



## BREACHES OF RESEARCH INTEGRITY PROCEDURE

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## 1. Purpose

This Procedure prescribes how HELI manages potential breaches of the Australian Code for the Responsible Conduct of Research, 2018 ([the Code](#)). This Procedure prescribes:

- a. how complaints of potential breaches can be made;
- b. the mechanisms for assessing and investigating potential breaches; and
- c. the processes for managing and resolving potential and actual breaches, including requests for reviews of decisions.

This procedure ensures that HELI has developed mechanisms for preventing, reporting, investigating and resolving potential breaches of the Code.

## 2. Scope

This procedure applies to all potential breaches of the Australian Code for the Responsible Conduct of Research, 2018 (the Code). It applies to:

- a. all staff;
- b. all Higher Degree by Research (HDR) candidates;
- c. other members of the Institute community involved in academic research.

This procedure does not apply to students undertaking coursework units. Student academic misconduct is dealt with under the Academic Integrity Policy.

## 3. Definitions

The Code defines a Breach as “a failure to meet the principles and responsibilities of research integrity, as described in the Code and may refer to a single breach or multiple breaches.” Breaches may also refer to the failure to follow the Institute’s related research policies and procedures.

**Breaches** are listed in the Code and include but are not limited to:

- a. not meeting required research standards such as failing to comply with ethics requirements, conducting research without requisite approvals, concealment of breaches of the Code;
- b. fabrication, falsification and misrepresentation of data and source materials;
- c. plagiarism;
- d. failure to meet Research data management requirements;
- e. issues related to Research supervision such as failure to provide adequate guidance or mentorship to researchers or research trainees under supervision;
- f. failures to meet authorship requirements such as misleading ascription of authorship or failure to acknowledge the contributions of others fairly;
- g. failure to disclose and manage conflicts of Interest;
- h. failure to conduct peer review processes responsibly;
- i. contract cheating is a form of academic dishonesty which involves procuring academic work from a third party and submitting the work as your own;
- j. unauthorised use of generative artificial intelligence tools.



**Research misconduct** is defined by HELI as a serious breach of the Code, or the Research and Scholarship Policy, other relevant HELI policies and procedures, and/or relevant legislation, which is also intentional, reckless, or negligent. Research Misconduct does not include honest differences in judgement or unintentional, honest and minor errors.

#### 4. Procedures

This procedure must be read in conjunction with the Code and the Guide to Managing and Investigating Potential Breaches of the Australian Code for the Responsible Conduct of Research (for the purpose of this Procedure – ‘the Guide’).

All researchers must conduct themselves in a manner consistent with the standards set out in the Code, the Guide, HELI’s Responsible Conduct of Research Policy, and other relevant governance documents. These documents also include instructions and approvals from relevant ethics committees.

#### 5. Roles and responsibilities

Researchers must ensure that they:

- a. apply high ethical and Research Integrity standards when conducting Research;
- b. bring forward instances of questionable Research;
- c. cooperate in assessment or investigation of potential or found breaches of the Code; and
- d. if necessary, contribute evidence relevant to potential or found breaches of the Code.

HELI encourages staff, students and third parties to report any potential breaches of the Code.

HELI indemnifies officers of HELI responsible for assessing and investigating allegations of breaches.

**Researcher Person(s)** conduct, or assist with the conduct of, research.

**Respondent Person(s)** are subject to a complaint or allegation about a potential breach of the Code.

**Responsible Executive Officer (REO)** is the senior officer in an institution who has final responsibility for receiving reports of the outcomes of processes of assessment or investigation of potential or found breaches of the Code and deciding on the course of actions to be taken.

**Review Officer (RO)** is a senior officer with responsibility for receiving a request for a procedural review of an investigation of a breach of the Code.

**Support person** is a person who accompanies a party to an interview regarding a breach of the Code.

Officers of HELI involved in the management and investigation of potential breaches are shown in Table 1.

Where a complaint is made against a DO, the REO will ensure an alternative DO manages that



complaint.

Where a complaint is made against the REO, the CEO will appoint an alternative REO.

