# Danish Code of Conduct for Research Integrity

## Updated version

January 2026

Danish Agency for Higher Education and Science

Published by Danish Agency for Higher Education and Science
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Publication available at ufsn.dk/english/publications

ISBN (electronic publication): 978-87-85248 24-4

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# Foreword

A high level of integrity should be a hallmark of the research process. The Danish Code of Conduct for Research Integrity provides a framework for the research community to foster common principles and standards, and it promotes a shared understanding and culture of research integrity in Denmark.

Multiple widely recognised international guidelines aimed at fostering research integrity exist. They recommend that all research institutions support a high level of integrity in their research. It is important that we do the same in Demark and promote research integrity at both national and institutional levels in accordance with these international documents.

Based on four basic principles of research integrity: honesty, transparency, accountability and respect, the Code sets out a series of commonly accepted standards for responsible conduct of research within seven main areas; a set of guidelines on teaching, training and supervision; and, finally, a set of guidelines on how to respond to questionable research practices. Together, these elements are intended to provide guidance to researchers in their day-to-day work.

Furthermore, the Code provides a common foundation for institutions to develop policies and procedures for promoting research integrity within all fields of research.

The Danish Code of Conduct is not a legally binding document. Chapter IV and Appendix 1 explain the Danish Act on Research Misconduct etc. and the recommendations for responding to questionable research practices. The Code achieves full impact when public and private research institutions integrate the document into their institutional frameworks and researchers adhere to it.

The Code encompasses all types of research, while acknowledging that the standards for responsible conduct of research are applied differently within the various research fields. This means that some recommendations may be more relevant to certain areas of research and less applicable to others. The recommendations of the Code should always be understood within the context of the established practices in the specific field of research concerned.

This edition of the Code is an updated version of the Danish Code of Conduct for Research Integrity of 2014. It has been revised in the light of developments within national and international research collaboration, Open Science, freedom of research and artificial intelligence (AI).

# I. Principles of research integrity

**The Danish Code of Conduct for Research Integrity rests on four basic principles that should apply throughout every phase of research. The four principles are honesty, transparency, accountability and respect.**

## Honesty

To ensure the trustworthiness of research, researchers should be **honest** when reporting objectives, methods, data, analyses, results, conclusions, etc

This requires accurate and balanced reporting when:

— presenting and interpreting research
— making claims based on findings
— acknowledging the work of other researchers, including the independent contributions and ideas of younger researchers
— applying for research funding
— reviewing and evaluating research

## Transparency

To ensure the credibility of scientific reasoning and to ensure that academic reflection is consistent with practice in the relevant field of research, all phases of research should be **transparent.**

This requires openness when reporting on:

— conflicts of interest
— funding
— research planning
— research methods and research data
— findings and conclusions
— contributions by and involvement of internal and external collaborating partners

## Accountability

To ensure accountability in research, all parties involved should be **accountable** for the research conducted.

This requires researchers and institutions to accept responsibility for the research they are conducting regarding:

— accuracy and reliability of research results
— compliance with all relevant regulations
— fostering and maintaining a culture of research integrity through teaching, training and supervision
— taking appropriate measures when dealing with questionable research practices

## Respect

To ensure accountability in research without breaching the fundamental principle of free and open debate on the results of the research, all parties involved should show **respect** for colleagues, research participants, research subjects and objects, society, indigenous peoples, ecosystems, cultural heritage and the environment, etc.

This requires institutions and researchers to accept responsibility for adhering to recognised norms for respectful conduct by:

— creating research environments based on mutual respect and promoting values such as equity, diversity and inclusion
— handling research participants and subjects and related data with respect and care, and in accordance with legal provisions and ethical principles
— having due regard to the health, safety and welfare of the community, of collaboraters, and others connected with their research

# II. Responsible conduct of research

**Responsible conduct of research requires everyone involved in the research process to follow high standards for conducting research. Such standards cover a wide variety of areas – from freedom of research to proper collection and management of data.**

The standards for responsible conduct of research set out in the Code are recommendations, i.e. they are not legally binding.

These standards encompass all fields of research. Some of them may not be equally relevant to every area of research, thus they need to be further developed by institutions in accordance with the specific practices within the individual fields of research.

The standards are based on common practice and are intended to help researchers and institutions to promote integrity in their research.

The Danish Code of Conduct for Research Integrity addresses basic standards for conducting research, focusing on the following areas:

1. **Freedom of research**
2. **Research planning and conduct**
3. **Research data management**
4. **Publication and communication**
5. **Authorship**
6. **Collaborative research**
7. **Conflicts of interest**

It is recommended that further specifications, policies and procedures are developed at institutional level, taking into account national and international legislation, regulations, declarations and policies. It is specifically recommended that institutions promote a culture that ensures a high level of integrity, including taking responsibility for continually informing their research staff about policies and procedures that apply to the institution. Despite the fact that the Code of Conduct is not legally binding, researchers and institutions need to be knowledgeable of and comply with a number of regulations pertaining to research, such as regulations on handling personal data (GDPR), the Danish Public Sector Information (PSI) Law, and regulations on intellectual property and on export control.

## 1. Freedom of research

Responsible conduct of research includes the recognition of and the right to freedom of research. Like many other countries, Denmark is a signatory to the Bonn Declaration (2020), which maps out the framework for freedom of scientific research, providing the basis for the notion of freedom of research in this Code of Conduct.

The Bonn Declaration stresses that freedom of research is a fundamental prerequisite for achieving scientific advances and innovation for the benefit of society. The Declaration calls for the protection of the right of researchers to freely choose topics of research, methods and publication of findings without being subjected to political or commercial pressure. Furthermore, the Declaration emphasises the importance of cultivating an environment in which researchers can work independently and without fear of censorship or oppression – essential conditions for maintaining academic integrity and credibility.

The Bonn Declaration also states that freedom of research is a freedom with responsibility in accordance with applicable legislation. Freedom of research is, among other things, safeguarded by the Danish University Act.

