Ref. No. 78/RVIM/MBA/2023-24

Date: 22/05/2023

To,

The Director, RV Institute of Management,
Bangalore

From,
Dr. Padmalini Singh
Convener, Centre for Research Consultancy & Extension,
RV Institute of Management, Bangalore

RASHTREEYA SIKSHANA SAMITHI TRUST
No: 981
Date: 22.5.23

R.V. INSTITUTE OF MANAGEMENT
No. 91
Year 2023-24
Date 7/7/2023
4th 'T' Block, Jayanagar, Bangalore-41

Dear Sir,

Subject: Request for approval of Research Ethics Policy and Research Ethics Review Board (RERB)

This is to your kind consideration that as we intend to start autonomous PhD programme and also in response to recommendations made by all national and international regulatory bodies that the educational institution must create and adopt Ethics Research Policy and constitute Research Ethics Review Board to support the ethical commitments to intellectual freedom and research excellence, RVIM have drafted the Research Ethics Policy that is attached to the letter for your kind perusal. The Research Ethics Review Board constitution includes:

- Chairman - Director (1)
- Member Secretary - Convener of the Research Centre (1)
- Members - Any Two Senior faculty members as nominated by the Director (2) and three external members (3)

Proposed Members of Research Ethics Review Board for Term (2023-26)

1. Dr. Purushottam Bung: Chairperson
2. Dr. Padmalini Singh: Convener, Centre for Research and Consultancy

INTERNAL MEMBERS

3. Dr. Noor Firdoos Jahan: Internal Member
4. Dr. Tamizharasi: Internal Member

EXTERNAL MEMBERS

5. Dr. Lakshmi Arya Thathachar (History and Philosophy): External Member (Associate Dean- Research and Associate Professor, School Of Law, RV University).
6. Dr. Anjana Reddy (Legal Expert): External Member (Principal, RV Institute of Legal Studies).
7. Dr. Keerthi Kishore S. (Applied Psychology): External Member (Assistant Professor, School Of Liberal Arts and Sciences, RV University).

As a good practice followed by most of the institutions we would like to pay Rs. 3000/- as seating charges.

We seek your suggestions and approval for the same.

With regards,

Yours Sincerely,

Dr. Padmalini Singh
Convener, Centre for Research Consultancy & Extension, RVIM

Forwarded to Honorary Secy Sir, RSST

We would like to form RERB and adopt Ethics Research Policy as well. After consulting various Instts including RVU & other experts we have drafted the policy & planning to constitute a profession Board. We will be paying Rs. 3000/- as sitting charges to the external members only.

- Perused the proposal of RUIM dt. 22/05/23 w.r.t Research Ethics & Review Board.
- We may approve the Policy and the Review Board as requested by the Commerce & the Director.
- We may also approve ₹ 3,000/- as sitting fee for the external members.
- It is also suggested for inclusion of the following in the Research Policy after review by the Internal Committee:
  1. Conflict of Interest
  2. Grievance Redressal Mechanism.
- Submitted for approval please.

Approved
05/07

05/07/23

Hon. Secretary
D. RSST

Director/RUIM: for u/a please.

06/07

RASHTREEYA SIKSHANA SAMITHI TRUST
No: 2016
Date: 6.7.23

A.S. + A/c + AO
For compliance & rollout
7/7

RV Institute of Management

RVIM RESEARCH POLICY

According to the ICMR guidelines (2017) for biomedical and health research, Guidance Document on Good Academic Research Practices by the UGC (August 2020), UGC (Promotion of Academic Integrity and Prevention of Plagiarism in Higher Educational Institutions) Regulations 2018, the International Committee of Medical Journal Editors (ICJME) recommendations on defining the role of authors and contributors and the best practices followed by several institutions, RVIM have charted a Research Policy Documents to enhance awareness about the responsible conduct of research and academic activities, to promote academic integrity and to prevent plagiarism. This document defines general principles and standards that must be adhered to in order to ensure ethical practices in RVIM.

