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ANR Policies on Ethic, Scientific Integrity and Deontology

OPERATIONAL PRINCIPLES AND PROCEDURES



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Introduction

Nowadays, thanks to the media attention given to new discoveries, society is highly aware of the issues associated with technological advances and science needs a new ethical reflection on those issues. This reflection is already well underway and often implemented at national and international level. Responsible research conduct is a key factor in ensuring the quality and influence of research, in the sustainability of public investment and, in maintaining a bond of trust and transparency with society on the use of public funds.

Research involves making choices at every step, and it occurs in a more and more complex environment: an increase in data quantity and sharing, changes in the scale of work, new tools and methods, multidisciplinary and international collaborations, interaction between public research and private sector, and information availability to society. The proliferation of scientific publications on the world stage coupled with growing competition between researchers to reach innovative results and to obtain financial resources intensify the pressure, especially on project evaluation procedures. Increasingly fierce competition demands intensified vigilance as well as a reminder that healthy competition should not be replaced by a race for recognition and fundings.

Developing a culture of ethic, scientific integrity, deontology and social responsibility of science must be at heart of the concerns of funding bodies, a priority for research and higher education institutions and organisations, and for researchers as well. As a public institution whose main role is to organise the funding of project-based research, ANR promotes a culture of honest

and responsible research and is committed in ensuring compliance with ethical principles in the performance of its activities. To guarantee equal treatment between applicants and to prevent conflicts of interest, the Agency adopted a Code of Ethics in 2009, which was revised in 2018⁽¹⁾ to include scientific integrity and gender equality.

This Code of Ethics states the general values, principles and rules of actions and behaviours that the Agency external and internal collaborators and administrators as well as those involved in a submitted or funded project, their potential partners and the beneficiaries of fundings commit to respecting in the work they carry out for the Agency or that they carry out with its financial support. In the event of a breach in these rules, the ANR must take appropriate measures.

Simultaneously, training courses on deontology principles and the prevention and management of conflicts of interest are offered to provide better support for collaborators and to ensure that the rules are respected, which is an essential condition for maintaining the bond of trust between society and those involved in research.

The purpose of this document is to set out the policy deployed by the Agency and the procedures put in place. The principles and procedures stated in this document apply to all ANR activities including the Work program or the calls implemented as part of France 2030.

1. <https://anr.fr/en/anrs-role-in-research/commitments/scientific-integrity/>

Ethic, scientific integrity and deontology principles

While each of these notions refers to distinct aspects of research, they are nevertheless subject to a reflexive approach aimed at ensuring the robustness and relevance of all research and are inseparable because often intertwined. Committed to supporting honest and responsible research, the ANR pays particular attention to these notions as part of its missions, in particular through the research projects submitted in response to the calls for projects launched by the Agency and which are subject to peer review, as well as projects funded by the Agency.

— Ethic

While research is an essential element in the development of society, the advancement of knowledge must never take precedence over the well-being and integrity of the individual and the community.

Therefore, the ANR demands that the following fundamental principles are respected:

- The recognition of the dignity of the human person, respect for people, animals and the environment;
- No discrimination on the grounds of age, sex, gender, ethnic, national or social origin, religion or belief, sexual orientation, language, disability, political opinion, social or economic status;
- Betterment of community;
- Honest and rational use of public funds;
- Fair and equitable sharing of the benefits of research.

While ethic questions the progress of science and its repercussions for society⁽²⁾, it consists in a reflective approach and it forms a basis for developing the practice of research depending on the contexts. It ensures, as well, the integrity and responsibility of science.

Ethic, as a reflexive approach, is therefore inseparable from the social responsibility of science, scientific integrity, and deontology.

ANR asks research teams to integrate into their research process a reflection on the ethical issues that could be raised by the objectives, the methodology or the expected results in their research project and their applications.

The Agency also asks the scientists involved in the evaluation process to pay attention to the ethical issues of the projects to be evaluated based on the defined and published evaluation criteria.

— Scientific integrity

Scientific integrity refers to the set of rules and values that must govern research activity to ensure that it is honest and scientifically rigorous. The ANR⁽³⁾ must promote it as it is an essential condition for maintaining the trust placed by society in those involved in research.