In keeping with the Bonn Declaration, the Danish Code of Conduct maintains that the right to freely choose areas of research should be understood in the context of the researcher's circumstances. For example, this right should be seen in relation to the researcher's employment situation, the concrete research field in which the researcher is active and the research strategy of the institution at which the researcher is employed. If a research project is financed through external funding, there may be obligations in connection with seeking and using the research funding that limit free choice of research.

Institutional management is responsible for safeguarding freedom of research. Institutions should thus have clear guidelines that set out and as far as possible guarantee freedom of research for staff members who are carrying out research

**Definitions**
*The Danish University Act*
Freedom of research is mentioned twice in the Danish University Act:

Section 2(2):
"The university has freedom of research[1]. The university must safeguard the freedom of research of the university and the individual and the ethics of science."

And Section 14(6):
"The rector may allocate specific tasks to specific staff. The academic staff has freedom of research and is free to conduct research within the university's strategic research framework during the time when they are not performing their allocated tasks. The university's strategic research framework covers the entire profile of the university. The academic staff cannot be occupied with tasks all of their working hours for an extended period of time, resulting in them, in fact, being deprived of their freedom of research."

*Bonn Declaration*
According to the Bonn Declaration (2020), freedom of research "encompasses the right to freely define research questions, choose and develop theories, gather empirical material and employ sound academic research methods, to question accepted wisdom and bring forward new ideas. It entails the right to share, disseminate and publish the results thereof openly, including through training and teaching. It is the freedom of researchers to express their opinion without being disadvantaged by the system in which they work, or by governmental or institutional censorship and discrimination. It is also the freedom to associate in professional or representative academic bodies. This includes the right to freely interact with other researchers, students, etc. in physical and digital spaces."[2]



1 Translated from the Danish University Act
2 Bonn Declaration on Freedom of Scientific Research (2020)

### 1.1 Responsibilities

i. In research, ideas and thoughts must, as a general principle, be free to be explored, discussed, and published.

ii. Researchers have the right to freely choose theory and method and to define research questions based on quality and relevance within the research field in question. If a researcher takes part in a research project with several other participants, theory and method and also research questions may be defined by the research project, therefore imposing obligations on the participating researchers.

iil. Research must be conducted in an impartial manner and academic diversity should be respected

iv. Academic criticism, including the peer review process, is a fundamental part of research since it is a prerequisite for ensuring research quality and credibility.

### 1.2 Division of responsibilities

i. **All parties involved** in the research process should take responsibility for understanding and safeguarding freedom of research.

ii. **Researchers and institutions**, when collaborating on research at home and abroad, must take preventive and counteractive measures against freedom of research being compromised

iii. **Institutions** are responsible for safeguarding individual researchers' freedom of research and for setting out clear guidelines on freedom of research

iv. **Institutions** should specifically ensure that freedom of research is not compromised by internal and external parties, including by the management of the institution, commissioning parties, political actors, funding bodies, authorities, etc. and must be particularly attentive to younger, non-tenured researchers.

v. **Institutions** should prevent censorship, including self-censorship

## 2. Research planning and conduct

Conscientious planning and conduct in research are essential prerequisites for responsible conduct of research, and are consequently fundamental to ensuring transparent and credible research. This applies to all fields of research, irrespective of the fact that research methods vary from one field to another.

Responsible conduct of research applies throughout the research process, from research planning to the reporting of results.

### 2.1 Responsibilities

i. Design, data collection and execution of the intended research, including storage and preservation of data, should be planned in compliance with established practice within the field in question and in accordance with national and international laws, regulations, declarations, strategies and policies in the field. It should involve the use of a research planning tool, e.g. a research strategy, plan, protocol or data management plan.

ii. Research should be documented in accordance with standard practice within the field in question, e.g. by keeping records, logbooks, journals or similar methods. As far as possible, the documentation should allow the research to be reexamined and, when relevant, reproduced.

### 2.2 Division of responsibilities

i. **Researchers** are responsible for planning and conducting their research

ii. Prior to commencement of the project and throughout the research process, **researchers** must obtain the necessary permits, e.g. approval from an ethics committee or an institutional review board.

iii. Neither **researchers** nor **institutions** should enter into agreements (e.g. with funding bodies, internal or external collaborating partners, commissioning parties or others) that limit access to their own data and their ability to analyse, publish and share these data, unless such access limitations can be justified by the specific circumstances.

iv. **Institutions** should have in place relevant policies for the proper management of research planning and execution and the procedures for necessary approvals and permits, and they should advise researchers on compliance with applicable regulations in the field in question.

v. **Researchers** overseeing projects that cross professional boundaries, such as citizen science, are responsible for ensuring research integrity standards, oversight, training and safeguards.[3]

## 3. Research data management

Responsible conduct of research includes proper management of primary material and data. The key purpose of data management is to guarantee credible and transparent research and to enable data to be shared and reused, if relevant.



3 All European Academies (ALLEA) (Rev. 2023). The European Code of Conduct for Research Integrity, p. 7

**Definitions**
Research data means all material, including primary material and data, on which the research is based.

Primary material means any material (e.g. biological material, laboratory notes, interviews, texts and literature, digital raw data, registered information and other documents, including computer code, audio and video recordings) that forms the basis of the research.

Data means detailed records of the primary material that comprise the basis for the analysis that generates the results.

### 3.1 Responsibilities

i. Data management plans should be drawn up that at minimum provide an overview of which research data may be made publicly accessible and how and where the data are planned to be stored and preserved.

ii. Research data and metadata should be saved, preserved and managed in a clear and accurate form in line with FAIR principles and in accordance with the necessary restrictions regarding data access. This enables data to be reused, research results to be evaluated, procedures to be followed and, when relevant and possible, research to be reproduced. The extent to which primary material and data are saved and the recommended period for saving them should always be determined on the basis of standard practice in the specific field of research and the relevant legislation.

iii. Metadata should allow identification of the people who have conducted the research and the people or institutions responsible for the data and research results. Metadata on which publications are based should contain a precise and traceable reference to the source in the form of a persistent identifier (PID). Any changes to the data should be registered in such a way that it is possible to clearly identify the changes made.

iv. Research data containing personal information may be stored for as long as needed for the purpose for which it is processed. When the purpose for which the personal information has been processed ceases to exist, the data must be deleted. As an alternative to deletion, personal information may be anonymised. The length of time for which the data are preserved should always be determined based on data protection regulations, any relevant specific legislation and standard practice in the specific field of research concerned.