**Table 1: Terms for the recommended individuals involved in the process of managing and investigating potential breaches of the Code.**

| <b>Term used in this Procedure</b>         | <b>Recommended individual</b>  | <b>Definition in the Code (Section 9)</b>   |
|--|--|---|
| <b>Responsible Executive Officer (REO)</b> | Academic Dean  | A senior officer in an institution who has final responsibility for receiving reports of the outcomes of processes of assessment or investigation of potential or found breaches of the Code and deciding on the course of action to be taken.  |
| <b>Designated Officer (DO)</b>             | Chair, Research Degree Committee   | A senior professional or academic institutional officer or officers appointed to receive complaints about the conduct of research or potential breaches of the Code and to oversee their management and investigation where required.   |
| <b>Assessment Officer (AO)</b>             | Academic Operations and Compliance Manager   | A person or persons appointed by an institution to conduct a preliminary assessment of a complaint about research.  |
| <b>Research Integrity Advisor (RIA)</b>    | Research Coordinator; Discipline Leaders; Ethics Committee Members; Academic Integrity Officer | A person or persons with knowledge of the Code and institutional processes nominated by an institution to promote the responsible conduct of research and provide advice to those with concerns or complaints about potential breaches of the Code.   |
| <b>Research Integrity Office (RIO)</b>     | Key people nominated in this procedure.  | Staff with responsibility for management of research integrity at an institution.   |
| <b>Review Officer (RO)</b>                 | CEO, HELI  | A senior officer with responsibility for receiving requests for a procedural review of an investigation of a breach of the Code.  |
| <b>Investigation Panel</b>                 | Appointed on a case-by-case basis  | People nominated by the REO on a case-by-case basis to investigate a complaint and produce a report detailing findings of fact and recommendations for the REO. Panel members should not have a conflict of interest in relation to the respondent and must not be from the same operational unit as the respondent |
| <b>Support Person</b>                      | A/Dean L&T   | A person who accompanies a party to an  |



| Term used in this Procedure | Recommended individual | Definition in the Code (Section 9)        |
|-----------------------------|------------------------|---|
|                             |                        | interview regarding a breach of the Code. |

## 6. Making a complaint and raising a potential breach

- a. A complaint about a potential breach of the Code may be made by any person.
- b. Potential complainants are encouraged to seek advice from an RIA of the Institute.
- c. A complaint about a potential breach may be made verbally or in writing to the DO via the nominated email ([Breach@heli.edu.au](mailto:Breach@heli.edu.au).)
- d. The person lodging the complaint (the complainant) should be encouraged by the Institute to provide all relevant information about the complaint, but the process of making a complaint should not be onerous.
- e. The complainant can be requested by the Institute to provide additional information if necessary. The Institute may assist the complainant to lodge a complaint.
- f. Complaints can be made anonymously; however, lodging a complaint anonymously may limit the Institute’s knowledge and understanding of the complaint, and may limit any resulting assessment or panel investigation.
- g. Verbal complaints made to the DO will be confirmed with the complainant in writing.
- h. The Institute will ensure the complainant is protected from adverse circumstances and adverse consequences for having made the complaint.
- i. Complainants must not make a complaint in bad faith or provide information they know to be inaccurate or misleading. Doing so may result in disciplinary action and where appropriate will be reported to an appropriate external regulatory body or agency.

## 7. Consideration and management of complaints

### 7.1 Receipt and Consideration of Complaints

- a. The DO receives all complaints regarding research conduct.
- b. Upon receiving a complaint, the DO shall determine whether the complaint relates to a potential Breach of the Code, and if it does, the matter is referred to the AO for assessment, unless the DO decides that further assessment and investigation is unnecessary.
- c. If the complaint does not represent a potential Breach of the Code, it may be dismissed or referred to other relevant institutional processes, where necessary.
- d. Throughout investigation and management of a Complaint, the welfare of the complainant is a key concern and HELI will ensure the complainant is protected from adverse consequences for having made the complaint. The DO will ensure appropriate communication with the complainant.
- e. The DO may make a determination without further investigation if:
  - i. the matter may be addressed at the local level, such as where the matter is an unintentional administrative error, or a clerical error or oversight related to research administration;
  - ii. the respondent has admitted to breaching the Code; or
  - iii. an investigation into the matter has already commenced under another Institute process.
- f. If a complainant withdraws a complaint, the DO will continue to consider the complaint and will advise the REO that the complaint was withdrawn.



- g. If the DO identifies a potentially significant risk to humans, animals, the environment, or national security, they must immediately advise the REO.

