



Policy Consultation Feedback

Date: 21 April 2026

To: Research & Enterprise [research-enterprise@unimelb.edu.au]

Subject: Feedback to the MPF13XX - Managing Potential Breaches of the Australian Code for the Responsible Conduct of Research Procedure

The UMSU Advocacy Service welcomes the opportunity to provide feedback on a procedure that will likely impact the graduate research community.

Overall, our service endorses the proposed changes, which focus on promoting the responsible conduct of research and acknowledge that this is a shared responsibility between staff and graduate researchers alike. As an independent student organisation, we recognise the importance of robust research integrity, and we support mechanisms that enshrine principled processes that identify and address genuine risk.

However, we are concerned that in its current form, the Procedure does not fully anticipate power imbalances that graduate researchers may experience with their advisory and supervisory team and provides limited protections to address these.

Power Imbalances and Mandatory Reporting

Section 2.2 of the Draft Procedure imposes notification obligations on all graduate researchers. For graduate researchers who are dependent on supervisors for progression (which may be linked to funding, visas and providing references for future employment), this creates a significant dilemma.

Although the [Appropriate Workplace Behaviour Policy \(MPF1328\)](#) provides protections against victimisation and detrimental actions against complainants and disclosers, this is not sufficient. The protections in the *Appropriate Workplace Behaviour Policy* are reactive rather than preventative, complaint-driven (requiring the graduate researcher to initiate another process) and usually narrowly interpreted.



In contrast, research integrity retaliation against graduate researchers is often informal (expressed through loss of opportunities, hostile supervision and subtle exclusion) and difficult to evidence after the fact.

Explicit procedures before harm occurs would allow for expectations to be well-set, signal to decision-makers that retaliation risks must be actively managed and reduce the burden on graduate researchers to prove harm later.

The inclusion of enforcement mechanisms within the Procedure would ensure that power imbalances are acknowledge and addressed early on.

Recommendation 1

We recommend that the Procedure include explicit anti-retaliation protections for student notifiers with the option of confidential (not merely anonymous) reporting through independent channels. Additionally, we recommend that the Procedure should clearly outline that failure to report will not be presumed where students reasonably fear harm. This will signal to decision-makers that such risks should be actively managed and may reduce the burden on students to prove harm later.

Withholding Notification of a Decision to Conduct a Preliminary Assessment or an Investigation

In Part 4 of the Draft Procedure, sections 4.1.2 and section 4.2.8 carve out discretionary powers that allow the Associate Director, Research Integrity or a Designated Officer to withhold giving notice to a respondent of the decision to conduct a preliminary assessment or investigation. We understand the need for this carve out and support its inclusion but remain concerned that this may affect graduate researchers disproportionately.

Graduate researchers occupy a fundamentally different position to staff researchers. Their progress, funding, supervision, authorship (and where appropriate, visa status), are often controlled by a small number of individuals, frequently including the very persons who may be involved in an assessment or investigation.

Where notice of a preliminary assessment or investigation is withheld, graduate researchers may experience unexplained supervisory behaviour changes, delays or withdrawal of support, which may have indirect academic consequences before any findings are reached.



Moreover, this discretionary threshold is broad and undefined. Both sections rely on the formation of a “reasonable belief” which is not coupled with a requirement to consider the graduate researcher-specific impacts.

Recommendation 2

We recommend that sections 4.1.2 and section 4.2.8 be amended to require decision-makers to consider whether risks can be managed through targeted measures (such as data preservation, document sequestration, safety planning) without withholding notice entirely.

We also recommend the inclusion of a requirement that decision-makers explicitly consider impacts on candidature milestones and timelines, visa status where appropriate, funding continuity and supervisor-graduate researcher dependency before withholding notice from graduate researchers.

Limited Access to Representation and Support

Although the Procedure references the UMSU Advocacy Service in Part 6 of the Procedure, this is only at the penalty stage. Support for graduate researchers is not guaranteed or embedded earlier in the process.

Including explicit rights to advice from an independent student organisation which has trained staff that are professionally indemnified is important even when general references to “support persons” already exist because this access to independent advice performs distinct procedural and equity functions that are essential in a research integrity context (especially for graduate researchers).

Recommendation 3

We recommend that the Procedure include a presumptive right to an advocate from an independent student organisation at all stages and that even at the preliminary assessment stage, graduate researchers should be given a proactive referral to advocacy services.

Appeals and Procedural Fairness

Under Part 8 of the Draft Procedure, appeal rights are confined to procedural fairness, excluding review of factual findings or proportionality of outcomes. For graduate researchers, especially those found to have engaged in research



misconduct, this is deeply inadequate given the gravity of potential sanctions. In most regulatory and administrative contexts, such outcomes are ordinarily accompanied by merits-based appeal rights (not merely a procedural review). A procedural fairness review cannot correct factual errors such as the misinterpretation of evidence, the drawing of unreasonable inferences and the inability to properly contextualise graduate researcher conduct. Access to a merits-based appeal process ensures factual accuracy, consistent treatment and proportional outcomes.

Additionally, section 8.1.3 (c) only allows graduate students 10 University business days to make an application for a procedural fairness review. This places an immense burden on graduate researchers, who may be simultaneously dealing with the emotional impact of serious findings, threats to candidature or visa status, and the practical challenges of understanding complex procedural grounds for review.

Recommendation 4

We recommend that the Procedure be amended to broaden appeal rights beyond procedural fairness where findings of graduate researcher misconduct may result in severe sanctions. In such cases, graduate researchers should have access to a merit-based appeal framework on clearly defined grounds, including material errors in fact, unreasonable or unsupported findings, disproportionality of penalties and the emergence of new information.

Recommendation 5

We recommend that the Draft Procedure be amended to allow graduate researchers 20 University business days to lodge a review (appeal).