Helmholtz Centre for Ocean Research Kiel

Guidelines for safeguarding good scientific practice

KODEX GEOMAR Helmholtz Centre for Ocean Research Kiel (08.05.2023)

SECTION A: PRINCIPLES

Guideline 1: Commitment to the general principles

GEOMAR defines the rules for good scientific practice in accordance with the DFG guidelines and with the participation of its employees and appropriate committees, communicates them to its employees and obliges them to comply with them, taking into account the specifics of the relevant subject area. Each researcher is responsible for ensuring that their own behaviour complies with the standards of good scientific practice.

Explanations:

This includes in particular:

- to work lege artis
- to maintain strict honesty with regard to one's own contributions and those of third parties
- to consistently question all results oneself.
- to allow and promote critical discourse in the scientific community
- Results must be documented

Guideline 2: Professional ethics

Academics and academic support staff are responsible for realising the fundamental values and standards of academic work in their actions and standing up for them. Teaching the fundamentals of good scientific work begins as early as possible in academic teaching and scientific training. Scientists at all career levels regularly update their knowledge of the standards of good scientific practice and the state of research. Workshops are organised annually for this purpose.

Explanations:

Experienced scientists and early career researchers support each other in the continuous learning and training process and are in regular dialogue. Doctoral candidates and supervisors at GEOMAR deal with the rules of good scientific practice as part of the mandatory supervision agreements and undertake to comply with them.

Regulations of the <u>Christian-Albrechts-Universität zu Kiel</u> are included. This guideline corresponds to management guidelines that are currently being implemented at GEOMAR. In addition, GEOMAR will develop an online module on good scientific practice to be completed annually and integrate it into the existing administration portal at GEOMAR.

Guideline 3: Organisational responsibility of the management of scientific institutions
The GEOMAR Directorate creates the framework conditions for good scientific work. It is
responsible for adhering to and communicating good scientific practice and for providing
appropriate career support for all scientists. The GEOMAR Board of Directors guarantees



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that the scientific staff can comply with legal and ethical standards. The framework conditions include clear and written procedures and principles for personnel selection and development as well as for the promotion of young scientists and equal opportunities.

Explanations:

GEOMAR has developed clear, written procedures and principles for

- Standards for advertising and filling positions
- Structured, gender-equitable personnel selection procedures
- An equal opportunities plan
- Transparent guidelines for permanent employment
- A conflict counselling and complaints office with regular consultation hours
- An offer for confidential individual career counselling
- Access for employees from science, administration and management to the Helmholtz Association's mentoring programme
- Standards for structured doctoral training

The knowledge and utilisation of these instruments for personnel selection and development, with particular regard to equal opportunities and the promotion of young academics, are evaluated by means of employee surveys.

Guideline 4: Responsibility of the management of work units

The head of a scientific work unit is responsible for the entire unit. The cooperation in scientific work units is such that the group as a whole can fulfil its tasks, that the necessary cooperation and coordination take place and that all members are aware of their roles, rights and duties. The management task also includes, in particular, ensuring the appropriate individual supervision of junior researchers - embedded in the overall concept of the respective institution - as well as the career advancement of academic and academic support staff. Abuse of power and the exploitation of relationships of dependency are contrary to good scientific practice and must be prevented by appropriate organisational measures both at the level of the individual scientific unit and at the level of the management of scientific institutions.

Explanations:

GEOMAR is currently developing management guidelines that will serve as a framework for orientation and action for all employees and managers at the centre. One of the aims of these guidelines is for managers at GEOMAR to reflect on and further develop their leadership behaviour.

To this end, the annual dialogue (to be introduced in 2021) will include management feedback. Management behaviour is also discussed as part of regular employee surveys. Employees at GEOMAR also have the opportunity to visit the contact points (e.g. staff council or ombudsman committee) in the event of conflicts in dependency relationships and receive counselling there.

Managers with disciplinary management responsibility have the opportunity to take part in the Helmholtz Academy for Managers' programmes for further training and networking.

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Guideline 5: Performance dimensions and evaluation criteria

A multidimensional approach is required to assess the performance of academics: In addition to academic performance, other aspects should also be taken into consideration. The assessment of performance is primarily based on qualitative standards, whereby quantitative indicators can only be included in the overall assessment in a differentiated and reflected manner. Where voluntarily stated, individual characteristics in CVs are also included in the judgement, in addition to the categories of the General Equal Treatment Act.