Principles of Ethical Research

RVIM adopts the following principles in ethical research:

a) **Objectivity**: Consciously upholding the values of being independent and true and avoiding individual subjectivity in research.

b) **Integrity**: The researcher must avoid plagiarism, fabrication, falsification, ghost authorship, and guest authorship and must maintain good practices for authorship in collaborative work.

c) **Confidentiality**: The researchers must respect the privacy, autonomy, diversity, values, and dignity of research subjects and must be very sensitive while disclosing the information and data of public interest by ensuring the privacy and confidentiality of the source of information.

d) **Transparency**: The researchers must be as open as possible with respect to the decisions made and provide justifications for their actions.

e) **Honesty**: The researchers must possess an unbiased and honest attitude in knowing and stating the truth in research.

f) **Informed consent**: The researcher must inform the subjects about the study, emphasize the option available to subjects to participate, and obtain their consent before carrying out the study.

05/04/23

g) **Full disclosure**: The researcher must disclose the sources of funding, information of the institution and researchers conducting the study, and conflicts of interest if any.

h) **Social responsibility**: The researcher must share the research with participants and with the broader research community.

i) **Welfare of animal subjects**: The researcher must maintain three R's ie., (Replacement of animals with other methods if possible, Reduction of the number of animals used, and Refinement of techniques to reduce the impact on animals), minimization of pain and suffering to animal subjects, use of invasive methods of sample collection where possible, minimized human interaction to reduce stress and disease to the animal populations.

Ethical consideration of research with Human Subjects

1. Privacy, anonymity, and confidentiality of participants to be safeguarded and undue intrusions must be avoided.

2. Safeguard autonomy, rights, and dignity of research participants.

3. Principle of voluntariness according to which participants are free to join in the study or not at any time.

4. Preventing harm and reducing participant risk.

5. Increasing direct or indirect benefits to participants and society

6. Professional responsibility: The research must be planned, conducted, evaluated, and monitored by persons with appropriate qualifications, experience, and training. Honesty, integrity, openness, carefulness, non-discrimination, and avoiding bias are the professional responsibilities of researchers.

7. Informed consent

a) Participants must be made aware of the purpose and aims of the research

b) Emphasizing the option available to subjects to participate

c) Full disclosure: Sources of funding, information of institutions and researchers conducting the study, and conflicts of interest must be disclosed to participants.

8. Storage of data: Data must be stored responsibly so that the privacy and confidentiality of participants are maintained. In order to allow for later studies to be compared with the study, complete records of data must be maintained in a clear and complete manner by the researcher.

9. Environmental protection at all stages of research

10. Transparency and accountability whereby research plans and outcomes are shared in the public domain, with participants, and with the broader research community. Privacy and confidentiality of participants are to be safeguarded.

11. Social responsibility: Conducting research that is factually accurate and socially sensitive.

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Research misconduct

Research misconduct is typically defined as any violation of the Research Ethics Policy, regardless of whether it was intentional, careless, or negligent.

1. **Plagiarism:** Without correctly citing the source, using quotation marks when necessary, or providing a suitable citation, which includes pasting data from an electronic text, when copying material verbatim from a source. All research conducted by students, faculty, and staff must be based on original ideas, and violations of the University Grants Commission (Promotion of Academic Integrity and Prevention of Plagiarism in Higher Educational Institutions) Regulations, 2018, which prohibit plagiarism in higher education institutions, are exempt from punishment for similarity checks up to 10%.
    - • If there are similarities between 10% and 40%, the student must submit a rewritten script within a given time limit of no more than six months. The author will be requested to withdraw the manuscript for academic and research publications.
    - • If there are similarities between 40% and 60%, the student will be prohibited from submitting a revision for a year. If the paper is published, the author will be asked to withdraw it, will lose the right to one yearly increment, and will have to wait two years before being permitted to supervise any new Masters, MPhil, or PhD students.
    - Registration for a student will be cancelled if there are similarities of more than 60%. In the case of research publications, this will result in the author withdrawing the paper, giving up the right to two consecutive yearly increments, and preventing them from supervising any new Masters, MPhil, or PhD scholars for three years.
2. **Authorship:** Authorship requires making significant contributions to the conception of the research, the collection and analysis or interpretation of data, and the writing and editing of the publication.
3. **Fabrication:** Fabrication means falsifying or misusing data including presenting falsified data in a paper, manuscript, or presentation and making up a source for a citation.
4. **Falsification:** Falsification is manipulating research materials, equipment, or processes, or changing or omitting/suppressing data or results without scientific or statistical justification, such that the research is not accurately represented in the research record.

