Center for Artificial Intelligence and Quantum Computing in System Brain Research

Annex 2 to Deliverable 2.5

Policy against Research and AI misconduct

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CLARA - Center for Artificial Intelligence and Quantum Computing in System Brain Research
Annex 2 to Deliverable 2.4: Policy against Research and AI misconduct

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Disclaimer

Document Status – History of Changes

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Confidentiality

Does this report contain confidential information?	Yes ☐ No ☑
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Executive Summary

The purpose of this Policy is to promote integrity and ethical conduct in all research and AI-related activities. Its goal is to ensure that all scientific research conducted under the auspices of CLARA is carried out with the highest standards of integrity, responsibility, and professionalism.

This Policy applies to all CLARA Personnel.
This Policy sets the minimum standard that must be complied with. In cases where legal regulations or contractual obligations set higher standards, these higher standards must prevail.

1. Definitions

For the purpose of this Policy:

AI means Artificial Intelligence. It refers to a machine-based system that is designed to operate with varying levels of autonomy and that may exhibit adaptiveness after deployment, and that, for explicit or implicit objectives, infers, from the input it receives, how to generate outputs such as predictions, content, recommendations, or decisions that can influence physical or virtual environments.

AI Act means regulation (EU) 2024/1689 of the European Parliament and of the Council of 13 June 2024 laying down harmonized rules on artificial intelligence and amending Regulations (EC) No 300/2008, (EU) No 167/2013, (EU) No 168/2013, (EU) 2018/858, (EU) 2018/1139 and (EU) 2019/2144 and Directives 2014/90/EU, (EU) 2016/797 and (EU) 2020/1828 (Artificial Intelligence Act).

AI Misconduct means unethical or unauthorized use of AI, including but not limited to data manipulation, misuse of AI-generated outputs, or violation of privacy and fairness principles.

CLARA means project Center for Artificial Intelligence and Quantum Computing in System Brain Research.

CLARA Director means a person who was appointed a director or interim director of the CLARA Project by INDRC.

CLARA Personnel or you means any employee, or member of any governing, supervisory or advisory body of CLARA. For the purposes of this definition, individuals providing expert services to CLARA, in relation to the scope of the INDRC activities (and not acting as a Third Party) shall also be considered CLARA Personnel.

Director means INDRC Director or CLARA Director or a director of any other Partner of CLARA. Each Director shall exercise the rights and responsibilities of a Director under this Policy with respect to the specific branch, unit, or project they oversee. When this Policy instructs Personnel to contact "the Director," it shall be understood to mean the Director of the branch, unit, or project to which the Personnel are assigned.

Fabrication means intentional invention or falsification of data, results, or research processes and presenting them as genuine.

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Falsification means intentional manipulation, alteration, or omission of data, materials, equipment, processes, or results such that the research is not accurately represented.

INDRC means International Neurodegenerative Disorders Research Center, zapsaný ústav and other branches, unites or projects created under the INDRC, or project which are under the supervision of INDRC, including CLARA, or project on which INDRC cooperates with other organizations.

INDRC Director means a person who was appointed an executive director of INDRC.

CLARA Personnel means any employee, contractor, or member of any governing, supervisory or advisory body of INDRC. For the purposes of this definition, individuals providing expert services to CLARA, in relation to the scope of the CLARA activities (and not acting as a Third Party) shall also be considered CLARA Personnel.

Plagiarism means using another's ideas, processes, results, or words without giving appropriate credit and without specific approval, including those learned of through confidential review of others' research proposals and manuscripts.

Policy means this Policy against Research and AI misconduct.

2. Responsibilities

The Director oversees communication, dissemination, training, and adherence to this Policy.

CLARA expects all CLARA Personnel to conduct themselves in an exemplary manner and to fully comply with the provisions herein. Failure to comply with the terms of this Policy may be subject to disciplinary actions in accordance with applicable labor law(s) as applicable.

3. Requirements

3.1. Research

All research and AI development must comply with national and international ethical guidelines, as well as CLARA's policies including the Code of Conduct and Ethics.

