Block grants to institutions have been made available to help cover the cost of open access publication.
- 2.21 BBSRC supports [Europe PMC](#) as part of our commitment to encourage our research community to make readily available their research outputs. Guidance on when BBSRC-funded researchers should opt to submit papers to Europe PMC is detailed at **Annex 2**.
- 2.22 Researchers also need to be aware of their obligations with respect to sharing other outputs generated from BBSRC-funded research. Researchers should refer to the BBSRC [Data Sharing Policy](#) and, where such exists, the [Data Management Plan](#) associated with the specific research grant, as well as the [UK Concordat on Open Research Data](#). Our expectations for the sharing of biological resources are set out in Section 4 of the [BBSRC Research Grants Guide](#).
- 2.23 All recipients of BBSRC funding are required to [report](#) emerging outputs, outcomes and impacts for the duration of their awards and for up to five years beyond. BBSRC uses the [researchfish@](#) online system to collect information on the outputs, outcomes and impacts that have arisen from BBSRC-funded research and training.

Acknowledging the role of collaborators and other participants

- 2.24 In all aspects of research, the contributions of formal collaborators and all others who directly assist or indirectly support the research must be properly acknowledged. This applies to any circumstances in which statements about the research are made, including provision of information about the nature and process of the research, and in publishing the outcome. Failure to acknowledge the contributions of others is regarded as unprofessional conduct. Conversely, collaborators and other contributors carry their share of the responsibility for the research and its outcome.

The needs of new researchers

- 2.25 Researchers who are new to the scientific community may face particular difficulties. Responsibility for ensuring that students, fellows and other new researchers understand good scientific practice lies with all members of the community, but particularly with senior scientists and research training supervisors. Research institutions should have in place systems which allow students and new researchers to adopt best practice as quickly as possible, for example, formal training or mentoring schemes.
- 2.26 BBSRC endorses the [Vitae Researcher Development Statement](#), which articulates the knowledge, behaviours and attributes of successful researchers and encourages them to realise their potential, including aspects of research governance.

Misuse of Research

- 2.27 BBSRC strives to support research of the highest scientific and ethical quality that will advance knowledge and its application to deliver benefit to the public. There is a risk, however, that the results of some types of research could also potentially be misused to cause harm. BBSRC, together with other funders, has a joint policy statement on [Managing the risks of research misuse](#). This sets out a shared approach to managing risks, and describes how we think the broader research community should play their part.

3. EXPECTATIONS

- 3.1 The BBSRC expects all institutions in receipt of its funding to accept their responsibilities in safeguarding good scientific practice. To be eligible to receive funding, each institution must have in place (a) code(s) of good practice addressing each of the issues raised in this statement. The code(s) should be available to and binding on all relevant staff in the institution.
- 3.2 All individuals involved in research or training funded by BBSRC must abide by their institution's code. Moreover, any individual who has reason to believe that malpractice in research has taken place should draw this to the attention of the appropriate authorities, normally the employer of the person(s) suspected of

perpetrating the malpractice. Individuals who make allegations in good faith are protected by the [Public Interest Disclosure Act 1998](#).

- 3.3 Staff employed on BBSRC Terms & Conditions should also be aware of the [Research Council Whistleblowing Policy](#), which encourages and enables employees to speak out when they encounter or suspect malpractice.

4. INVOLVEMENT IN ASSESSMENT PROCEDURES

- 4.1 The need for proper conduct applies equally to those involved in the BBSRC's procedures for setting scientific priorities and for assessing research, including the initial decisions on what will be funded, the monitoring of progress and the evaluation of the outcome. This section is relevant to applicants for BBSRC support, members of BBSRC Council, Council's Boards, all peer review committees and panels, referees and employees at BBSRC Office.

Integrity in applying to BBSRC

- 4.2 When seeking BBSRC support of any kind (grants, fellowships and studentships), applicants must ensure that the information they submit is in accordance with this statement, the guidance provided by the BBSRC, and is clear and accurate. All parties to the application form (applicants, co- applicants, heads of department, finance officers and institutions) carry this responsibility. Any act of scientific misconduct in an application may result in BBSRC applying any of the sanctions set out in Section 6 of this statement.
- 4.3 In the course of the appraisal process, applicants must not seek identify or approach assessors. Applicants are normally asked to nominate suitable referees who may be invited to comment at the discretion of the BBSRC. The BBSRC will also normally respect an applicant's stated wish not to approach particular individuals.