Explanations:

In addition to the acquisition of knowledge and its critical reflection, other performance dimensions are included in the assessment, for example commitment: 0 in teaching o in academic self-administration in the provision and preparation of research data in public relations in knowledge and technology transfer

Aspects of the scientific attitude such as openness to knowledge and willingness to take risks are also taken into account. Personal time off for family or health reasons, extended periods of training or qualification, alternative career paths or comparable circumstances are given appropriate consideration. When assessing scientific performance, GEOMAR is guided by the concept of "informed peer review". Quantitative indicators are always used in the context of other qualitative and quantitative indicators.

Guideline 6: Ombudspersons

GEOMAR has three independent ombudspersons to whom its scientists and members can turn in matters of good scientific practice and suspected scientific misconduct. The Centre takes sufficient care to ensure that the ombudspersons are known at the institution.

Explanations:

- GEOMAR has three ombudspersons
- Ombudspersons are scientists of integrity: The GEOMAR Scientific Council proposes the appointment of ombudspersons with management and supervisory experience to the Directorate
- In order to ensure continuity, the ombudspersons should be elected at intervals of one year
- To avoid bias, the ombudspersons should come from different research areas so that two ombudspersons are always unbiased and can exchange information
- The term of office of ombudspersons at GEOMAR is limited to three years, a further term of office is possible
- Ombudspersons may not be members of the Management Committee or the Enlarged Management Committee while holding this office.
- Ombudspersons advise on questions of good scientific practice and in cases of suspected scientific misconduct and, where possible, contribute to solutionorientated conflict mediation Ombudspersons accept enquiries in a confidential manner and then proceed as described in Section C

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- Ombudspersons receive the necessary support and acceptance from GEOMAR in the fulfilment of their tasks; in order to increase the functionality of the ombudsman system, GEOMAR provides for measures to relieve the ombudspersons in other ways
- GEOMAR employees can contact either the GEOMAR ombudsperson or the supraregional "Ombudsman Committees for Science" in the Helmholtz Association.

SECTION B: RESEARCH PROCESS

Guideline 7: Cross-phase quality assurance

The scientists carry out each step in the research process lege attis. When scientific findings are made publicly accessible (in the narrower sense in the form of publications, but also in the broader sense via other communication channels), the quality assurance mechanisms applied are always explained. This applies in particular when new methods are developed.

Explanations:

Continuous quality assurance at GEOMAR refers in particular to compliance with specialised standards, established methods and processes such as • the calibration of devices

- Collecting, processing and analysing research data
- Selection and use of research software, its development and programming as well as
- the maintenance of laboratory notebooks, which are scanned and archived regularly (at least annually)

An essential component of quality assurance is the requirement that results or findings can be replicated or confirmed by others. For this reason, the origin of data, organisms, materials and software used is labelled and subsequent use is documented; original sources are cited. The type and scope of the resulting research data are described and the handling of them is organised in accordance with the requirements of the relevant subject. The source code of publicly accessible software must be persistent, citable and documented.

To support this culture, various guidelines at GEOMAR provide orientation and further detailed information:

- Guideline for scientific publications (Green Open Access as standard, open data publication as standard, open licences as standard with a view to subsequent use, use of persistent identification for publications, persons, projects, samples, devices)
- Principles for handling research data at GEOMAR

If findings have been made publicly accessible and discrepancies or errors are subsequently discovered, these will be corrected. The researchers shall work with the relevant publisher, infrastructure provider, etc. as quickly as possible to ensure that the correction or, if necessary, retraction is made and marked accordingly. The same applies if third parties

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point out such discrepancies or errors. Corrected publications are also recorded in the GEOMAR OceanRep publication database.

Guideline 8: Actors, responsibilities and roles

The roles and responsibilities of the scientific and science-related persons involved in a research project must be clear at all times.

Explanations:

- The participants in a research project are in regular dialogue; they define their roles and responsibilities in an appropriate manner. These are adapted where necessary.
- The role descriptions of GEOMAR are defined in the signature and representation rules

Guideline 9: Research design

When planning a project, researchers take the current state of research comprehensively into account and recognise it. The identification of relevant and suitable research questions requires careful research into research achievements that have already been made publicly accessible. GEOMAR ensures the necessary framework conditions for this.