### 3.2 Division of responsibilities

i. **Institutions** should have a policy for research data management that includes information on and the division of responsibilities in connection with:

   a. Storage and preservation of research data, including extent and duration of preservation and secure disposal of research data after expiry of the preservation period
   b. Responsibility for and access to research data
   c. Data preservation, accessibility and ownership when researchers leave the institution
   d. Registration and possibly transmission of research data to the Danish National Archives

ii. **Institutions** are responsible for ensuring that researchers are familiar with the data protection regulations. **Researchers** take responsibility for subsequent action.

iii. **Controllers** are responsible for evaluating, setting out and implementing regulations determining the period of time for which research data containing personal information should be preserved. A controller is a person, authority, institution or other entity.

iv. **Institutions** are responsible for providing secure data storage facilities that are in line with confidentiality and accessibility requirements and for ensuring that researchers store and preserve their research data in a responsible manner.

v. **Institutions** should, with the involvement of researchers, allow access to research data, except when this conflicts with legal obligations or applicable regulations concerning, for example, ethics, confidentiality, privacy matters, intellectual property rights or special and compelling foreign and security policy considerations

vi. **Institutions** are responsible for ensuring that research data which have been fully or partially publicly funded and which have been made accessible through institutional or subjectbased data collection may be further used for commercial and noncommercial purposes, cf. Danish PSI Law.

## 4. Publication and communication

Publication and communication are essential for the research community to be able to review and discuss research results. Thus, researchers have a right and an obligation to publish and communicate their results to the research community, to professional practitioners and to society at large. They also have a right to personally choose the relevant publication channels.

Research can be communicated through various channels, ranging from those aimed at professional peers to more popular research communication aimed at a broader audience. It is important for standards for responsible conduct of research to be respected at all times when communicating research via publications to peers in professional contexts.

### 4.1 Responsibilities

i. Research results should be published in an honest, transparent and accurate manner and the aim should be Open Access wherever possible.

ii. Publication of the same results in more than one scientific publication should only occur under clearly explained and fully disclosed circumstances.

iii. Reuse of primary material, data, interpretations or results should be clearly stated.

iv. Any restrictions on access to and analysis of data should be clearly declared to the readers of the publication. Detailed information about the role of any external research collaborating partner or funding body in relation to research design, collection, analysis and interpretation of data and publication decisions should be provided in the manuscript.

v. When using one's own work and the work of other researchers in a publication, appropriate and accurate references to such work must be provided.

vi. Use of AI in the communication and publication process should be declared in line with established national and international guidelines.[4]

vii. The right of researchers to unrestricted publication of their research, including underlying data, should be respected, except when this conflicts with contractual and/or legal obligations or applicable regulations concerning, for example, confidentiality, protection of personal data, intellectual property rights, export control regulations or special and compelling foreign and security policy considerations.

viii. Researchers should be aware of the extent to which they share their views as researchers or in a private capacity in the media or other communication channels.

### 4.2 Division of responsibilities

i. **Researchers** are responsible for publishing and communicating their research.

ii. **Researchers** are responsible for ensuring correct reference to the work of others.

iii. **Researchers** are responsible for ensuring that any omission of research results is justified and documented and that the data used in the publication are reliable.

iv. **Researchers** acting as peer reviewers and editors should carry out their review and editorial obligations honestly and without bias.

v. **Institutions** should foster and maintain an agreeable environment that promotes honesty, transparency and accuracy when communicating research results, e.g. through policies and training in publication and communication, including how to manage external criticism and opposition.

vi. **Institutions** should ensure that external collaborating partners, funding bodies, commissioning parties and other funding sources respect the obligation of researchers to publish research and research results in an honest, transparent and accurate way.

vii. **Institutions** are responsible for regular internal communication about security and foreign policy considerations that may have implications for the researchers' right to publish their research results, including underlying research data.

## 5. Authorship

Authorship has important academic, social and financial implications and plays an important part in the recognition and status of research and researchers.

Fair attribution of authorship – and appropriate acknowledgement of contributions that do not meet the criteria for authorship – contributes to the transparency and credibility of research and is thus a key prerequisite for maintaining responsible conduct of research.

Although funding sources, funding bodies, commissioning parties or external partners who have contributed financially or otherwise do not have any claim to authorship, their contributions should be clearly stated.

4 See overview of established guidelines concerning use of AI at ufsn.dk/english

## 5.1 Responsibilities

i. Attribution of authorship should be based on criteria a–d of the Vancouver guidelines[5], and all individuals who meet these criteria should be recognised as authors:

   a. Substantial contributions to the conception or design of the work, or the acquisition, analysis or interpretation of data for the work, *and*
   b. drafting the work or revising it critically for important intellectual content, *and*
   c. final approval of the version to be published, *and*
   d. agreement to be accountable for all aspects of the work in ensuring that questions related to the accuracy or integrity of any part of the work are appropriately investigated and resolved.

ii. If authorship is by a group name, all members of the group should fully meet the criteria for claiming authorship.

iii. The criteria for authorship should not be used to exclude individuals who otherwise meet authorship criteria; therefore individuals who meet criterion a should be given the opportunity to meet criteria b–d.

iv. Authors have a right to decline authorship, e.g. if they disagree with (part of) the methodology or conclusions in the publication. However substantial contributions to the work should always be noted, e.g. under acknowledgements.

v. Important work and intellectual contributions of others that have influenced the reported research but do not meet the criteria for authorship should be appropriately acknowledged.

vi. Participation solely in funding acquisition, data collection or in general research group supervision does not justify authorship.

vii. Decisions concerning publication and authorship should be agreed on jointly and should be communicated to all members of the research team. Any manuscript alterations after submission should be approved by all authors.

viii. All authors are responsible for the content of the publication. However, the responsibility of each author should be assessed in relation to their individual role in the research by considering their area of expertise, their experience and seniority, any supervisory role and other relevant factors. Thus, in some cases an author may have greater responsibility than others for ensuring the integrity of the publication or specific parts of the publication.