All authors are required to give their final approval of the version to be published. Authors are accountable for all aspects of the work. Unacceptable authorship misconduct is:

a) Guest authorship: When those that have not contributed to the article are 'gifted' authorship. Guest authorship is typically given with the objective of increasing the probability of acceptance by a journal. This may be linked to ulterior motives such as promotions or other favors.

05/04

b) Ghost authorship: When the original author of an article is not mentioned in the list of authors.

a) Denial of authorship for the substantial contribution of work.

b) Best practices for authorship in collaborative work

According to the International Committee of Medical Journal Editors [ICJME], Authorship is defined by four precise criteria below:

- Significant contributions to the conception or design of the work; or the acquisition, analysis, or interpretation of data for the work; AND
- Drafting or revising the work critically for important intellectual content; AND
- Final approval of the version to be published; AND

Consent to take responsibility for all aspects of the work in order to guarantee that any concerns about the accuracy or integrity of any portion of the work are duly investigated and addressed. Before starting the work, a large multi-author group should decide who the authors would be, and then they should confirm this as well as the author order before submitting the paper for publication. The aforementioned qualifications for authorship should be met by all authors mentioned.

Research Conduct

Ethical responsibilities: In experimental research initiatives, the project is often led by a Principal Investigator (PI) and a group of Co-PIs. They should take extra care to make sure that researchers are properly supervised and mentored. When interacting with researchers and students, research supervisors should conduct themselves with the highest ethical standards. Potentially problematic issues should be recognized and resolved as soon as feasible in a fair and transparent manner.

Despite the foregoing, everyone involved in a research project is accountable for their own behaviour and should ensure that it adheres to and upholds high ethical standards. The argument that they were acting unethically because they were following a mentor's directions cannot be supported.

Data management: It is necessary to take precautions to store all collected research materials, including physical and visual data, in a secure location. For experimental work in particular, producing correctly recorded raw data is necessary for defending the publication. Usually, its absence will be seen suspiciously. A well-maintained document offers future publications not only a permanent record of the findings and procedures but also crucial support for the assertion of priority in the case of patent applications and evidence of compliance with the necessary ethical standards. It is unacceptable to alter or manipulate records in recorded documents.

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Participants should be made aware of how research information should be handled and how long it will be kept as part of the informed consent procedure.

Ownership: Unless explicitly decided otherwise, physical materials from research conducted at RVIM, such as notebooks, data sets, etc., will remain the property of the organization. The same is true for commercially valuable software and processes.

Responsible use of funds: An appropriate and effective use of resources should be ensured through open and equitable procedures. Funding cannot be used for any other goals than those listed in the grant award, according to researchers.

Sharing of facilities: As long as such access does not interfere with the original purpose for which the equipment was purchased, RVIM equipment is intended to be shared in a cooperative manner with colleagues who need access for their own study. As long as sharing is actively allowed and open protocols are in place, in such circumstances, the PI can decide on aspects like who actually controls the device and when.

Publication of research findings: Unless significant confidentiality concerns exist and are subject to the aforementioned standards or contractual obligations, researchers are required to communicate their research findings with the appropriate stakeholders.

All feasible measures must be taken when publishing research to guarantee that published reports, data, and public statements about research activities and performance are comprehensive, accurate, and clear. The correctness and comprehensiveness of the reports that researchers provide are their responsibility.

To appreciate the funding and guarantee transparency, the type of financial support must be disclosed in all reporting of research findings.

The institution is dedicated to upholding regulatory authorities' requirements for open access to publicly funded research data and expects all researchers to do the same.

According to the criteria of authorship for the specific publication, all researchers who have contributed to the production of results and dissemination should be rightly credited.

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RV Institute of Management

Research Ethics Review Board (RERB)
Constitution, Function and Procedure

Following ICMR guidelines (2017) for biomedical and health research, the Guidance Document on Good Academic Research Practices by the UGC (August 2020), UGC (Promotion of Academic Integrity and Prevention of Plagiarism in Higher Educational Institutions) Regulations 2018, and the Best practices followed by reputed institutions, RVIM has constituted a Research Ethics Review Board (RERB).

The Research Ethics Review Board shall consist of a Chairman, Convener, and internal and external members as detailed below:

- Chairman - Director (1)
- Member Secretary - Convener of the Research Centre (1)
- Members - Any Two Senior faculty members as nominated by the Director (2) and three external members (3)

The tenure of the members of RERB shall be for three years (2023-2026).