Explanations:

 GEOMAR provides a range of infrastructures to support the research design process (e.g. library and information services) Scientists examine whether and, if so, to what extent gender and diversity can be significant for the project (with regard to methods, work programme, objectives, etc.). The respective framework conditions are taken into account when interpreting findings.

Guideline 10: Legal and ethical framework conditions, rights of use

Scientists handle the constitutionally granted freedom of research responsibly. They take into account rights and obligations, in particular those resulting from legal requirements, but also from contracts with third parties and, if necessary, obtain and submit authorisations and ethics votes. With regard to research projects, a thorough assessment of the research consequences and an evaluation of the respective ethical aspects should be carried out. The legal framework conditions of a research project also include documented agreements on the rights of use of the research data and research results arising from it.

Explanations:

- Scientists are constantly aware of the danger of instrumentalising research results
- Their responsibility includes compliance with legal requirements and the obligation to utilise their knowledge, experience and skills in such a way that risks can be identified, assessed and evaluated.

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- Scientists take particular account of the aspects associated with safety-relevant research (dual use)
- GEOMAR is responsible for ensuring that the actions of its employees comply with the rules and promotes this through suitable organisational structures. GEOMAR develops binding principles for research ethics and procedures for the corresponding assessment of research projects
- Scientists enter into documented agreements on the rights of use as early as possible in the research project. This is ensured by the employees of the Technology Transfer and Legal Affairs teams at GEOMAR, among others.
- Documented agreements are the rule at GEOMAR if several institutions are involved in a research project or if it is foreseeable that a scientist will change research institutions and would like to use the data generated by them for their own research purposes. The copyright belongs to the scientist who collects it. The employer (GEOMAR) is generally entitled to the rights of use on the basis of an employment contract agreement. GEOMAR, represented by the head of the working group, consults with the scientists (and science-related personnel) on the possible utilisation of the rights of use. In the context of an ongoing research project, GEOMAR, represented by the head of the working group (and science-related personnel), decides whether third parties should be granted access to the data. This is usually the case if rights of use are required by project partners for the successful realisation of research projects.
- All research projects at GEOMAR must comply with the DFG's current guidelines for "Animal Experiments in Research". In addition, experiments and studies must be designed in such a way that damage to the environment and organisms is minimised.

Guideline 11: Methods and standards

Scientists use scientifically sound and reproducible methods to answer research questions. When developing and applying new methods, they attach particular importance to quality assurance and the establishment of standards.

Explanations:

The application of a method requires specific competences, which may be covered by corresponding collaborations. The establishment of standards for methods, the use of software, the collection of data and the description of results are prerequisites for the comparability and transferability of research results.

Guideline 12: Documentation

Researchers document all information relevant to the production of a research result in such a comprehensible manner as is necessary and appropriate in the specialist area concerned in order to be able to review and evaluate the result. In principle, they also document individual results that do not support the research hypothesis; results must not be selected in this context. If specific professional recommendations exist for the review and evaluation, the researchers will document the results in accordance with the

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respective requirements. If the documentation does not fulfil these requirements, the limitations and the reasons for them must be clearly explained. Documentation and research results must not be manipulated; they must be protected against manipulation as far as possible.

Explanations:

An important basis for enabling replication is the information about

- used or emerging research data
- Methodological, evaluation and analysis steps
- If necessary, document the development of the hypothesis. Traceability of citations

Guideline 13: Establishing public access to research results

Where possible, third parties are authorised to access this information. When developing research software, the source code is documented. To support this culture, various guidelines at GEOMAR provide orientation and further detailed information:

- Guidelines for scientific publications
- Guidelines on the utilisation and licensing of research software

Taking into account the idea of "quality over quantity", scientists avoid inappropriately small publications. They limit the repetition of the contents of their publications to the extent necessary for understanding the context and mark them as repetitions. Researchers provide complete and correct references to their own and other researchers' preliminary work.

Guideline 14: Authorship

An author is anyone who has made a genuine, comprehensible contribution to the content of a scientific text, data or software publication. All authors agree to the final version of the work to be published. They bear joint responsibility for the publication, unless explicitly stated otherwise. Authors shall ensure and, as far as possible, work towards ensuring that their research contributions are labelled by the publishers or infrastructure providers in such a way that they can be correctly cited by users.