The rules and values that govern honest research activity are defined for each of the scientific areas in accordance with their specific characteristics. They cannot be set in stone and must be subject to ongoing reflection and evolve in the light of new knowledge and technological advances.

The variety of research disciplines, the state of the art of knowledge, the influence of factors outside the research activity itself, as well as the difficulty of gathering tangible evidence, make it difficult to define exhaustively and precisely the practices that may constitute a clear breach of scientific integrity.

It is the responsibility of every researcher in his or her day-to-day work to be aware of the recognized good practices in his or her field and to rigorously apply them to their work and to their published results, so that those practices can be subjected to criticism by the scientific community and can be used by anyone.

It is also the responsibility of the research operators to ensure that these good practices are disseminated and that the scientific communities are aware of them. The operators are also responsible to make sure that these requirements are complied with and for investigating any admissible reports of possible breach.

As such, research establishments and organisations involved in an ANR-funded project in which a breach of scientific integrity is or has been perpetrated must inform the ANR. In the same way, they must inform the ANR of any proven breach of scientific integrity by a researcher involved in a project funded by the ANR.

Committed to contributing to the deployment of a framework that favours research integrity and the conduct of responsible science, ANR has put in place measures to support all the research stakeholders.

In order to support the adoption of best practices in research evaluation and not to reinforce the pressure to publish, the ANR is a signatory of the Declaration Of Research Assessment (DORA) since 2018. In 2022, with cOAlition S, OPERAS and Science Europe, the ANR launched an Action plan for Diamond Open Access⁽⁴⁾ and has integrated CoARA⁽⁵⁾ since its creation in 2023. To this end, the ANR asks applicants to refrain from mentioning bibliometric indicators in their documents, and asks scientists participating in evaluation activities not to use them as an evaluation criterion.

Because the application of research results can have potential and differentiated consequences for women and men, particularly in terms of health, social, cultural or environmental, the ANR asks applicants to consider the sex and/or gender dimension in their research content.

In line with national policy in favour of open science, a Data Management Plan⁽⁶⁾ is required from the coordinators of funded projects. This plan describes how data is produced, documented, (re)used, managed and shared during and after the end of the project. This aims to help the reflection on research data in order to make them FAIR (Findable, Accessible, Interoperable, and Reusable). Those plans, standardized at European level on the basis of the recommendations of Science Europe of which ANR is a member, are fully in line with research practices and contribute to the respect of scientific integrity.

— Deontology

Deontology is the set of rules and duties specific to the exercise of a profession⁽⁷⁾. Those set out in the ANR code of conduct govern the performance of the missions of the Agency missions, and are binding on its internal and external collaborators. It is a code of conduct that they must respect. The quality of the evaluations and selections carried out within the Agency, as well as the relationship of trust with the scientific communities and society, depend in particular on compliance with these principles.

The common fundamental principles of probity, professionalism, independence and impartiality constitute behaviours to be followed by all internal and external employees of the Agency.

In addition, the ANR internal and external collaborators, members of the ANR Board of Directors as well as those of the ANR Scientific Steering Committee, and members of the Evaluation Committees (Work program and France 2030) are bound by professional secrecy and the obligation of professional discretion, for example with regard to information they may have become aware of in the course of work carried out as part of their mission or function for the ANR. Furthermore, they undertake not to use these data for personal purposes.

The application of these principles is based in particular on a procedure for managing conflicts of interest.

2. See page 8 of *Bilan et propositions de mise en œuvre de la charte nationale d'intégrité scientifique*: <https://www.vie-publique.fr/files/rapport/pdf/164000397.pdf>

3. Lettre-circulaire n°2017-040 du 15 mars 2017 (NOR : MENR1705751C) du Secrétaire d'État chargé de l'Enseignement supérieur et de la Recherche relative à la politique d'intégrité scientifique au sein des établissements d'enseignement supérieur et de leurs regroupements, des organismes de recherche, des fondations de coopération scientifique et des institutions concourant au service public de l'enseignement supérieur et de la recherche, ci-après dénommés "opérateur(s) de recherche", et au traitement des cas de manquements à l'intégrité scientifique: <https://www.legifrance.gouv.fr/download/pdf/circ?id=41955>