Proper documentation, citation, and transparency in methodology must be maintained. Use of AI tools must be clearly disclosed, including limitations and risks. Any conflict of interest must be declared and managed appropriately in compliance with the Policy on Conflict of Interest. Breaches of this Policy may result in disciplinary action, up to and including termination of employment / other engagement or expulsion.

3.1.1. Principles of Research integrity

CLARA is committed to the following principles and values and expects all CLARA Personnel to fully embody and uphold them:

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- Honesty in all aspects of research, including proposal writing, data collection, analysis, interpretation, and reporting.
- Accuracy in representing data, results, and methods.
- Efficiency in the use of resources, avoiding waste or duplication.
- Objectivity in interpretation of findings and peer review.
- Accountability for the conduct of research and its outcomes.
- Respect for colleagues, research participants, animals, the environment, and societal values.

3.1.2. Plagiarism

Plagiarism is a serious research misconduct offense, and it may result in disciplinary actions.

Examples of Plagiarism include, but are not limited to:

- **Direct Plagiarism**: Copying text word-for-word from a source without quotation marks or proper citation.
- **Paraphrasing Plagiarism**: Rephrasing someone else's ideas without proper attribution.
- **Self-Plagiarism**: Reusing one's own previously published work or data without proper citation or authorization.
- **Mosaic Plagiarism**: Mixing copied phrases with original work or substituting synonyms while retaining the original structure and meaning.
- **Improper citation**: Failing to give credit to the source of information or misrepresenting the source.

Please note that CLARA may use Plagiarism detection tools. For further guidance, please refer to the Code of Conduct and Ethics.

3.1.3. Fabrication

Fabrication of data is a fundamental breach of research integrity, and it may result in disciplinary actions. CLARA is committed to promoting a research environment based on honesty, rigor, and accountability. All CLARA Personnel involved in research are expected to uphold these standards and report any suspected cases of fabrication.

Examples of Fabrication include, but are not limited to:

- Creating non-existent data, results, or events and recording them as if they were real.
- Reporting experiments, surveys, or observations that were never conducted.
- Inventing or manipulating data to support desired outcomes or hypotheses.
- Presenting fabricated citations or references.

3.1.4. Falsification

Falsification is a serious violation of research integrity and ethical standards, **and** it may result in disciplinary actions.

Examples of Falsification include, but are not limited to:

- Manipulating research data or results (e.g., altering images, graphs, or numerical values) to mislead or produce a desired outcome.
- Omitting or suppressing data that contradicts research hypotheses or conclusions.

- Misrepresenting experimental procedures or methodologies.
- Altering dates, times, or locations of data collection or research activities.
- Falsifying credentials, authorship contributions, or approval dates for ethical reviews.

3.2. Use of AI

3.2.1. Proper use of AI

The use of AI must adhere to the highest standards of ethical, transparent, and responsible conduct. All CLARA Personnel engaging with AI tools and systems are expected to ensure that such technologies are used in a manner that supports integrity, accuracy, and fairness in research, education, and institutional operations.

AI systems, models and related tools that are developed, trained or tested exclusively for the purpose of scientific research and remain confined to the internal research environment are, for that period outside the scope of AI Act. During this phase, CLARA Personnel shall nevertheless honor all principles of honesty, professionalism, objectivity, responsibility towards society and confidentiality set out in this Policy.

The decisive moment at which the AI Act becomes applicable is reached upon the earliest occurrence of any of the following:

- **Placing on the market** – the AI system, model or any of its substantial outputs is first made available to a person or entity outside the originating research team, whether for payment or free of charge;
- **Putting into service** – the AI system is first used, by the originating organisation or by another party, for its intended real-world purpose
- **Real-world testing** – individuals external to the originating research team (including volunteers, pilot users or members of the public) can interact with, rely on or be affected by the system in conditions that are not purely experimental or simulated.