Members of the Research Ethics Review Board and Term (2023-26)

1. Dr. Purushottam Bung: Chairperson
2. Dr. Padmalini Singh: Convener, Centre for Research and Consultancy

INTERNAL MEMBERS

3. Dr. Noor Firdoos Jahan: Internal Member
4. Dr. Tamizharasi: Internal Member

EXTERNAL MEMBERS

5. Dr. Lakshmi Arya Thathachar (History and Philosophy): External Member (Associate Dean- Research and Associate Professor, School Of Law, RV University)
6. Dr. Anjana Reddy (Legal Expert): External Member (Principal, RV Institute of Legal Studies)
7. Dr. Keerthi Kishore S. (Applied Psychology): External Member (Assistant Professor, School Of Liberal Arts and Sciences)

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The quorum requirement for RERB

- A minimum of five members should be present in the meeting room.
- Minimum one non-affiliated member should be part of the quorum.
- No decision is valid without fulfillment of the quorum.

Functions:

a) To formulate Research Ethics Policy for RVIM and get it approved by RERB.

b) To review the ethical safeguards of the proposed PhD research before data collection.

c) To report breaches of Ethics Policy or non-compliance of ethical practices among PhD scholars, students, faculty, and staff to the RERB for taking necessary actions.

d) To recommend actions on non-compliance of ethical practices among PhD scholars, students, faculty, and staff

e) To make amendments and clarity to the Policy as and when required.

f) All the research carried out by faculty and students at RV Institute of Management must comply with the Research Ethics Policy of RVIM. All research work shall be vetted by RERB, depending on:

- No review is required for research that does not involve the collection of data from human or animal subject
- RERB review is exempted from research that involves the collection of data from human subjects (adults who can provide informed consent) and collects and stores it anonymously.
- Expedited application to RERB is required for research that involves the collection of data from human subjects (adults who can provide informed consent) and requires to collect/store the identity of the subjects OR collecting audio/video/images/recording of subjects.
- Full application review will be required for the research that involves the collection of data from minors, prisoners, fetuses, pregnant women, seriously ill, mentally or cognitively compromised adults, OR research involves the study of animals (vertebrates) either captive or in an open environment.
- Any classroom assignment or project related to research does not require RERB approval unless faculty or student wish to publish their research in the public domain.

Procedure:

- The RERB will meet as and when required to screen proposals for research by Ph.D. candidates and academic staff.
- Expedited applications shall be reviewed and returned to the researcher within three weeks of submission.
- Full applications shall be reviewed and returned to the researcher within six weeks of submission.
- Exempt and Expedited applications can be reviewed by any two members of the RERB. If there is a conflict, a third member's opinion will be solicited.
- Full applications will require a quorum of 5 members including the Chairperson and Member Secretary and also a subject matter expert.
- The internal members of the committee shall screen the proposals before they are circulated to external members.

Promotion of the Research Ethics Policy

The college shall publicize the Research Ethics Policy by circulating it among the research guides/supervisors, registered research candidates, and teaching staff of the college as well as by publishing on the college website in a prominent manner so as to attract the attention of the interested persons.

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8. Ethics in Governance and Conflict of Interest (CoI):

Governance is an integral part of any institution and involves several layers of activities ranging from appointments and periodic evaluations, allotment of funds, approval for training programs and deputation for various meetings related to the institution, allotment of staff and students, to name a few. All these require fairness in judgement in decision making, despite the fact there is often a considerable room for subjectivity. Institutional systems must be created such that the decision making process is fair and transparent, providing equal opportunity to all.

An important element in the decision making is the aspect of **Conflict of Interest (CoI)**, which has been addressed to in detail (Ref. 4-6). **CoI** arises when an individual finds himself under multiple loyalties arising due to either of personal/professional relationships or due to extraneous financial considerations. These lead to a compromise on the interest of the CSIR system as these impact a person's impartiality in the decision making process (be it a selection process for a new employee; promotion of a colleague; financial matter in respect of purchases; financial grants for research, or for selection of an award or a fellowship).

It is therefore essential that in every decision making process, all the members who are involved with decision making process, necessarily sign a **Conflict of Interest Statement** indicating that none of his/her relatives, students, collaborators, group members or institutional members is/are being considered in the proposed meeting for decision making. This procedure should apply to all committees relating to the work of CSIR, i.e., institutional issues and matters such as funding for research under its Extramural Programs, various awards and prizes, and the like. Those conflicted may recuse themselves from the committee proceedings.