Explanations:

The contribution must be made to the scientific content of the publication. When a contribution is genuine and comprehensible depends on the subject area concerned and must be assessed on a case-by-case basis. A comprehensible, genuine contribution is deemed to have been made in particular in the case of significant involvement:

- the development and conception of the research project or
- the preparation, collection, procurement, provision of data, software, sources or
- the analysis/evaluation or interpretation of the data/sources and the conclusions drawn from them or the writing of the manuscript

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Honorary authorship where no such contribution has been made is not permitted. A management or supervisor function does not in itself justify co-authorship. If a contribution does not justify co-authorship, the support can be appropriately recognised in footnotes, in the foreword or in the acknowledgement.

The participating scientists agree on the authorship. Agreement on the order of authorship is usually reached at the latest when the manuscript is formulated, based on comprehensible criteria and taking into account the conventions of each subject area. Consent to the publication of results may not be refused without sufficient reason. The refusal must be justified with a verifiable criticism of data, methods or results. The contribution of an individual to a research achievement should be communicated

GEOMAR uses the DFG guidelines as a basis for determining the entitlement to coauthorship.

Guideline 15: Publication medium

transparently whenever possible.

Authors choose the publication medium carefully, taking into account its quality and visibility in the respective field of discourse. The academic quality of a contribution does not depend on the publication medium in which it is made publicly accessible.

Scientists who take on the role of editor carefully check for which publication organs they take on this task.

Explanations:

In addition to publications in books and scientific journals, GEOMAR's specialised repositories, data and software repositories are also considered. A new or unknown publication organ is checked for its seriousness. A key criterion in the selection decision is whether the publication organ has established its own guidelines for good scientific practice.

The GEOMAR Library and Data Management department offers suitable repositories for all research products. In the text area, this is OceanRep, which not only functions as a publication database and open access repository, but also serves as an electronic publishing platform. For research data and software publications, the research data portal is available, which is linked to external databases such as Pangaea and Genbank. In addition, the library offers assistance and review services for the selection of publication organs and assessment of their reliability. Predatory publishing is explicitly excluded in the guidelines for scientific publications.

Guideline 16: Confidentiality and neutrality in assessments and counselling

Honest behaviour is the basis of the legitimacy of a judgement process. Researchers who assess submitted manuscripts, funding applications or the expulsion of individuals in particular are obliged to maintain strict confidentiality in this regard. They disclose all facts

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that could give rise to concerns of bias. The same obligations also apply to members of scientific advisory and decision-making bodies.

Explanations:

The confidentiality of third-party content excludes its disclosure to third parties and its own use. Researchers must report any conflicts of interest or bias that may exist in relation to the research project or the person or subject of the review/consultation to the responsible body without delay.

Guideline 17: Archiving

Researchers shall adequately secure publicly accessible research data or research results as well as the central materials on which they are based and the research software used, and store them for an appropriate period of time. If there are comprehensible reasons for not retaining certain data, the scientists shall explain them. GEOMAR ensures that the necessary infrastructure is in place to enable archiving.

Explanations:

If scientific findings are made publicly accessible, the underlying research data (predominantly raw data) are generally stored for a period of ten years in an accessible and traceable manner at the institution where they were created or in repositories across multiple locations. In justified cases, shorter retention periods may be appropriate; the corresponding reasons are described in a comprehensible manner. The retention period begins on the date on which public access is established. GEOMAR supports scientists by providing advice and suitable infrastructures, e.g. for backup, long-term archiving, physical samples or research data publication.

SECTION C: NON-COMPLIANCE, PROCEDURE Preamble:

Scientific misconduct is always to be assumed when principles of good scientific practice are intentionally or grossly negligently violated or circumvented for non-scientific purposes. The spectrum of possible scientific misconduct can range from criminal acts relevant under criminal law to marginal violations of the principles of scientific ethics. At the same time, it may also involve the violation of civil law obligations, in particular labour contract obligations.