## **7.2 Preliminary Assessment of Potential Breach**

- a. The purpose of the preliminary assessment is to gather and evaluate facts and information, and assess whether the complaint, if proven, would constitute a Breach of the Code. An admission of breach by the Respondent does not end the preliminary assessment process. In such cases, HELI may still be required to proceed with an investigation.
- b. The DO will assign the complaint to a suitable AO.
  - i. The AO must be a senior member of staff.
  - ii. The AO must not be from the same unit as the respondent.
  - iii. The AO should not have a conflict of interest in relation to the respondent.
  - iv. Conflicts of interest must be managed in accordance with HELI'S Conflicts of Interest Policy.
- c. The AO will conduct a preliminary assessment in a timely manner and in no more than 40 working days of the receipt of the complaint by the DO.
- d. HELI authorizes the AO to secure all documents and other evidence necessary to assess the allegation.
- e. The AO will collate, prepare and retain records of the assessment in accordance with HELI'S Records Management Policy.
- f. During the assessment, the AO may contact the person or persons against whom the complaint is made (the respondent) in writing. If the AO contacts the respondent, they will:
  - i. notify the respondent of the complaint and advise them that an assessment of a potential breach is underway;
  - ii. ensure the notification provides sufficient details about the complaint to allow the respondent to understand the nature of the complaint and respond;
  - iii. invite the respondent to meet with the AO, with the option to bring a support person. A record of any meetings must be prepared, and the respondent provided with a copy;
  - iv. offer to clarify any aspects of the complaint with the respondent unless inappropriate to do so; and
  - v. invite the respondent to provide a written response in no less than 10 working days.
- g. During the assessment, the AO will, where necessary:
  - i. seek further information from the complainant and the respondent;
  - ii. seek the involvement of those in supervisory roles in the potential breach;
  - iii. consider the need to involve other institutions, stakeholders or external experts in the matter;
  - iv. consult with one or more experts to provide specific or independent advice about the conduct of the assessment.
- h. The AO ensures Records of preliminary assessment are prepared and maintained and that appropriate processes are followed in a timely manner.
- i. The AO will consider whether to consult with and involve other parties, both internal and external to HELI. It may be necessary to obtain information and evidence, and to bring in expertise from other sources.
- j. It may be necessary to discuss the matter with the Respondent. In this case, the AO will notify the respondent with sufficient detail for the Respondent to understand the nature of



the complaint. Respondents will be offered an opportunity to respond in writing within ten working days. An invitation to meet may be extended, with the option for the Respondent to bring a support person.

- k. On completion of the preliminary assessment, the AO will provide written advice to the DO in a timely manner. This will include a comprehensive overview of the process undertaken, facts and information, details of how the potential breach relates to the Code or institutional processes, and recommendations for further action.
- l. After completing the assessment, the AO will present a preliminary assessment report to the DO. This report must include:
  - i. recommendations for further action;
  - ii. a summary of the assessment process;
  - iii. an inventory and evaluation of the facts and information gathered and analysed, including the response from the respondent; and
  - iv. an assessment of how the potential breach relates to the principles and responsibilities of the Code, to other external regulatory frameworks (where necessary), and to the Institute's policies, procedures and related processes.
- m. The preliminary assessment report will be considered by the DO.
- n. The DO will determine whether the matter should be:
  - i. dismissed;
  - ii. resolved locally, with or without corrective actions;
  - iii. referred for investigation; or
  - iv. referred to other processes at HELI.
- o. If the DO dismisses a complaint, the DO must consider the following:
  - i. If the complaint has no basis in fact (for example, due to a misunderstanding or because the complaint is frivolous or vexatious), then efforts, if required, must be made to restore the reputation of any affected parties.
  - ii. If the complaint is considered to have been made in bad faith or is vexatious, the complainant should be subject to appropriate disciplinary measures and processes.
- p. Examples of frivolous, vexatious and bad faith complaints include, but are not limited to:
  - i. fabricating a complaint;
  - ii. making trivial or petty complaints;
  - iii. making repeated, unsubstantiated complaints; or
  - iv. seeking to re-agitate issues that have already been addressed or determined.
- q. If the assessment raised systemic issues associated with the complaint, such as a lack of clarity on the ethical requirements of a research project, HELI will make efforts to address these issues.
- r. The outcomes of the determinations will be communicated to the respondent, the complainant, and other relevant stakeholders as appropriate.
- s. Where referral of an allegation of a Breach of the Code for investigation is not supported, the following actions will be considered:
  - i. efforts, if required, to restore the reputation of any affected parties;
  - ii. efforts to address with the complainant vexatious complaints or complaints considered to have been made in bad faith through appropriate HELI processes;
  - iii. efforts to address any systemic issues identified.