4. <https://anr.fr/en/latest-news/read/news/action-plan-for-diamond-open-access/>

5. Coalition for advancing research assessment: <https://coara.eu>

6. https://anr.fr/fileadmin/documents/2019/ANR_DMP_Template_EN.pdf

7. <https://www.cnrtl.fr/definition/academie9/deontologie>

An operational procedure

In coherence with the Mandon circular and the Corvol report, a Scientific Integrity Officer (SIO) was appointed at the ANR in 2018. Her/His role was confirmed by the decree of December 3rd 2021 which requires the concerned institutions to appoint a scientific integrity officer. Her/his contact details are available on the ANR website⁽⁸⁾ and on the Office français de l'intégrité scientifique⁽⁹⁾, the national network of scientific integrity officers, dedicated webpage.

Procedures provide a framework for the ANR activities and in particular for the management of alerts relating to ethical conduct or scientific integrity as well as deontology such as the respect for fundamental principles, the management of conflicts of interest and confidentiality.

Prevention and promotion of best practices are essential, and the ANR has included in its training program for all its internal staff sessions dedicated to commitments, particularly those relating to ethic, to scientific integrity and to professional conduct.

Agency Work program with texts for calls for projects and for calls for France 2023 underline the Agency policy and commitments which are also presented to the scientific communities during communication events such as "Les Rendez-vous de l'ANR".

Since those dimensions are at the core of the evaluation of submitted projects to calls launched by the Agency, scientific integrity training for committee chairpersons is also integrated throughout the selection processes.

— Procedure for managing reports of breaches of ethic or scientific integrity

The ANR has adopted and presents here part of the procedure, proposed by the National Network of Scientific Integrity officers, of handling reports to acknowledge its rigor and to ensure consistency of practice between various operators.

Making a report

On a problem related to the evaluation of a project

Any person acting in good faith who is aware of an ethical problem or a possible breach of ethic or scientific integrity which occurred within the evaluation of a project at the ANR, or within the framework of an evaluation mission entrusted by the ANR, may send a report to the ANR Scientific Integrity Officer. The report must be made in writing, in a letter or an email. It must concern serious and documented facts.

Anonymous reports are not accepted. If a person has doubts as to whether the facts in question justify a report, he or she may question the ANR Officer beforehand, including anonymously.

On a problem related to the conduct of research submitted to or funded by ANR

Any person acting in good faith who is aware of an ethical problem or a possible breach of scientific integrity which occurred within a project under evaluation, funded or having been funded by the ANR or by a person involved in a project funded by the ANR may send a report to the Scientific Integrity Officer of the organisation or institution employing the involved person. The officer must then inform the ANR's Officer. Questions relating to the execution of research, communication and the promotion of research should be addressed to the Scientific Integrity Officer of the organisation or institution employing the person or people concerned.

All reports will be dealt with on a case by case basis and, when appropriate, in conjunction with the operators' officer.

Admissibility of an alert

The ANR Scientific Integrity Officer promptly acknowledges receipt of the report to the sender, assures the confidentiality and reminds her/him of its duty of discretion. The Scientific Integrity Officer checks that the report concerns a possible breach of ethic or scientific integrity falling within the ANR area of responsibility. Otherwise, the Scientific Integrity Officer directs the sender to the appropriate contacts (Scientific Integrity Officer at her/his institution, Ombudsman, Ethics Officer, Whistle-blower Officer, Human Resources or Legal Affairs Department, Data Protection Officer at the institution to which he/she is attached, Deontology Committee, etc.).

The ANR Scientific Integrity Officer also checks that the report is sufficiently well-founded to be able to conduct an instruction procedure. Finally, to avoid parallel procedures, the Scientific Integrity Officer validates that the described facts are not under disciplinary or legal proceedings.