## 5.2 Division of responsibilities

i. **Researchers with author roles** are jointly responsible for ensuring that all persons named as authors qualify as such and for ensuring appropriate acknowledgement of contributions that do not meet the criteria for authorship.

ii. **Researchers** should address issues relating to authorship at an early stage – especially the roles of all collaborators and contributors – while recognising that roles and contributions may change during the course of the research.

5 International Committee of Medical Journal Editors (updated January 2025). Recommendations for the Conduct, Reporting, Editing, and Publication of Scholarly Work in Medical Journals.

iii. **Institutions** should have a policy on authorship attribution and how to settle authorship disputes

iv. **Institutions** should follow established national and international guidelines on the use of AI in relation to authorship[6].

## 6. Collaborative research

Research is increasingly a collaborative undertaking involving researchers, businesses, institutions, authorities and organisations from different disciplines and countries. Such collaborations can present a challenge to integrity since research cultures and perceptions of research integrity may differ across disciplines, institutions and countries.

In collaborative research it is especially important to safeguard freedom of research, impartiality and the arm's length principle and to balance the risks and gains of the collaboration.

International collaboration may involve particular ethical, financial and security risks, including loss of military or commercial knowledge or unethical use of technology, including usage in contravention of human rights.

**Definitions**
*Collaborative research* is research based on cross-disciplinary, cross-institutional and/or cross-border collaboration.

*Collaborating partners* refers to all parties involved in the collaborative research, including businesses, organisations, authorities, institutions, etc. and researchers, students, technical staff and administrative staff. The term includes collaborating partners at home and abroad.

*Arm's length principle* is "a clear and unambiguous delineation of which tasks are incumbent on each party in a collaboration, and arm's length applies when each party has full responsibility for carrying out their respective tasks. The arm's length principle ensures that the researcher is able to make independent decisions and can deliver impartial research and advice without any interference or consideration of the cooperating partner's financial or political interests.[7]"

### 6.1 Responsibilities

i. All collaborating partners should – as far as possible – take responsibility for the integrity of the collaborative research.

ii. The arm's length principle should be respected in every instance of collaborative research to ensure the independence, impartiality and integrity of the research.

6 Developments within AI are so fastpaced that the Code generally refers to currently applicable national and international guidelines in this area. See overview of established guidelines on use of AI at ufsn.dk/english

7 Universities Denmark (2021). Principles and recommendations for research-based collaboration and consultancy, p. 12 and 34

iii. Collaborating partners should – if feasible and preferably as early as possible in the research process – establish agreements on all relevant areas and specify how responsible conduct of research will be applied throughout the collaborative research process. Where appropriate, common agreements should be established on the following:

   a. Use, sharing, ownership and management of data
   b. Confidentiality
   c. Mutual acknowledgement of the arm's length principle as being fundamental to the entire collaboration
   d. Conflicts of interest
   e. Intellectual property rights
   f. Handling of potential problems relating to publication, including disclosure of research results and data
   g. Procedures for addressing conflicting laws, regulations and practices
   h. Procedures for resolving conflicts between collaborating partners
   i. Procedures for reporting and handling breaches of responsible conduct of research, including research misconduct

iv. Institutions should follow applicable national guidelines for international collaborative research, focusing on minimising ethical, financial and security risks and implementing institutionally specific procedures. Institutions are responsible for ensuring that the researchers have a clear understanding of these guidelines.

### 6.2 Division of responsibilities

i. **All parties involved** should safeguard the impartiality and integrity of research.

ii. **Researchers** are responsible for ensuring the scientific quality, including the scientific content and basis of submissions to external collaborating partners. **Collaborating partners** should support and respect the fact that **the researcher** is responsible for quality control and should acknowledge any scientific uncertainty, faithfully reporting this when disseminating results.

iii. **Researchers and institutions** should jointly identify areas in the collaborative research where common agreements may be necessary, cf. 6.1, iii.

iv. **Institutions** are responsible for providing the tools and support necessary for establishing agreements as specified above.

v. **Institutions** are responsible in the case of collaborative research – including international collaboration – for preventing possible security risks, such as unethical use of technology and espionage, and safeguarding the principles of research integrity. **Researchers** are responsible for following the institution's procedures in this regard.

vi. **Directors of institutions** are responsible for ensuring that researchers are familiar with the potential challenges and risks that can arise in both national and international collaborative research, and for setting the parameters for establishing collaboration agreements.

vii. **Institutions** are responsible for screening potential collaborating partners – including foreign partners – and for determining the extent, content and output of collaborative research. **Researchers** are responsible for contributing to knowledge about the specific research project on which there is collaboration.

# 7. Conflicts of interest

Responsible conduct of research includes disclosure of all potential conflicts of interest. This allows financial or other interests to be assessed on an informed basis to evaluate potential bias of the researcher's professional judgement.

**Definitions**
A *conflict of interest* is a situation in which financial, political or personal interests may compromise or affect impartiality in the professional evaluation and conduct of research.

## 7.1 Responsibilities

i. All parties involved in the research in question should disclose any conflicts of interest.

ii. Assessors of research and research proposals (e.g. editors and reviewers) who have a conflict of interest should withdraw from any involvement in the process