- t. HELI will provide outcomes, if appropriate, to the respondent and complainant at the conclusion of a preliminary assessment in a timely manner.
- u. Where a Respondent ceases employment or affiliation with HELI during or following the complaint process, the complaint will still be investigated as necessary.

### **7.3 Investigation of a Potential Breach**

The purpose of the investigation is to make findings of fact to allow the DO to assess whether a Breach of the Code has occurred, the extent of the breach and the recommended actions. Principles of procedural fairness will be applied throughout the investigation, and the investigation shall be thorough, robust and free from bias. Once it is determined that an investigation is required, the DO will:

- a. prepare statement of allegations;
- b. develop terms of reference for the investigation;
- c. nominate investigation panel members and a Panel Chair;
- d. seek legal advice where appropriate.

The investigation is conducted by an investigation panel, which determines whether, on the balance of probabilities, the respondent has breached the Code.

The Panel consists of one or more members appointed on a case-by-case basis by the REO with advice from the DO. In selecting members of the Panel, the REO will consider:

- a. the expertise and skills required of the members, including:
  - i. an appropriately qualified Chair;
  - ii. experience and expertise in relevant disciplines;
  - iii. prior experience of similar panels and/or other relevant experience; and
  - iv. knowledge and understanding of research, research supervision, research integrity, and related processes;
- b. the appropriate number of members (noting that a Panel can be comprised of one person);
- c. the need for members to be free from conflicts of interest or bias. Panel members must ensure that relevant interests are disclosed to the REO and managed appropriately in accordance with the Conflicts of Interest Policy and Conflicts of Interest Procedure. Where a perceived or actual conflict of interest cannot be managed, the affected panel member must be recused.
- d. Members of the panel may be internal or external to HELI and an appropriate number of members will be selected. The DO will select an Investigation Panel member with appropriate expertise and experience to act as Chair.
- e. Where a panel permits the complainant and/or respondent to have legal representation, the panel also has the right to engage a similar level of legal representation.
- f. Details of the panel will be provided to the respondent, and the respondent will be given the opportunity to raise valid concerns in writing.
- g. The complainant and respondent can choose to engage a support person; however, the support person is to provide personal support only and is not to advocate, represent or speak on behalf of the complainant and respondent.
- h. As part of the investigation, the respondent will be provided an opportunity to respond





to the allegations and evidence and to provide additional evidence that the panel may consider. If a respondent chooses not to reply or appear before the panel, the investigation will continue in their absence.

- i. The complainant may also be given the opportunity to see relevant evidence used in the investigation, where appropriate (e.g., if they are directly affected by the investigation).
- j. All those required to attend the Panel will be given adequate notification.
- k. All those asked to give evidence will be provided with relevant information, which may or may not be de-identified. This information may include:
  - i. schedule of events;
  - ii. relevant terms of reference for the investigation;
  - iii. advice as to how the panel intends to conduct interview, if the interviews will be recorded and whether opportunities to comment on matters raised in interview will be available;
  - iv. the possibility of the use of a support person;
  - v. disclosing interests;
  - vi. confidentiality requirement;
  - vii. procedures that the Panel intends to follow.

Once the Panel is finalised it will convene to develop an investigation plan. The conduct of the investigation will be in keeping with the principles of confidentiality, procedural fairness, the terms of reference as appropriate, institutional processes, the Guide, and the Code. HELI provides all information and resources needed by the Panel, including secretariat support, and maintains a record of evidence.

If the Panel finds during the investigation that the scope and/or the terms of reference are too limiting, the Chair will refer the matter to the DO with an explanation. The DO will consider the matter and determine whether to amend the scope of the investigation and the terms of reference. If the scope of the investigation is revised, the respondent and other relevant stakeholders will be advised, and the respondent given the opportunity to respond to any new material arising from the revised scope.

Any party who requests or is required to attend the Investigation Panel for interview will be given no less than 10 working days' notice. They may bring a support person. If the respondent or complainant requires a higher level of support, they must seek the Panel's approval.