Scientific misconduct may be considered in particular:

Falsification of scientific facts, for example

- Invention/falsification of results
- Falsification of results, for example by concealing and suppressing "undesirable" results
- Knowingly ignoring contrary relevant results of others
- Deliberately distorted interpretation of results
- Deliberately distorted reproduction of third-party research results

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- Misleading by knowingly making false statements, for example in the case of funding applications and reports on the use of funding
- Misleading in publications, such as publication without appropriate citations
- Infringement of intellectual property, e.g. by
- unauthorised use under presumption of authorship (plagiarism)
- Presumption or unfounded assumption of scientific authorship or co-authorship
- Denial of a claim of others to co-authorship acquired through appropriate contributions
- Exploiting, publishing or otherwise making available third-party, unpublished concrete ideas, methods, research results or approaches without the consent of the authorised party (theft of ideas)
- Knowingly concealing relevant preliminary work

Sabotage through malicious damage, destruction or manipulation of other people's work equipment, for example of

- Devices and experimental set-ups
- Data, documents and electronic software
- Consumables (e.g. chemicals)
- Sample material

Shared responsibility for the scientific misconduct of others can arise, for example, through o active participation in the misconduct of others

- Knowing about and tolerating the misconduct of others
- Conscious co-authorship of falsified publications
- Gross neglect of supervisory duties
- Incitement to circumvent the rules of good scientific practice

Guideline 18: Whistleblowers and persons affected by allegations

The responsible bodies at GEOMAR (usually the ombudspersons) who investigate suspected scientific misconduct are committed to protecting both the whistleblower and the person affected by the allegations in an appropriate manner. The investigation of allegations of scientific misconduct is carried out expressly in compliance with confidentiality and the basic principle of the presumption of innocence. The whistleblower's report must be made in good faith. Deliberately false or wilful allegations may themselves constitute scientific misconduct. Neither the whistleblower nor the:person affected by the allegations should suffer any disadvantages for their own academic or professional advancement as a result of the report.

Explanations:

- As far as possible, the advertisement should not lead to delays in the qualification of the person providing the information, the preparation of theses and doctorates should not be disadvantaged; this also applies to working conditions and possible contract extensions.
- The investigating body follows the basic principle of the presumption of innocence towards the person concerned at every stage of the proceedings.

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- The: The person affected by the allegations should not suffer any disadvantages from the investigation of the suspicion until scientific misconduct has been formally established.
- The whistleblower must have objective evidence that standards of good scientific practice may have been violated.
- If the whistleblower cannot check the facts themselves or if there are uncertainties, the whistleblower should contact a local ombudsperson or higher-level bodies such as the "Ombudsperson for Science" committee or the HGF's central ombudsman's office to clarify the suspicion.
- GEOMAR decides on its own responsibility whether it will also review anonymous reports. An anonymous report can only be considered in a procedure. The investigation may only be carried out if the person providing the information presents reliable and sufficiently concrete facts to the investigating body.
- If the whistleblower is known by name, the investigating body shall treat the name confidentially and shall not disclose it to third parties without the corresponding consent. This only applies if there is a legal obligation to do so or if the person affected by the allegations would otherwise not be able to defend themselves properly because the identity of the whistleblower is exceptionally important for this.
- Before the name of the whistleblower is disclosed, he/she will be informed immediately; the whistleblower can decide whether to withdraw the report if it is foreseeable that the name will be disclosed.
- The confidentiality of the procedure is restricted if the: The whistleblower reports the suspicion to the public. The investigating body decides on a case-by-case basis how to deal with a breach of confidentiality by the whistleblower.
- The:The whistleblower must also be protected in the event of unproven scientific misconduct, provided that the allegations were not demonstrably made wi of better knowledge.

Guideline 19: Procedure in cases of suspected scientific misconduct

GEOMAR establishes procedures for dealing with allegations of scientific misconduct. Corresponding regulations are issued on the basis of an adequate legal foundation. The regulations to be established include, in particular, definitions of the facts of scientific misconduct, procedural rules and measures to be taken if scientific misconduct is detected. The regulations are applied in addition to relevant, higher-ranking standards.

Explanations:

- Not every violation of the rules of good scientific practice constitutes scientific misconduct.
 - Only intentional or grossly negligent offences may be considered as scientific misconduct.
- The:person affected by the allegations and the:whistleblower will be given the opportunity to comment at each stage of the proceedings.
- Until scientific misconduct is proven, the information about the parties involved in the procedure and the findings to date will be treated confidentially. •GEOMAR guarantees that the entire procedure will be conducted as promptly as possible.



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- The regulations set out various measures that are to be applied depending on the severity of the proven scientific misconduct.
- If, following a finding of academic misconduct, the withdrawal of an academic degree is considered as a measure, the responsible bodies (usually the Faculty of Mathematics and Natural Sciences at Kiel University) will be involved.
- Once the investigation has been completed, the result will be communicated to the scientific organisations concerned and, if applicable, to third parties who have a justified interest in the decision.