General principles

- The investigation of breaches carried out under the responsibility of the Scientific Integrity Officer must be fair, adversarial, exhaustive and conducted with independence, rigor and objectivity.
- The confidentiality of the information and, as far as possible, the anonymity of the concerned people must be respected.
- All this information must be archived securely and disclosed only to whom it may concern whenever necessary.
- The people behind reports must be protected from possible reprisals, during and after the investigation.
- Anyone suspected of misconduct must be protected by ensuring that they are presumed to be acting in good faith until proven otherwise.
- Care should be taken to identify any links of interest that might appear to influence the people approached for the appraisal.
- Respondents must be informed of the issues involved, so that they can respond fully and present evidence to support their claims.
- Where appropriate, implement any actions required to restore the reputation of people who may have been wrongly suspected.
- Ensure the implementation of any sanctions, corrective and preventive actions following the handling of the case.

If the report is admissible, the Scientific Integrity Officer informs the person or people implicated and explains the stages of the procedure. By way of exception, where precautionary measures are necessary to prevent the destruction of evidence relating to the breach, the person or people in question shall not be informed until such measures have been implemented.

If the report concerns several research operators, the ANR Scientific Integrity Officer who received the report opens a co-instruction. All Scientific Integrity Officers of the different entities involved designate a Scientific Officer Coordinator who will have the responsibility to lead the procedure diligently. If the report concerns several areas (e.g. scientific integrity, deontology, data protection), the ANR Scientific Integrity Officer takes all appropriate coordination measures to ensure that the report is handled aptly, while respecting confidentiality.

In doubt on an ethical breach in a research project being evaluated at the ANR, the Scientific Integrity Officer investigates with the chairperson of the concerned committee that the elements provided in the proposal are not sufficient for the committee to issue a scientific opinion on whether the research is ethical, based on the evaluation criteria. In case the committee feels that there are not enough elements, it can contact the ANR Scientific Integrity Officer who may ask the project coordinator for further details.

Investigation

The investigation of the report must be carried out with care, thoroughness, transparency, uniformity of treatment and objectivity, in respect of the rights of all parties involved and the necessary condition for the full gathering of information

that all people concerned wish to provide. Throughout the enquiry, every effort will be deployed to diligently carry out a thorough and documented investigation. This includes gathering all relevant information, investigating all the evidence, auditioning every person implicated, possibly the person who issued the alert and any other person reasonably identified as having information to provide. The people involved shall be informed of the principles and stages of the procedure, and the people implicated shall be given the opportunity to provide any evidence they consider useful.

The instruction must establish and trace:

- A complete record of the reported facts;
- A meticulous description of the established facts;
- The arguments put forward by each of the defendants and any verifications that may have been made;
- An analysis strictly based on the established facts;
- If assumptions are made, they must be presented as such, and their limits are explained.

To determine the nature and extend of the breach of integrity or to qualify the ethical problems, external experts in the concerned scientific domain are systematically consulted.

Once the investigation is considered complete, a pre-report is drawn up, a copy of which will be communicated confidentially - if this is made possible by the applicable rules - to the respondent(s) for comments within a given timeframe.

8. <https://anr.fr/en/anrs-role-in-research/commitments/scientific-integrity/>

9. <https://www.ofis-france.fr/page-directory-of-research-integrity-officers-ris/>

Ad hoc committee review

At the end of the instruction, the ANR Scientific Integrity Officer convenes an *ad hoc* committee with experts in the concerned scientific field(s), the chairperson of the committee that evaluated the project, the director of the scientific operations and/or the head of the concerned scientific department of the ANR, or head of the major government investment programs and/or the head of the action concerned (procedures/ France 2030 projects), the ANR Scientific Integrity Officer and, depending on the case, the representative of the institution concerned. The members of this committee receive the pre-report⁽¹⁰⁾ and all the documents after having signed a declaration of conflicts of interest and confidentiality engagement. The ANR Scientific Integrity Officer completes the pre-report with the committee's analysis and input. The *ad hoc* committee members' name may be made public.

The submission of these documents to the managers of the operators concerned completes the instruction phase.

In the case of reports concerning a project currently being evaluated, the instructions will be carried out in parallel and separately from the evaluation process. The instruction report and the informed decision must, as far as possible, be submitted before the end of the selection process.

Decision

If there is no ethical problem nor breach of scientific integrity

Follow-up measures include any necessary action to rehabilitate those wrongly accused (publication of the conclusion of the instruction, statement from the institution or organisation). Simultaneously, the condition of the report will be explored in order to detect and punish any abusive reports made in bad faith or with malicious intention.