As soon as the decisive moment occurs, the project lead shall, without delay: (a) determine the system's regulatory category (prohibited, high-risk, transparency-obligation, general-purpose model or other); (b) prepare the documentation, risk analysis and conformity assessment required by the AI Act for that category; (c) notify the Ethics & Security Manager and obtain written confirmation of compliance prior to further distribution or deployment.

Key Principles of Proper AI use:

- Transparency. CLARA Personnel must clearly disclose when AI tools have been used in the creation, analysis, or presentation of work. This includes written content, images, data processing, and any other outputs.
- Attribution. AI-generated or AI-assisted content must be properly acknowledged. Researchers and authors must not present AI-generated outputs as their original human work without citation or explanation.
- Human Oversight. All AI tools must be used under the supervision of human judgment. CLARA Personnel members are responsible for reviewing, validating, and, if necessary, correcting AI-generated results or suggestions.
- Fairness and Non-Discrimination. AI systems must be assessed for potential biases. CLARA Personnel members are responsible for ensuring that AI applications do not lead to discriminatory, unfair, or harmful outcomes.
- Compliance and Integrity. AI use must not be employed to circumvent ethical review, manipulate research results, fabricate data, or plagiarize content. Such misuse will be treated as research misconduct.

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Data Privacy and Security:

AI must be used in accordance with applicable data protection laws and CLARA policies.

CLARA Personnel is strictly prohibited from entering any personal data, trade secrets, confidential information, or copyrighted materials into AI-based systems with the exception of the usage of on-premises AI systems explicitly allowed by the partner organizations for the respective category of data. This includes, but is not limited to, sensitive personal information about individuals, customers, or third parties, proprietary CLARA data, strategic business details, technical specifications, confidential communications, or materials protected by intellectual property rights. Employees must carefully assess the content they submit to AI tools, ensuring it contains no restricted or protected information. Violation of this directive could lead to serious legal and regulatory implications, unauthorized disclosure of information, and significant harm to the CLARA's business interests and reputation.

Outputs generated by AI systems are not protected by copyright, as they are not considered the result of human creative effort. Therefore, CLARA Personnel must exercise caution when using AI-generated content, particularly in contexts where originality, authorship, or intellectual property rights are important. AI outputs should be used as supportive materials or drafts rather than final or standalone work unless properly reviewed and validated by a human author. CLARA Personnel is responsible for ensuring that the use of AI aligns with legal, ethical, and professional standards, and that it does not mislead others about authorship or originality.

3.2.2. AI Misconduct

AI misconduct includes, but is not limited to:

- **Data manipulation**. Using AI to generate, alter, or falsify research data or images without clear disclosure.
- **Unattributed AI-generated content**. Presenting AI-generated text, code, or visuals as original human work without acknowledgement.
- **Bias and discrimination**. Deploying AI models that produce or reinforce unfair, biased, or discriminatory outcomes without proper validation and mitigation.
- **Opaque methodology**. Failing to disclose the use of AI tools or techniques in research, analysis, or authorship.
- **Misuse of AI tools**. Employing AI to violate privacy, manipulate behavior, or circumvent ethical review (e.g., scraping personal data, automated surveillance).
- **Inaccurate citation**. Citing fabricated or hallucinated sources produced by generative AI tools.

3.3.   AI systems development and deployment

All development and deployment of AI systems within CLARA must be conducted in accordance with the principles of safety, transparency, accountability, and human oversight, as outlined in the AI Act.

Risk-Based Approach

AI systems must be deployed in accordance with a risk-based framework. CLARA Personnel members must identify whether the system falls under:

- Unacceptable-risk AI systems (which are prohibited),
- High-risk AI systems (subject to strict requirements),
- Limited-risk or minimal-risk AI systems (with voluntary codes of conduct).

Systems identified as high-risk must undergo appropriate risk assessment, conformity checks, and documentation prior to deployment or use.