Conflicts of interest can also arise from competitions in research work when one favours his students/institutional colleagues in comparison to others with comparable merit. This may be, for an eventual *quid pro quo* from his colleagues. The same applies to grant process for sponsored research on behalf of National funding agencies. In all such meetings which lead to a decision of long term consequence, a **conflict of interest form** given in **Appendix-C** should be signed by each member and countersigned by the Chairman and kept as a part of the minutes.

9. Other Recommendations

9.1 Suggestions for action to reduce the stresses that lead to unethical conduct: an important aspect of reducing such cases is appropriate training and understanding of the issues involved. Thus, CSIR may evolve a system of regular workshops on various aspects, such as good laboratory practices, safety issues, publication and plagiarism, gender sensitivity, data analysis and statistical procedures and importantly training in communication.

To ensure that these courses occur at regular intervals, a dedicated **Ethics Officer** and **Safety Officer** can be appointed. He/she will be responsible to ensure that the training is imparted effectively and regularly including for those inducted afresh. These courses should carry credits in terms of career advancement. The

Safety Officer will also ensure and report on non-compliance of safety norms. Deliberate incidences of misconduct in respect of safety and ethics, may attract a mention in the confidential file of the officer/employee concerned and may affect his assessment itself.

Performance parameters for career advancement must be focussed on the quality of work and not on number of publications, nor where the research work is published. Agencies across India (UGC, MHRD, DST, DBT, SERB, CSIR, ICMR and others) must agree on a common set of parameters which should be followed. CSIR may take a lead in reorienting its evaluation procedures to take cognizance of what is published and not where is published. INSA policy statement (10) may be used as a general guideline.

9.2 In doing so, predatory journals must be avoided. Periodic updates of the names of such journals are published (e.g., the Beall's List; https://beallslist.weebly.com/) and such others). As a simple rule, with the exception of some highly reputed journals published by scientific societies that charge publication fee to ensure open access, rapid publication through payment should be strictly avoided.

9.3 Prior to sending for publications, scientists should check for plagiarism using current software tools that should be made available by the institute. The library of the institute/ Knowledge Resource Centre / Standing Publications, Ethics and Scientific Vigilance Committee or any other designated Division of the Institute can provide this service as a part of their mandate.

9.4 Archival of all primary data including field records related to publication to be deposited with the institute's knowledge resource centre or any other designated Division of the Institute with appropriate security for intellectual property. Both soft and hard copies should to be kept. This will imply creation of a data archival system within CSIR systems with appropriate security. This will require resource allocation.

9.5 Due acknowledgement of the work at CSIR should be made.

9.6 Under safe laboratory practices, due attention must be given frequently on areas such as fire safety, use of hazardous chemicals, disposal of waste of various kinds (chemical, biological, material, radioactive) and related issues. Mock drills should be conducted from time to time in order to keep all in the institution prepared and ready. Intervals between such drills should be no more than 6 months.

10. Personal Ethics/introspection:

Much of CSIR work is based on public funds and hence should be used with abundant caution. More importantly, it should be the duty of each individual to personally evaluate if the work done by him/her would lead to any tangible benefit to CSIR or the country in terms of a definitive novel idea, product or a patent.

Most institution have a cell for outreach activities and it is a part of the duties of scientists working with public funding that they provide regular overviews of their work

to the stakeholders in a clear to understand manner, without any attempt to overstate the achievement. It is essential that scientists use proper and measured language while presenting their work and mentioning the limitations of the work.

On a subtler nuance is the fact that many laboratories are well funded due to the system they belong to. These laboratories then procure large equipment and use these to work as material characterization centre and then demand their pound of flesh in the intellectual property, without any serious contribution. This is a gross unethical use of public funds, and should be discouraged. Every instrument bought with public funding should be treated as a public property and with reasonable caution on their misuse, should be made available to all, based only on the scientific merit of the analysis being done.

It is also ethical that precious public funds are used judiciously in the choice of a program. Only those programs that conform to the overall contours of CSIR's mandate be taken up. Please refer to Chapter 6 of Ref.3 for further elucidation.

11. EMR grants and CSIR grantees:

These guidelines shall also apply to researchers availing of CSIR extramural grants, as well as to CSIR Fellows including the Distinguished and Bhatnagar Fellows.