All those asked to give evidence are to be provided with relevant and if necessary de-identified information as prescribed by the Guide.

Parties do not have the right to legal representation unless otherwise determined by the Panel for particular matters.

The Panel will:

- a. assess the evidence (including its veracity) and consider if more evidence is required;
- b. provide the respondent an opportunity to respond to the allegations and to the evidence in writing or in person



- c. and to provide additional relevant evidence to the Investigation Panel;
- d. give the complainant the opportunity to review and respond to relevant evidence if necessary; for example, if
- e. the complainant's interests may be directly or adversely affected by the Investigation;
- f. arrive at findings of fact about the complaint;
- g. consider whether the Code has been breached and the seriousness of any breaches; and
- h. make recommendations as appropriate.

At its discretion, the Panel may request expert advice to assist the investigation.

If the respondent or complainant chooses not to respond to the invitation to attend the Panel, the investigation will continue regardless.

- a. The panel shall determine, on the basis of evidence and balance of probabilities, whether the respondent has breached the Code and the seriousness of any breach.
- b. The panel shall provide a draft Written Report of findings. The draft report, or a summary of all relevant information on which the DO's decision will be based.
- c. Following consideration of any further information, the report is finalised.
- d. The DO will consider findings of fact, evidence presented, and any recommendations made by the panel. The DO will consider the extent of the breach, appropriate corrective actions and if referral to disciplinary procedures is required. The DO will provide the final report to the REO with recommendations.

The Panel will prepare a written report of the investigation, which must include its recommendations and findings of fact, consistent with its terms of reference. The Panel is encouraged to reach a consensus. If any member of the Panel has dissenting views, these views must be included in the investigation report.

Prior to submitting the report to the DO, a draft report will be provided to the respondent for comment within 10 working days. Where a complainant will also be affected by the outcome, the draft report or a summary will be provided to the complainant for comment within 10 working days. Should the respondent or complainant not respond to or attend the Panel, the Panel will continue to finalise the report.

Following consideration of any further information, including responses from the respondent and/or the complainant, the report will be finalised and presented to the REO.

The REO will consider the Panel's report and recommendations and decide a finding of whether there has been a breach of the Code. The REO shall decide either:

- a. a finding of no Breach of the Code;
- b. a finding of a Breach of the Code.

## **8. Finding no breach of the Code**

If the REO finds there has not been a breach, the following will be considered:

- a. if the complaint is found to have no basis in fact, then efforts or actions must be taken to restore the reputation of the respondent;
- b. if a complaint is found to have been frivolous or vexatious, actions should be undertaken to address this with the complainant under appropriate institutional processes; and



- c. the mechanisms for communicating with, and for support for, the respondent and the complainant.

## **9. Finding of a breach of the Code**

If the REO finds there has been a breach of research integrity, the REO will decide the Institute's response and consider a range of matters, including but not limited to the following:

- a. the nature, seriousness and extent of the breach;
- b. any appointments of the respondent and appropriate management of these appointments with other institutions;
- c. efforts or actions that can be undertaken to correct the public record; and
- d. where any systemic issues are identified that these are referred appropriately within the Institute to ensure they are addressed.

The REO may determine that a serious breach of the Code, which is also intentional, reckless, or negligent, constitutes research misconduct.

The REO may also inform the CEO, relevant senior Institute managers, relevant funding agencies, journals, researchers, professional registration bodies, the general public and other relevant parties, as necessary and as determined by the REO.

Where a breach involves corrupt conduct or criminal behaviour, the Institute will refer the matter to the Independent Commissioner Against Corruption (the ICAC), the police, or other external agencies, as necessary.

If at any time the respondent admits to the allegation(s) of the complaint in full, the REO will make a finding of a breach and consider disciplinary action. The REO must also consider if any corrective actions are required as prescribed by this procedure.

## **10. Communication of findings**

Following the REO's consideration of the report of the Panel, the Institute will communicate in writing the decisions and actions to the respondent and complainant. Other relevant parties (such as funding bodies, agencies, authorities or other institutions) will be informed as relevant and/or required. The Institute is obliged to address the findings of an investigation appropriately, even where a respondent leaves the Institute prior to or during an investigation. This may include appropriate and lawful disclosure, correction of the research record, or referral of the matter to the new employing institution.