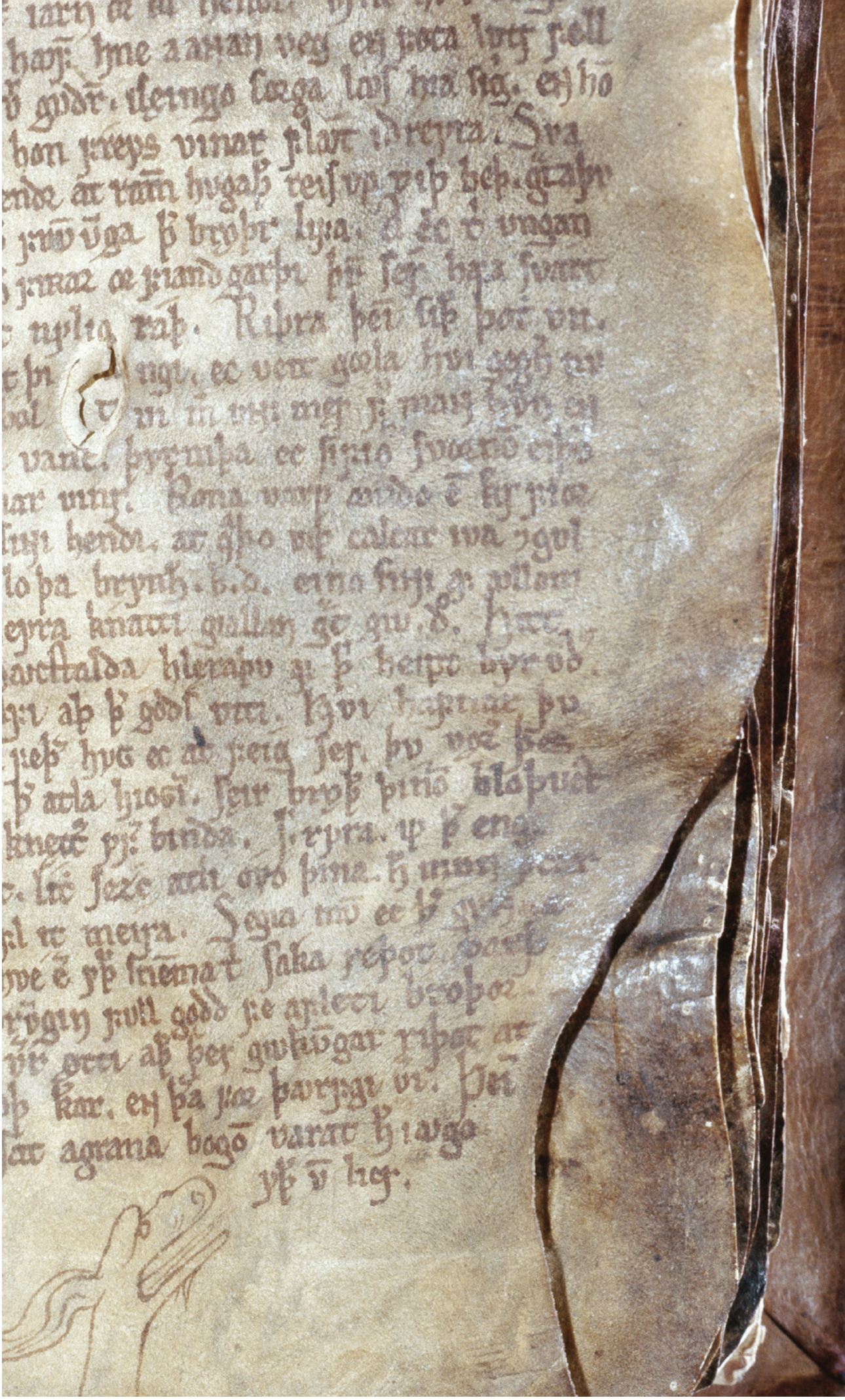
iii. All parties involved in the research in question have a joint responsibility for handling issues relating to conflicts of interest.

## 7.2 Division of responsibilities

i. **Researchers** are responsible for disclosing to relevant parties all potential and actual conflicts of interest in relation to the research they are involved in, including outside activities.

ii. **Institutions** are responsible for addressing conflicts of interest and for ensuring that all conflicts of interest are handled correctly. In this context institutions should have a policy for handling conflicts of interest which covers information about:

    a. Situations which constitute a conflict of interest
    b. Disclosure of conflicts of interest, including how to handle confidentiality issues



# III. Teaching, training and supervision in research integrity

**The Danish Code of Conduct for Research Integrity outlines basic principles for teaching, training and supervision in research integrity at institutional level.**

Fostering a culture of research integrity is a key element for ensuring high quality and integrity in research. In this context, teaching, training and supervision are essential for developing and sustaining a culture of research integrity, and for establishing and securing basic knowledge about research integrity among those involved in research.

It is important that institutions take responsibility for ensuring that researchers under their auspices receive appropriate teaching, training and supervision in the principles of research integrity and responsible conduct of research. The main aim is to incorporate the elements of research integrity into researchers' day-to-day work and to promote a mindset that supports research integrity

## 1. Teaching, training and supervision in the principles of research integrity and responsible conduct of research

Teaching, training and supervision are of pivotal importance in raising awareness of research integrity. A proactive and positive approach helps to promote research integrity.

Research leaders and supervisors play particularly important roles in research integrity teaching, training and supervision.

**Definitions**
*Research leaders* are individuals with overall professional academic responsibility for the research carried out.

*Supervisors* are experienced researchers providing guidance for students and less experienced colleagues.

## 1.1 Responsibilities

i. Principles of research integrity and responsible conduct of research should be part of all research undertakings and firmly anchored in the entire research process

ii. Everyone involved in the research process should promote and maintain an environment that fosters research integrity, where the fundamental values of research integrity are emphasised and routinely practised.

iii. Research integrity teaching, training and supervision should cover:

   a. Principles of research integrity
   b. Responsible conduct of research, including data management
   c. Rules and principles for authorship
   d. Freedom of research and what it means
   e. Principles and recommendations for national and international collaborative research
   f. Research misconduct and questionable research practices, including procedures for responding to suspected malpractice
   g. Relevant regulations

iv. Bachelor's and master's programmes should include an introduction to the principles of research integrity and responsible conduct of research.

v. Technical and administrative staff should receive specific research integrity teaching and training.

vi. PhD and postdoctoral programmes should include specific research integrity teaching and training, including data management according to FAIR principles.

vii. Research leaders and supervisors should receive specific research integrity teaching and training to support their mentoring roles in fostering a culture of research integrity.