For a project currently being evaluated, the project remains in the evaluation process.

For a project that is currently being funded, the funding is maintained.

If there is an ethical problem or a proven scientific integrity breach

Sanctions will be defined and applied according to the nature and intensity of the breach. They may consist of the suspension of the right to submit to an ANR call for projects for a fixed period and/or the participation in the evaluation or expertise of project(s) as part of the selection process for the ANR calls for projects. The project coordinator is notified as well as the representative of the employing institution.

10. The pre-report and the report may contain sensitive data, such as personal information. Such sensitive data will be treated in accordance with the applicable texts.

In the case of a project under evaluation, the project is withdrawn from the evaluation process in which it is involved. Additional sanctions may be imposed, such as suspension of the right to submit to an ANR call for projects for a fixed period and/or participation in the evaluation or expertise as part of the selection process for the ANR calls for projects. The project coordinator is notified as well as the representative of the employing institution.

In the case of a project currently being funded, the ANR reserves the right to terminate the funding or to recover all or part of the sums already paid in accordance with the provisions set out in the ANR financial regulations or in the France 2030 funding contracts. The project coordinator is notified as well as the representative of the employing institution or the coordinating institution for France 2030.

Archiving

The report, recommendations, and evidence on which they are based are archived under the responsibility of each Scientific Integrity Officer in a dedicated and secure place (encrypted if possible) provided for this purpose by the operator. These documents are only accessible to the Scientific Integrity Officer in office who guarantees that they will exclusively be transmitted to authorized people.

— Managing links of interest and conflict of interest

A conflict of interest arises from a situation in which a person's links of interest are likely, by their nature and intensity, to call into question her/his impartiality or independence in the assigned mission regarding the proposal evaluation.

Intensity of the link of interest

A major link of interest

This type of link of interest does not in itself imply the existence of a conflict of interest. The risk of conflict is high when the link of interest applies to the activity in question. This leads to a presumption of a conflict of interest.

Another link of interest

This type of link of interest does not avoid any risk of conflict of interest. This risk is minor, there may be a presumption of absence of conflict of interest.

The intensity of the link depends on:

- The frequency of relations which build the links (frequent, regular, occasional);
- The length and continuity of the links;
- The benefits received or potentially perceptible under the links.

Foreseeable impact of the links of interest on the task must be considered according to:

- The importance of the collaboration;
- The area of expertise;
- The type of expertise (individual or collective, collegiality may decrease the impact of the links);
- The expertise weight in the evaluation process.

Consequently, the ANR must refrain from choosing internal and external collaborators susceptible to often have conflicts of interest considering major links of interest. However, if a major link is only present in one proposal, the collaborator does not have to resign but must withdraw herself/himself when the proposal is assessed.

Links constituting a conflict of interest

The links listed below may constitute a conflict of interest considering their intensity and time frequency

Past or present collaborations:

- Lab or research team;
- Implication in a research project (ANR, ERC, ERA-Net, France 2030...).

Co-publications:

- First authors;
- For less than 5 years.

Hierarchical relationships including:

- PhD supervisor;
- Post-doc supervisor.

Personal relationships.

Declaration of conflict of interest

The prevention of conflict of interest can only be achieved under transparency condition implemented by a mandatory declaration of conflict of interest considering the missions that may be given by the ANR.

- 1) An internal or external member of ANR staff who does not sign a declaration of links of interest may not take part in the work for which he/she has been commissioned.
- 2) The declaration of links of interest must be drawn up when taking office, submitted to the competent authority and updated.
- 3) This declaration is the responsibility of the declarant, who must ensure that it is true and complete.
- 4) A member of staff, whether internal or external to the ANR, must demonstrate the utmost transparency regarding any interests likely to influence (even if only in appearance), positively or negatively, the decision-making process.
- 5) A member of staff, whether internal or external to the ANR, must be impartial and cannot be judge and party. He/she must therefore undertake not to be a project coordinator or

scientific partner manager of projects submitted to a scientific evaluation committee of a call for proposals for which he/she is involved in the evaluation and/or selection process.