The role of peer reviewers

- 4.4 The assessment procedures used by the BBSRC are based extensively on peer and merit review, combining as necessary the views of expert referees and of committees or panels, whose members have been drawn from the BBSRC's academic and other user communities. The BBSRC recognises that the system relies heavily on the good will of the research community and strives to minimise the calls on an individual's time. The BBSRC is also aware of the potential pitfalls associated with peer review, and has in place mechanisms for monitoring its procedures.
- 4.5 Individuals agreeing to contribute to the BBSRC's peer review processes are required to observe the following rules:

- All the information made available to them as peer reviewers must be treated in confidence; it must not be disclosed to other parties, except in circumstances where an individual wishes to seek specific additional expert advice; in such cases the third party must also respect the confidentiality of the information, and BBSRC must be informed that this has happened;
- Assessors (referees and members of the peer review body) must not take advantage of any information obtained as a result of their role; in particular they must not copy or plagiarise unfunded proposals.
- They must declare any conflicts of interest and, normally, decline an invitation to referee or withdraw from the relevant discussion(s). In particular, the BBSRC regards anyone with close professional, personal or commercial interest in a piece of work, or members of the same university or institute department as the applicant(s), as ineligible to comment.
- If individuals consider themselves to be insufficiently expert in the area of science on which they have been asked to comment, they must make this clear; in such circumstances, they should return the document(s) they have been asked to judge, and delete all electronic versions.

4.6 BBSRC-sponsored institute staff, and members of peer review panels/ committees often play a part in the development of BBSRC policy. Members are selected for their individual expertise and not as representatives of particular areas of science or any other group. In discussions of scientific priorities they should not lobby for any particular interest but, as far as is possible, offer impartial advice.

The role of administrators

4.7 BBSRC staff must:

- treat as strictly confidential all information provided to them in the course of the procedures;
- ensure that data provided (electronically or on paper) are held securely;
- not divulge to applicants or award holders the names of referees;
- provide feedback to applicants and award holders in line with the BBSRC's agreed procedures;
- as far as possible be open and helpful when communicating with applicants and award holders.

4.8 Within BBSRC Office, staff involved in the peer review process also have responsibilities for ensuring the procedures are properly conducted. These procedures include the appraisal of applications, evaluation panels and assessment of strategically funded institutes.

4.9 More widely, the BBSRC has a responsibility to have in place clear and readily available guidance on the various procedures to be followed by application (see the [BBSRC Research Grants Guide](#)). In setting assessment policy, the BBSRC must also consider the pressures imposed on the community by assessment procedures, in terms both of the growing burden on individuals and of the perceptions held by the

community on the need to publish at all costs. Assessment procedures should achieve the right balance between qualitative and quantitative methods.

- 4.10 Assessment should also allow the identification and, if considered appropriate, the separate treatment of applications from new researchers (see the [BBSRC New Investigator Scheme](#)).

5. ALLEGATIONS OF SCIENTIFIC MISCONDUCT

- 5.1 The BBSRC takes seriously any allegation of scientific misconduct. Where any allegation of scientific misconduct is made, the institution concerned must thoroughly investigate the allegation and prepare a written report, in accordance with the principles and procedures set out in the [UUK Concordat](#) and [RCUK Policy on Governance of Good Research Conduct](#).
- 5.2 Where the accused individual is employed by an institution, that institution is responsible for investigating the allegation. Where the accused is a student, the institution employing the student's principal supervisor is responsible. Where the accused individual is working at an institution, but not formally employed there (e.g. a visiting researcher), the institution at which the accused is working at the time of the alleged transgression is responsible.
- 5.3 Allegations involving researchers employed on BBSRC Terms & Conditions should be considered locally through reporting to the Institute Director, as set out in the [BBSRC Employment Code](#), which is in line with the [RCUK policy on Governance of Good Research Conduct](#).
- 5.4 Once an allegation is brought to our attention, BBSRC reserves the right to suspend the processing of any applications in which the accused is/are involved, pending the outcome of the investigation. The applicant shall only be entitled to resubmit the application if:
- (a) The applicant is subsequently found not to have committed an act of scientific misconduct or the allegation is withdrawn; and
 - (b) BBSRC is reasonably satisfied with the investigation which has been concluded.
- 5.5 If communication is received about alleged plagiarism involving an application to BBSRC for funding research, the procedure set out at **Annex 3** applies.

6. Sanctions: BBSRC as funder

The role of institutions

- 6.1 If an institution fails to comply with its obligations, such that:
- a) the investigation into an allegation is prejudiced, suspended or not completed; and/or

- b) it does not correctly follow its own procedures for investigation of the allegation, BBSRC reserves the right to revoke the award of the relevant grant or reject the application in question.