## 1.2 Division of responsibilities

i. **Research leaders** and **supervisors** should act as role models and manage research under their auspices in accordance with principles of research integrity and responsible conduct of research.

ii. **Research leaders** and **supervisors** should nurture a culture of research integrity, responsible conduct of research and mutual respect.

iii. **Supervisors** should take measures to ensure that the research carried out by researchers, research trainees and students under their supervision is conducted in accordance with the principles of research integrity and responsible conduct of research.

iv. **Institutions** are responsible for ensuring that all staff (including guest researchers) and students involved in research have sufficient knowledge of and receive training in the principles of research integrity and responsible conduct of research.

# IV. Research misconduct and questionable research practices

**The Danish Act on Research Misconduct etc. provides the framework for handling cases of research misconduct and instances of questionable research practices. The Danish Code of Conduct for Research Integrity sets out additional recommendations for addressing questionable research practices.**

To maintain confidence in research, including the scientific communities' own confidence in research and the public's perception of the trustworthiness of research, it is important to bring to light and properly address instances of questionable research practices and research misconduct. The Danish Code of Conduct for Research Integrity contains principles and standards for responsible conduct of research which further our understanding of the notion of questionable research practices.

The Danish Act on Research Misconduct etc. stipulates that the central national authority for misconduct, the Danish Board on Research Misconduct, processes all cases concerning research misconduct, while instances of questionable research practices are handled by the research institution involved. The Act requires individual research institutions to draw up guidelines for how they should respond to instances of questionable research practices. These guidelines must be published on the individual institution's website.

Institutions and researchers share a responsibility for acting and taking appropriate measures when encountering questionable research practices.

Appendix 1 outlines recommendations for how institutions should deal with instances of questionable research practices. Institutional systems are intended to co-exist with the Danish Board on Research Misconduct. The recommendations set out a number of basic guidelines for institutional systems for addressing instances of questionable research practices; however, the implementation of specific processes is a matter for each individual institution.

## 1. Questionable research practices

To ensure high integrity in research, all parties involved should be aware of their responsibility for dealing with instances of questionable research practices. Institutions and researchers should thus support initiatives for handling questionable research practices.

**Definitions**
Questionable research practices are defined in Section 3(1)(5) as:
*"Violation of generally accepted standards for research practices, including standards in the Danish Code of Conduct for Research Integrity and other applicable institutional, national and international practices and guidelines for research integrity."*

### 1.1 Responsibilities

i. All parties involved in the research share responsibility for ensuring that suspicions concerning questionable research practices based on reasonable grounds are put forward in good faith and are properly addressed.

ii. Systems for addressing these matters should be clearly described and easily accessible

### 1.2 Division of responsibilities

i. **Researchers** and **institutions** are responsible for creating and maintaining an environment where it is acceptable to raise any reasonable suspicion of questionable research practices..

ii. **Researchers** are responsible for supporting the handling of such allegations.

iii. **Institutions** are responsible for ensuring that a system is in place at institutional level for addressing any reasonable suspicion of questionable research practices.

iv. **Institutions** should have a policy that describes their system for addressing suspicions of questionable research practices, including:

   a. Where and to whom a person can turn for advice concerning a reasonable suspicion of questionable research practices
   b. The step-by-step procedure for addressing such a suspicion
   c. The possible outcomes of an investigation
   d. The sanctions that may be imposed at institutional level
   e. Dealing with suspicions that involve research or staff from other institutions, including institutions abroad
   f. Other relevant information

**Danish Board on Research Misconduct**
The Danish Board on Research Misconduct is a central independent body established by law. The Board is tasked with handling cases of research misconduct in scientific products. Research misconduct is defined in Section 3(1)(1) as follows:

"Research misconduct: *Fabrication, falsification and plagiarism committed wilfully or with gross negligence when planning, performing or reporting on research.*"

Matters of research misconduct may be raised by anyone by reporting them to the research institution at which the research is being carried out. The research institution is obliged to forward the matter to the Board if there is a valid basis for suspecting research misconduct of the type that falls within the remit of the Board.

The Board also has the option of taking up the matter at its own initiative.

Further information on the Board and the Board's mandate is available on the website of the Danish Agency for Higher Education and Science: ufsn.dk/english

# Appendix 1. Recommendations for responding to questionable research practices

**A prompt and effective response to suspected questionable research practices is necessary to maintain general confidence in research, including the scientific community's own confidence in research and the public's perception of the trustworthiness of research.**

It is incumbent on research institutions to draw up and publish guidelines on how they respond to questionable research practices, including guidelines on forwarding cases of suspected research misconduct to the Danish Board on Research Misconduct.

Institutional systems and procedures should at minimum comprise the elements outlined below to ensure that any suspicion of questionable research practices is handled coherently and effectively at institutional level.

## 1. Preliminary advice on suspected questionable research practices

Anyone with reasonable grounds for suspecting questionable research practices should have the opportunity to request personal, impartial and professional advice concerning the suspicion, e.g. from a 'named person' or similar.

In cases of suspicion based on reasonable grounds, the case is submitted for further investigation in accordance with institutional procedures and the parties of the case are informed.

## 2. Investigation of a reasonable suspicion

When handling and investigating suspected cases of questionable research practices, the general principles for the exercise of public authority and the principles below must be considered [8]:

a. The individuals who are involved in handling the suspicion and who conduct the investigation must be impartial.
b. It is advisable for the individuals conducting out the investigation to have research expertise within the specific fields of research and to have extensive knowledge of responsible conduct of research. If possible, one or more of them should have previous experience with cases of research misconduct and/or questionable research practices.
c. Allegations made in bad faith only (harassment) should themselves be regarded as instances of questionable research practices.
d. Cases should be concluded in an effective manner, in such a way that no individual is part of an investigation for longer than strictly necessary.

8 The recommendations for institutional systems for addressing instances of questionable research practices are interpreted in accordance with Danish legislation, including Danish administrative law regarding the status of the parties to the case, access to information, etc.

The investigation must be concluded by determining whether questionable research practices have occurred.

If there are reasonable grounds for suspecting research misconduct, the institution must, as soon as the suspicion is established (the case, moreover, must include the information specified in Section 11(1) of the Danish Act on Research Misconduct), submit the case to the Danish Board on Research Misconduct to be processed[9]. Thus, it is not necessary to wait until the allegations of questionable research practices have been investigated before submitting the case to the Board. It is advisable for the institution to start a dialogue with the secretariat of the Board before forwarding the case, if relevant.