All efforts must be taken to correct the public record of the research, including publications, if a breach of the Code has affected the accuracy or trustworthiness of research findings and their dissemination.

## **11. Disciplinary action following a finding**

Where there has been a finding of a serious breach or of research misconduct, the REO may refer the case to the CEO. The panel's investigation and the REO's findings will form the preliminary investigation, unless the CEO decides that an additional investigation is required prior to taking disciplinary action.



## 12. Methods for Review of a Breach investigation

A request for a review of an investigation will only be considered on the grounds of procedural fairness. A review will consider the procedures and processes used by the Panel in conducting the investigation in order to affirm, or not, the outcome of the investigation.

A request for a review of the investigation must be lodged by the respondent or the complainant with the REO within 20 days of notification of the outcome of the investigation.

The request for a review should be sent to the designated email address ([breach@heli.edu.au](mailto:breach@heli.edu.au)) and clearly outline the procedural fairness grounds relied upon, including any supporting material or documentation.

Requests for review will be directed by the DO to an appropriate member of the RIO within twenty working days of receiving the request for review from the respondent or the complainant. The RIO member selected should not have a conflict of interest in relation to the complaint and must not be from the same faculty as the respondent. Conflicts of interest must be managed in accordance with the Conflicts of Interest Policy and Conflicts of Interest Procedure.

The RIO member will undertake a review in accordance with the Code, the Guide and the Institute's policies, procedures, and internal processes. They will also consider the procedures and processes used by the Panel in conducting the investigation itself in order to affirm, or not, the related findings of fact and recommendations arising out of the investigation. Where necessary, the RIO member will seek further clarification of the procedures and processes used by the Panel in conducting the investigation itself.

Upon completion of the review, the RIO member will determine whether the conduct of the investigation aligned with the Institute's policies and procedures, the Code and the Guide, and the principles of procedural fairness. Notice of the review determination must be provided to the respondent which advises:

- a. a statement of reasons for the determination;
- b. that the determination is final and conclusive, and may not be the subject of a further review within the Institute;
- c. a website link to the relevant Institute policy and procedures; and
- d. that if not satisfied with the result or the conduct of the Appeals process as described, respondents and complainants may additionally seek external review by the Australian Research Integrity Committee (ARIC) or other appropriate external bodies or agencies.

Interested third parties may not request a review from the RIO member but they may seek external review.

## 13. Safety issues

If at any time it becomes apparent that the complaint relates to an activity that could harm humans, animals or the environment, immediate action must be taken to minimise the risk of harm.

Action is at the discretion of the Institute and is independent of the Code investigation.

Safety issues identified may require referral or notification to an appropriate agency. They may also trigger other institutional responsibilities and processes.



#### 14. Record Keeping

HELI will ensure the confidential storage of Records relating to breaches for a period of seven years.

#### 15. Responsibility

Academic Dean

#### 16. References and Related Documents

- a. The HELI Research Integrity Breach Management Procedure is modelled on and makes reference to sections of the Universities Australia (2018) Guide to Managing and Investigating Potential Breaches of the Australian Code for the Responsible Conduct of Research. Accessed at: <https://www.nhmrc.gov.au/about-us/publications/australian-code-responsible-conduct-Research-2018#block-views-block-file-attachments-content-block-1>
- b. QAF070 HELI Academic Integrity Policy and Procedure
- c. QAF135 Responsible Conduct of Research Policy
- d. QAF 136 Higher Degree Research Policy and Procedure

#### 17. Version History

|                       |   |
|-----------------------|---|
| <b>Document ID</b>    | <b>Breaches of Research Integrity Procedure</b> |
| <b>Category</b>       | Academic  |
| <b>Document Owner</b> | Dean  |
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| Version | Approved by    | Approval Date | Details  |
|---------|----------------|---------------|--|
| 1.0     | Academic Board | 7 March 2024  | <p>This is an essential new Procedure. It is required to, among other things, ensure HELI has mechanisms to address breaches of the Code, and to address Standards of the HESF 2021, especially 4.1.1e.</p> <p>This new Breaches Procedure is no different, or not much different, to many other providers' procedures in this regard. There are many examples of word for word or almost word for word adaptations from the Guidelines to the Code by providers engaged in research, and then benchmarking and adaptations leading to many similarities across research-oriented providers.</p> |