6.2 If an institution fails to comply with its obligations, such that:

- a) it persistently fails correctly to follow its own procedures for investigation of allegations; and/or
- b) persistent scientific misconduct has been committed by individuals from that institution applying for, or in receipt of, funding from BBSRC or any other Research Council; BBSRC reserves the right to suspend any further applications from that institution.

6.3 Institutions must have in place clear sanctions against an individual in instances where an allegation is upheld.

Implications for individuals

6.4 If, following any investigations in accordance with Section 5, the individual is found not to have committed an act of scientific misconduct, or the allegation is withdrawn, the institution must protect the interests of the individual, and ensure that appropriate publicity is given to this outcome where necessary. All persons interviewed or otherwise informed of the allegations should be notified of the outcome. Investigators should also make clear whether or not they believe the allegation was made in good faith. If it was, the interests of the complainant must also be protected, in keeping with the Public Interest Disclosure Act 1998 (or RC Whistleblowing Policy for those on BBSRC terms and conditions). If the investigators suspect the allegation was malicious this would constitute malpractice, and should be dealt with according to the relevant procedures.

Sanctions: BBSRC as employer

6.5 For BBSRC employees, the BBSRC's Employment Code, which forms part of the individual's terms and conditions of employment, states that: "employees must maintain the highest standards of honesty and integrity in presentation of scientific work, data and results. Fabrication of data or results is gross misconduct". Under the code, gross misconduct may lead to dismissal for a first offence, and this dismissal may be summary.

7. MONITORING

7.1 The BBSRC will monitor the effectiveness of policies put in place to ensure good scientific practice, calling if necessary on the offices of an independent ombudsman. Together with other Research Councils, the BBSRC requires the institutions it funds to report annually to RCUK the number of allegations involving its funding that have been or are being formally investigated.

CONTACT

General inquiries relating to this Statement may be addressed to:

Dr. Sophia Abbasi, Senior Policy Manager, Corporate Policy & Strategy Group
(sophia.abbasi@bbsrc.ac.uk)

Allegations of scientific misconduct should be addressed to:

complaints.officer@bbsrc.ac.uk.

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UTILISATION OF GENETIC RESOURCES IN BBSRC-FUNDED RESEARCH: ACCESS AND BENEFITS SHARING (“ABS”)

1. The [Nagoya Protocol on Access to Genetic Resources and the Fair and Equitable Sharing of Benefits Arising from their Utilization](#) is now part of the international *Convention on Biodiversity*. Both the European Union and the UK have ratified the Protocol, becoming Party on 12th October 2014 and 22nd May 2016 respectively.
2. BBSRC-funded researchers utilising genetic resources accessed on or after 12th October 2014 are legally obliged to consider potential obligations under [Regulation \(EU\) 511/2014](#) on compliance measures for users and [UK Statutory Instrument No.821\(March 2015\)](#). Researchers are also subject to any prevailing national access laws for obtaining and utilising genetic resources originating in other countries.
3. Researchers accessing and utilising genetic resources for BBSRC-funded projects should check whether their activities fall within scope of applicable legislation, both in Europe and the provider country. Where compliance is required, researchers should follow due process to obtain *Prior Informed Consent* (PIC) and seek *Mutually Agreed Terms* (MATs) for access and utilisation before obtaining the research material in question and conducting any research and development. Further guidance is available via [Defra](#).

BBSRC POLICY ON EUROPE PMC

1. As part of our commitment to encourage our research community to make their research outputs readily available, BBSRC is one of the funders of [Europe PMC](#) (formerly UK PubMed Central (UKPMC), launched in 2007). Europe PMC mirrors the US-based [PubMed Central](#) (PMC) and provides a digital archive of full-text, peer-reviewed research publications.
2. If a paper arising from BBSRC funding is published in a journal that is already participating in Europe PMC, it will be submitted automatically to Europe PMC.
3. Alternatively, if the paper is published in a journal that allows self-archiving, scientists can submit their research papers to Europe PMC themselves using [Europe PMCPlus](#).
4. Although Europe PMC was developed primarily for papers in the biomedical field, Europe PMC may be appropriate for papers from all BBSRC funded research. All scientists funded by BBSRC are therefore encouraged to submit papers to Europe PMC, with the expectation that those working in the basic biosciences (fundamental biology) would undertake this as a matter of course.