## 3. Conclusion of investigation and disciplinary action

If the institutional investigation concludes that questionable research practices have occurred, the onus is on the institution or institutions at which the research has been conducted out or the researcher in question is employed to take relevant disciplinary action.

**9** Danish Act on Research Misconduct etc. Section 10(1), cf. Section 11(1) and Section 10(3)

# Appendix 2. Bibliography

**The Danish Code of Conduct for Research Integrity was developed in 2014 with inspiration from various initiatives from Danish universities and sector research institutes in Denmark and from the following list of international initiatives and sources, which was extended to include new references when the Code was updated.**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# Appendix 3. Focus when updating the Code, and members of the Committee

## Focus when updating the Danish Code of Conduct for Research Integrity.

Since the Danish Code of Conduct for Research Integrity was published in 2014, new developments in the research world have emerged that have made it necessary to bring it up to date. In early 2024 the Ministry of Higher Education and Science duly set up a committee to revise the Code. The Committee has held five meetings – four in 2024 and a final meeting in 2025. In its work on revision of the Code, the Committee has taken stock of new developments and guidelines within five specific focal areas: (1) collaborative research and consultation, (2) international collaboration and security risks, (3) Open Science, including FAIR research data, Open Access and Citizen Science, (4) freedom of research, and (5) AI

## Members of the Committee

The Committee comprises 22 members, including the chairperson and an observer. The members are representatives from Danish education institutions engaged in research activities, foundations and other relevant organisations with a stake in research:

**Alan Irwin**, Professor, appointed by the Royal Danish Academy of Sciences and Letters
**Anne-Marie Engel**, Chief Scientific Officer, LEO Foundation, representative for private foundations
**Anne-Mette Hvas**, Dean, appointed by Aarhus University
**Annemarie Falktoft**, Deputy Director, Danish Agency for Higher Education and Science (chairperson)
**Benjamin Dante**, PhD student, appointed by PhD Association Network of Denmark
**Børge Lindberg**, Investment Officer, appointed by Innovation Fund Denmark
**David Dreyer Lassen**, Rector, appointed by University of Copenhagen (with Deputy Director Kim Brinckmann at the fifth meeting)
**Iben Fonnesberg-Schmidt**, Deputy Head of Department, appointed by Aalborg University
**Jesper von Seelen**, Head of Research, appointed by Universities of Applied Science Denmark
**Jonas L. Pedersen**, Senior Adviser, appointed by Universities Denmark (observer)
**Klaus Petersen**, Professor, appointed by Independent Research Fund Denmark
**Klemens Kappel**, Professor and Board Member, appointed by the Danish Board on Research Misconduct
**Kristin B. Munksgaard**, Vice Dean, appointed by University of Southern Denmark
**Lone Malmborg**, Head of Department, appointed by IT University of Copenhagen (with Head of Research Morten Hjeltholt at the fifth meeting)
**Lotte Jensen**, Director, appointed by Sektorforskningens Direktørkollegium (Organisation of directors of sector research institutes)
**Marie Birk Jørgensen**, Head of Research, careers and relations, appointed by Danske Erhvervsakademier (Danish organisation of business academies)
**Mathias Wullum Nielsen**, Associate Professor, appointed by The Young Academy
**Morten Andreasen**, Senior Advisor, appointed by the Danish National Research Foundation
**Nicolaj Tofte Brenneche**, Head of Research Administration, appointed by De Kunstneriske og Kulturelle Uddannelser (Artistic and cultural education programmes)
**Peter Kjær**, Prorector, appointed by Roskilde University
**Rasmus Larsen**, Prorector, appointed by Technical University of Denmark
**Søren Hvidkjær**, Dean of Research, appointed by Copenhagen Business School

**Secretariat of the Research and EU office at the Danish Agency for Higher Education and Science:**

**Ditte Mesick,** Head of Unit
**Hanne-Louise Kirkegaard**, Senior Adviser
**Naimah Hussain,** Special Adviser

# Appendix 4. Glossary

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| **Arm's length principle** | A clear and unambiguous delineation of which tasks are incumbent on each party in a collaboration. Arm's length applies when each party has full responsibility for carrying out their respective tasks[10]. |
| **Artificial intelligence (AI)** | Systems based on algorithms that can identify solutions or generate answers to queries by analysing and finding data patterns. Some systems (often called generative AI) can generate answers to queries irrespective of the area of knowledge. The technology can adapt its behaviour by observing the effect of the solutions and answers it has previously produced on its environment[11]. |
| **Citizen Science** | Various activities, projects and networks that bring together researchers and volunteers around one or several common goals[12]. |
| **Collaborative research** | Research based on cross-disciplinary, cross-institutional and/or cross-border collaboration. |
| **Commissioned research** | A category of research-based cooperation. It may include contract research, development tasks and research-based consultancy without central research interest to a university[13]. |
| **Conflict of interest** | A situation in which financial, political or personal interests may compromise or affect impartiality when it comes to professional judgement and execution of the research. |
| **Controller** | The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data[14]. |
| **Danish PSI Law** | Lays down minimum uniform rules for the commercial and non-commercial reuse of documents and data collections that are in the possession of public authorities[15]. |

**10** Universities Denmark (2021). Principles and recommendations for research-based collaboration and consultancy, p. 34
**11** Website of the Agency for Digital Government
**12** Torben Esbo Agergaard, Gitte Kragh and Kristian Hvidtfelt Nielsen (2020). Citizen Science i Danmark projekter, litteratur og aktører [Citizen Science in Denmark, projects, literature and actors]
**13** Universities Denmark (2021). Principles and recommendations for research-based collaboration and consultancy
**14** GDPR, Article 4(7)
**15** Danish PSI Law (LBK no. 1764 of 26/08/2021)