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Procedure at GEOMAR for suspected cases:

It is an essential feature of good scientific practice not to tolerate scientific misconduct by others. The usual procedure when misconduct is suspected should be to address the possible misconduct with its authors and seek clarification and, if necessary, correction.

For many reasons, however, this can encounter difficulties. GEOMAR therefore institutionalises a procedure to be followed if a suspicion or accusation of scientific misconduct arises against a GEOMAR employee that cannot be clarified in a direct conversation or with the usual instruments of personnel management.

There is an inherent legal tension in this procedural regulation:

Internal centre procedural regulations must not, for example, invalidate the obligations/instruments under labour law. They must, of course, also comply with the constitutionally protected academic freedom.

Ombudspersons - preliminary/clarification:

- In the event of concrete suspicions of scientific misconduct, an ombudsperson who
 does not belong to the research area concerned should first be informed in writing
 if necessary, with evidence or supporting material. It is recommended that the
 ombudsperson contacted consults with a second, impartial ombudsperson about
 the case.
- Those suspected of misconduct can also turn to the responsible ombudspersons for clarification and assistance.
- The ombudspersons promptly take the steps they deem appropriate or necessary to clarify the facts of the case as comprehensively and discreetly as possible.
- The person affected by the suspicion must be given the opportunity to comment at the earliest possible time.
- As soon as the suspicion of a relevant violation of good scientific practice is substantiated, the ombudspersons must inform the Board of Directors of the status of the clarification of the facts so that, if necessary, steps can be taken under labour law within a reasonable period of time. Otherwise, the ombudspersons are obliged to maintain confidentiality.

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Result of the preliminary investigation - final report of the ombudspersons:

- The ombudspersons then draw up a report on the outcome of the preliminary investigation.
- An investigative commission will be set up to further clarify the facts on the basis of the final report drawn up by the ombudspersons as part of the preliminary investigation.
- It is made up as follows:
- Director (not authorised to vote),
- Administrative Director (non-voting),
- The spokesperson of the Scientific Council
- two GEOMAR ombudspersons
- a scientist from a research area not affected
- an ombudsperson from Kiel University

If necessary, external experts/expertises can be called in to advise the Investigation Commission. In suspected cases that are brought to GEOMAR from outside the Centre, the Investigation Commission must be supplemented by an external member.

It is chaired by the Director or, in his or her absence, by the Administrative Director.

The members of the investigatory commission shall immediately disclose all facts that could give rise to concerns of bias. The investigation committee then decides whether there is actually any bias. In the event of bias, the respective deputies or other persons must be named as members.

The investigating commission must clarify the facts of the case by hearing all parties involved and all other conceivable sources of information in a free evaluation of evidence.

Procedural principles:

- The deliberations of the commission of enquiry are not public. The parties involved are obliged to maintain confidentiality with regard to all information relating to the case
- The result of the investigation shall be summarised by the:chairperson of the investigation commission and communicated in writing to the:person concerned and, at his/her:request, to the:person who:raised the suspicion. The:complainant will be informed of the outcome of the proceedings.
- Based on the findings of the investigative commission, the director or the deputy administrative director must take the necessary measures. In cases relating to DFG funding activities, the DFG will be informed of the results of the commission's work.
- There is no internal appeal procedure against decisions of the Investigation Committee or the Board of Directors.

Possible consequences of scientific misbehaviour:

Depending on the circumstances and severity of the individual case, academic misconduct can have the following consequences:

Consequences under criminal law

Academic consequences in the form of the withdrawal of academic degrees

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Revocation of academic publications
 Consequences under labour law, such as a warning or Dismissal
 Consequences under civil law, such as the issuing of a house ban, claims for restitution or damages
 Information for the public/cooperation partners

The scientific employees of GEOMAR undertake to recognise this Code by signing a binding declaration of commitment, which is handed over to them when they sign the contract and which they confirm they have received and acknowledged.

Entry into force:

This Code comes into force on the day it is signed by the Management Board and is subsequently brought to the attention of

employees and published on the intranet.

M.O. 2023

Date, Signature Director

Prof Dr Katja Matthes

Date, Signature Administration Director Frank Spiekermann