12. Grievance Redressal Mechanism: Appointment of Ombudsman

The scientific misconduct would be investigated by Scientific Investigation Board (SIB). The report of the SIB would be shared with the accused while implementing the punitive action. Any scientific/technical staff or a research worker, who is not satisfied with the recommendation of the SIB and the punishment/decision based on same by the competent authority can appeal, within 60 days, to Director General, CSIR for Grievance Redressal.

The appeal should be based on merits, clearly bringing out facts and with supporting evidences that were not taken into consideration by the SIB. DG, CSIR may, in turn, and based on the merits of the appeal, refer the matter to an Ombudsman of the concerned subject group for recommendation. The decision of DG, CSIR on recommendation of the Ombudsman shall be final and binding on all sides.

Any researcher or student who is being pressurised by his/her supervisor for unethical practices related to publications and laboratory practices may approach Standing Publications, Ethics and Scientific Vigilance Committee (SEC)/Ethics Officer.

An **Ombudsman** here is defined as an independent, impartial, free-service provider, who has not been associated with, or a beneficiary of the CSIR system ever. The Ombudsman would investigate complaints that have not been solved by the organization complained against. He/she would investigate complaints where something has been handled badly or unfairly, making someone suffer as a result. The Committee suggests the appointment of one Ombudsman to each of the five major

groups of CSIR institutions (groups of Physics, Chemistry, Biology, Engineering and Information sciences). Such an Ombudsman should be a non-CSIR person of proven scholarship, integrity and administrative experience. It is also suggested that all the Ombudsmans work in close synergy and as a group, for an overall coherence of application of rules, within the CSIR system. The Ombudsman may take the support of any technical expert, if so required.

The Ombudsman would be provided necessary support by Standing Publications, Ethics and Scientific Vigilance Committee (SEC) coordinated by Ethics Officer of the institute/CSIR Hqs. The Ombudsman will be paid honorarium, TA/DA and provided accommodation for holding the meetings.

13. Whistle Blowers and his/her identity and Protection

Whistle blowers are people who inform the authorities of some wrong doings. In an ideal case, any unsigned report from an unidentified source/person should not be acted upon. However, in the larger interest of CSIR, the DG may initiate an inquiry in cases where any anonymous complaint is accompanied by factual and verifiable data for a particular case. Fraudulent and inappropriate complaints made for reasons other than the larger interest of CSIR, will also attract a departmental enquiry, but this will also be in the scope of an approach Ombudsman. All such cases will be dealt with by the CSIR HQs and the protection of whistle blower will be ensured by it.

14. Acknowledgments

Committee thank Dr. Sudeep Kumar (Honorary Advisor to the DG), Sh. R. P. Singh (Chief Scientist & In-Charge, Mission Directorate) and Sh. Anoj Kumar Chadar (Principal Scientist, Mission Directorate, CSIR) for active participation and for appropriate advice and suggestions. And Committee thank Dr. S. Mande, DG, CSIR for his active interaction and advice.

15. References:

1. University Grants Commission (Promotion of Academic Institution and Prevention of Plagiarism in Higher Educational Institutions) Regulation, 2018.The Gazette of India, Extraordinary, Part III-Section 4, July 31, 2018.

2. "Ethical guidelines for biomedical research in human participants", Indian Council of Medical Research, India, 2017.

3. "Draft National Policy on Academic Ethics", Office of the Principal Scientific Advisor to the Government of India, 11-6-2019.

4. Ethics in Science Education, Research and Governance", Eds. K. Muralidhar, A. Ghosh, A. K. Singhvi; Indian National Science Academy, New Delhi, India, 2019.

5. "The Ethics in Science - an introduction", David B. Resnik, Routledge, New York, 1998.

to the stakeholders in a clear to understand manner, without any attempt to overstate the achievement. It is essential that scientists use proper and measured language while presenting their work and mentioning the limitations of the work.

On a subtler nuance is the fact that many laboratories are well funded due to the system they belong to. These laboratories then procure large equipment and use these to work as material characterization centre and then demand their pound of flesh in the intellectual property, without any serious contribution. This is a gross unethical use of public funds, and should be discouraged. Every instrument bought with public funding should be treated as a public property and with reasonable caution on their misuse, should be made available to all, based only on the scientific merit of the analysis being done.

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