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| **Data management plan (DMP)** | A plan that is typically drafted at the start of a project and describes the actions to be taken to collect, process, store, secure, share, preserve and possibly reuse research data in a research project. DMPs are good tools to align expectations between researchers and are increasingly required by funders and institutions. Researchers can draft their own plan or use existing templates, such as those provided by their research funder or institution[16]. |
| **Data set** | A structured collection of research data[17]. |
| **FAIR principles** | A set of guiding principles to make research data findable, accessible, interoperable and reusable (Wilkinson et al., 2016, DOI: 10.1038/sdata. 2016.18). Researchers must follow the FAIR principles when sharing data with others within the framework of their research disciplines ('as FAIR as possible'). This helps to maximise reuse of data across technical, geographical and disciplinary boundaries, facilitates collaborative research and positively influences research impact.<br><br>**F** for findable implies providing searchable evidence that a data set exists, even when the data set is not openly accessible.<br><br>**A** for accessible means giving information on how access can be given to data sets that can be shared through open access repositories or other methods<br><br>**I** for interoperable implies as far as possible using common standards and/or vocabulary for file formats, metadata and data documentation so that others can open the data sets, work with them and combine data from similar projects.<br><br>**R** for reusable means providing the necessary information to allow the context in which a data set was produced to be understood, as well as to communicate terms for its reuse[18]. |
| **Freedom of research** | The right to freely define research questions, choose and develop theories, gather empirical material and employ sound academic research methods, to question accepted wisdom and bring forward new ideas. It entails the right to share, disseminate and publish the results thereof openly, including through training and teaching[19]. |
| **Funding bodies** | Funds, public institutions or businesses that fund research. |
| **Funding sources** | Funds, public institutions or businesses that fund research. |
| **Institutional data collection** | Data collected and stored by a specific institution, typically a research institution or university. These data are generally generated by the institution's own research activities and stored in the institution's own repository (database or data repositories). |
| **Metadata** | Data describing other data, e.g. identification, description/documentation, origin, licence, etc[20]. |

**16** University of Copenhagen (2022). Policy for Research Data Management, p. 9
**17** Ditto
**18** Ditto
**19** Bonn Declaration on Freedom of Scientific Research (2020)
**20** DeiC (2021). National Strategy for Data Management based on FAIR, p. 22

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| **Named person** | Can be someone tasked with advising staff who would like guidance on research misconduct and questionable research practices. |
| **Open Access** | Free digital access for all via the internet to scientific articles and conference proceedings in journals and proceedings with an International Standard Serial Number[21]. |
| **Open Science** | According to UNESCO's Recommendation on Open Science, open science is a set of principles and practices that aim to make scientific research from all fields accessible to everyone for the benefit of scientists and society as a whole. The Recommendation aims to ensure not only that scientific knowledge is accessible but also that the production of that knowledge itself is inclusive, equitable and sustainable[22]. |
| **Persistent identifier (PID)** | A long-lasting reference to a document, file, website, or other object. In the context of FAIR data, a persistent identifier is an unbreakable and actionable link associated with a digital object on the internet. Examples of persistent identifiers are Digital Object Identifiers (DOIs) typically used for journal articles and data sets, and Open Researcher and Contributor IDs (ORCIDs) to identify authors of scholarly work[23]. |
| **Personal data** | Data relating to persons who can be identified directly or indirectly using those data. Examples are images, names or references to personal identification numbers or economic, social, cultural, physical, physiological or mental characteristics[24]. |
| **Personal information** | Any type of information that can be attributed to a specific person, even if it is only possible to identify the person if the information is combined with other information[25]. |
| **Preservation** | Long-term measures to ensure that the data remain intact, accessible and usable over time. This can include archiving data, using secure formats, documenting and ensuring that the data are properly organised and protected against loss or expiry. |
| **Primary material** | Any material (e.g. biological material, laboratory notes, interviews, texts and literature, digital raw data, registered information and other documents, including computer code, audio and video recordings) that forms the basis of the research. |
| **Processor** | A natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller – i.e. according to instructions given by the controller[26]. |
| **Research data** | All material, including primary material and data that underpin the research. |
| **Research data management** | A collective term for the planning, collecting, processing, storing, securing, sharing and archiving of primary material and research data[27]. |

**21** Ministry of Higher Education and Science (2018). Denmark's National Strategy for Open Access
**22** UNESCO (2021). Recommendation on Open Science
**23** University of Copenhagen (2022). Policy for Research Data Management, p. 11
**24** University of Copenhagen (2022). Policy for Research Data Management, p. 11
**25** Website of The Danish Data Protection Agency
**26** Ditto
**27** Copenhagen University (2022). Policy for Research Data Management, p. 10

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| **Researcher** | A person who is a PhD student, has a PhD degree or has equivalent or higher qualifications[28]. |
| **Research leader** | Have the overall professional academic responsibility for the research being conducted. |
| **Research misconduct** | Fabrication, falsification or plagiarism that has been committed intentionally or with gross negligence in the planning, execution or reporting of research[29]. |
| **Research results** | Conclusions made from research data[30]. |
| **Respect** | A feeling or understanding that someone or something is important, serious, etc. and deserves appropriate treatment or regard[31]. |
| **Scientific product** | Obtained by means of scientific methods as part of research, including research funding applications. |
| **Storage** | The immediate, active step of saving data on a physical or digital device (e.g. hard disc, server or cloud service). It is about ensuring that the data are accessible for use, analysis and further processing during the research process |
| **Supervisor** | Experienced researcher providing guidance to students and less experienced colleagues. |
| **Topic-based data collection** | A collection of data organised and made accessible according to specific research fields or topics. These collections of data are often more specialised and focus on collecting data within a certain research field, which means they are particularly useful for researchers working within that specific area. |
| **Questionable research practices** | Violation of generally accepted standards for responsible research practices, including the standards in The Danish Code of Conduct for Research Integrity and other applicable institutional, national and international practices and guidelines for research integrity[32]. |

28 Act on Research Misconduct etc. (Act no. 383 of 26/04/2017)
29 Ditto
30 Ditto
31 Merriam-Webster
32 Act on Research Misconduct etc. (Act no. 383 of 26/04/2017)

Danish Agency for Higher
Education and Science