6) An internal or external collaborator to the ANR must ensure, before participating in an evaluation, that he/she does not have to evaluate (a) project(s) for which there is a link or conflict of interest between him/her and the researcher or one of the researchers involved in the said project(s). In this case, he/she must inform the ANR without delay and, at the very least, declare any interests of any kind.

7) Any person acting in good faith who is aware of an undeclared conflict of interest between a member and a project during the evaluation process may send a report to the committee chairperson, the ANR staff in charge of the committee and, if not, to the ANR Scientific Integrity Officer who will investigate the report with the ANR staff in charge of the committee and a representative of the operational directorate concerned. If the link is proven, the ANR takes the appropriate decision, which may include exclusion of the member from the evaluation committee, as a minimum within the framework of the current process.

Managing conflicts of interest during the committee meeting

Conflicts of interest that may arise in the course of the evaluation process, particularly in the context of evaluation committees, must be properly handled.

- 1) The committee member must refrain from making any comments or interventions likely to influence decision-making when they have a positive or negative link of interest with a project leader or team.
- 2) The committee member must undertake to leave the room, or to remain in the waiting room when the committee is being held by videoconference, for the duration of the examination of the proposal in question.
- 3) The committee member must refrain from making any comments during the deliberations on the proposal in question when the proposals are finally ranked.
- 4) The committee's minutes must state the declared links of interest. It must mention, for each case, the reasons and the committee's decision on the management of links that have been recognized as constituting conflicts of interest.

The ANR may terminate the mandate of a committee member in the event of a breach of ethics or of the rules of this procedure. Any breach suspected or observed by an ANR employee is reported to the Scientific Integrity Officer for investigation at any time in the process. A proven breach may result in a simple verbal warning from the ANR staff or a written warning from the Director of Scientific Operations or

the Director of major government investment programs. Depending on the extent of the breach, it may be decided to terminate the committee member's mandate and impose sanctions. If the member whose term of office is terminated was Vice-Chairperson, the vacant Vice-Chairmanship shall be offered to another member of the Committee. If the member was the Chairperson, the position may be offered to the Vice-Chairperson as a priority.

— Procedure for handling of suspected conflicts of interest⁽¹¹⁾

Appeals or requests from project coordinators following ineligibility or non-selection decision which they are recipient are instructed by the ANR in a three-months period following its reception. This period must in all cases be compatible with decisions that might be taken following these appeals (see below).

ANR collects, checks, and keeps all the information necessary to manage those appeals:

- Conflict of interest declaration from experts and members of the committee;
- Minutes from the committee;
- Opinion of the concerned ANR department;
- Opinion of the scientific operation department of the ANR or direction of major government investments.

The Chairperson of the committee, or the Vice-Chairperson if the potential conflict of interest concerns the chairperson, – is informed of the appeal and provide any additional information required for its investigation.

The application of the criteria listed above is subject to a new analysis by the ANR in the light of all this information.

Following the end of the instruction, according to the presence or not of a conflict of interest, its seriousness and impact on the taken conclusion, the following decisions can be made:

- Re-examination of the proposal or pre-proposal;
- Continuing the evaluation process;
- Maintaining the initial decision (if the conflict of interest is not such as to call the decision into question, particularly with regard to the quality of the project).

Project or establishment coordinator are informed on the decisions relating to the handling of the conflict of interest.

11. More generally, any request from an applicant whose project has been the subject of a non-selection decision and which raises the question of a conflict of interest in the selection procedure.

12. <https://anr.fr/fileadmin/documents/2019/ANR-Ethics-and-Scientific-Integrity-Charter-2019-v2.pdf>

13. <https://anr.fr/en/funding-regulations/>

14. Each France 2030 call is governed by specific financial regulations available on the call page

15. <https://anr.fr/fr/lanr/engagements/lintegrite-scientifique/>

16. <https://anr.fr/fr/lanr/engagements/lintegrite-scientifique/>

Additional related texts

- The ANR's Ethics and Scientific Integrity Charter⁽¹²⁾
- Funding regulations^{(13) (14)}
- Confidentiality Undertaking Form⁽¹⁵⁾
- Declaration of Interests Form⁽¹⁶⁾

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