Requirements for High-Risk AI systems:

When developing high-risk AI systems, CLARA Personnel members must ensure:

- Data Governance. Training, validation, and testing data must be relevant, representative, and free from bias as far as possible.
- Technical Documentation. Complete and detailed technical documentation must be maintained and made available to regulators upon request.
- Transparency and User Information. Clear instructions for use and limitations of the system must be provided to users.
- Human Oversight. Mechanisms must be implemented to ensure that human operators can oversee the system and intervene when necessary.
- Robustness, Accuracy, and Cybersecurity. The system must function reliably, withstand potential attacks, and ensure resilience throughout its lifecycle.

Ethical and Legal Compliance:

CLARA Personnel members must:

- Comply with applicable laws on data protection, non-discrimination, fundamental rights, and sector-specific regulations, including AI Act.
- Avoid creating systems that manipulate behavior, exploit vulnerabilities, or undermine human autonomy.
- Respect intellectual property rights and refrain from unauthorized scraping or use of copyrighted or proprietary data.

Registration and Monitoring:

High-risk AI systems must be registered in the EU's public database prior to being placed on the market or used.

CLARA Personnel members must implement procedures for continuous monitoring, incident reporting, and post-market performance evaluation.

Documentation and Traceability:

The development process must be fully documented, including version control, design decisions, training data sources, and changes over time.

CLARA Personnel members must ensure traceability of inputs, outputs, and decision-making processes, enabling meaningful auditing and accountability.

Collaboration and Multidisciplinary Design:

AI systems should be developed with input from multidisciplinary teams, including experts in ethics, law, human rights, and domain-specific knowledge, to ensure that AI is designed and deployed in a socially responsible manner. All CLARA Personnel should refer to and comply with the AI Act.

3.4. Obligations

3.4.1. All CLARA Personnel

Each member of CLARA Personnel is obliged to:

- Ensure all sources are properly cited using an appropriate and consistent referencing style.
- Maintain records of all relevant sources consulted during research and writing.
- Review and verify that submitted work is original and properly attributed.
- Accurately record and report all relevant data collected through valid research methods.
- Maintain complete and verifiable records of research activities and results.
- Ensure transparency and reproducibility in data collection, analysis, and presentation.
- Promptly correct any unintentional errors discovered in data reporting.
- Ensure that all relevant data and research processes are recorded and reported accurately and transparently.
- Preserve original records, including raw data and lab notes, in accordance with institutional and funding agency guidelines.
- Disclose any limitations or uncertainties in the research results.
- Refrain from selective reporting or manipulation of findings.
- Disclose the use of AI tools in all stages of research, publication, and communication.
- Ensure the transparency, explainability, and traceability of AI systems used in research.
- Validate AI models for fairness, accuracy, and potential harm.
- Protect sensitive and personal data in compliance with data protection laws.
- Refrain from using AI to deceive, mislead, or plagiarize.

3.4.2. Director

The Director is obliged to

- Foster a research culture based on ethical standards.
- Provide training and guidance in responsible research and AI use.

4. Specific provisions

Following provisions are mandatory only to the CLARA Coordinator (INDRC and its personnel). Other CLARA Partners are encouraged to follow this recommended practice:

- INDRC Personnel must complete training pertaining to AI within six months of onboarding, with refresher training every two years. The Director has the right to require any INDRC Personnel member to complete training pertaining to AI at any time, depending on the specific circumstances and needs. This obligation may apply prior to the INDRC Personnel member's onboarding or at any point during their engagement, including outside the regular two-year refresher training cycle. INDRC Personnel is expected to comply with such requests promptly and fully, as part of their responsibility to maintain up-to-date knowledge and safe practices in working with AI technologies. The training will be available at bozp-system.cz and will be used both in the Czech and English version.
- Non-compliance with this Policy may result in disciplinary actions as applicable, such as:
  - Retraction or correction of published work.
  - Disqualification from research funding or future projects.
  - Employment-related actions, up to and including termination.
  - Agreement-related actions, up to and including termination.
  - Notification of external bodies (e.g., funding agencies, publishers, professional associations).
  - Other legal consequences, where applicable.