BBSRC GUIDELINES FOR DEALING WITH ALLEGED PLAGIARISM CONCERNING APPLICATIONS TO BBSRC

If communication is received about alleged plagiarism involving a grant application to BBSRC, the following procedure applies:

Initial Action

1. The Complaints Officer should be informed immediately.
2. The officer who has received the communication should acknowledge receipt of the complaint and say that the Complaints Officer will be in contact.
3. The appropriate information about the complaint and the relevant documents (the original application/grant and the one that may contain information that has been plagiarised), as well as any other information, should be sent to the [Complaints Officer](#) who will instigate an internal review of the matter by an appropriate officer and avoiding possible conflicts of interest. At this stage contact with all parties involved in the allegations should be through the Complaints Officer.

Internal Review

4. The Office review, which should include a summary of the allegation and a view on whether the allegation is about an overlap of 'ideas' or 'wording', should be carried out and completed by the deadline as determined by the Complaints Officer. Where external scientific expertise is required, the Complaints Officer will contact an appropriate member of a BBSRC committee to assist with the review in strictest confidence.

Contact with the Complainant

5. While the internal review is ongoing, the Complaints Officer will write to the complainant about the process and explain the following:
 - (a) The BBSRC Conditions of Grant and BBSRC Statement on Safeguarding Good Scientific Practice make it clear that it is for the employer of the person accused to undertake the review in a timely manner and not for BBSRC.
 - (b) The institution employing the person about whom the complaint has been made, should have in place procedures that meet BBSRC good practice guidelines. BBSRC's role is to see that these procedures are adhered to in a timely manner.

- (c) The documents involved in allegations of plagiarism are not public domain as they are applications to BBSRC and are therefore confidential with restricted access. The employer/institution concerned may need to see copies of these confidential documents if it is to conduct an inquiry. The complainant must therefore give written agreement to BBSRC that the plagiarised proposals can be sent to the investigating institution (see paragraph 6).
- (d) The complainant should understand that without this agreement an investigation will not be possible.
- (e) It should also be understood that it will be difficult for the complainant to remain anonymous. Even if the institution concerned has a whistle blowing procedure, it will be fairly obvious who has made the complaint. Moreover, the complainant would not be able to put their side if their name is withheld from the inquiry.

Contact with the Institution

- 6. Irrespective of the findings of the internal office review BBSRC will need explicit instructions and agreement from the complainant for BBSRC to alert the institution, for their name to be disclosed to the investigating institution and to allow a copy of the alleged plagiarised proposal as submitted to BBSRC (whether funded or not) to be sent to the institution. On receiving this agreement the Complaints Officer will write to the institution, giving the above information, and asking to be informed of the process the institution intends to take and the timescale.
- 7. If there is identical wording, then having the two documents may be sufficient for the institution to start the inquiry. If there is overlap of ideas, the institution may have to write to the complainant indicating that to undertake an inquiry it will require further details as why the ideas are not deducible from public domain information (e.g. publications; presentations at conferences), or are not a natural consequence of two groups pursuing independent but similar lines of inquiry.

BBSRC Action

- 8. BBSRC will have to decide at this stage on how to deal with the application from the accused:
 - (a) If there is clear overlap of words, with the agreement of the relevant Group Director, the processing of the proposal should be stopped and, if applicable, funding not agreed and withheld until the allegations have been addressed.
 - (b) If there is an overlap of ideas, the situation is less clear, but, in discussion with the relevant Group Director, the starting point should be that the processing of the proposal should continue.
 - (c) If in fundable range, funding should normally be withheld until the complainant has responded to the Complaints Officer on whether they wish to proceed with a formal investigation.

- (d) If the complainant confirms then the next decision point would be the outcome of the institution initial review of whether there was a prima facie case to answer.
 - (e) If the complainant does not want to proceed and BBSRC is content that proper procedures have taken place, then the matter is closed and all stopped applications will continue to completion and the accused will be able to resume submitting applications to BBSRC.
9. If there is a prima facie case to answer, BBSRC should continue to withhold processing of any existing proposals and not allow the accused employee(s) of the investigating institution to submit applications until the inquiry has been completed.
 10. If the allegation is upheld, BBSRC would need to be informed of what actions the institution is taking against the accused. BBSRC will have to decide whether to continue to disallow applications from this applicant and for what period.
 11. At all stages, it must be made clear to all parties that it is not BBSRC's role to carry out the inquiries. It is up to the employer of the accused.
 12. Complaints about BBSRC procedures will be investigated by the Complaints Officer in line with the agreed procedures.
 13. If the alleged plagiarism is against a BBSRC employee, the relevant institute will be asked to undertake the inquiry on behalf of BBSRC as employer.
 14. At all stages the Complaints Officer must be kept informed of all exchanges of information and contact with all parties involved in the allegation.