Research Integrity Policy Statement

This statement provides the University's response to the UK *Concordat for Research Integrity* (2012) prepared by Research Councils UK (RCUK) and endorsed by the Minister for Universities and Science. The statement is intended to inform RCUK, the Higher Education Funding Council for England (HEFCE), the academic community, other funders of our research, and the public more broadly, about how the University of Sussex addresses matters of Research Integrity and seeks to foster a culture of professional integrity.

The Concordat seeks to provide a comprehensive national framework for good research conduct and its governance. As signatories to, and supporters of, the Concordat to support Research Integrity, University of Sussex is committed to:

• maintaining the highest standards of rigour and integrity in all aspects of research
• ensuring that research is conducted according to appropriate ethical, legal and professional frameworks, obligations and standards
• supporting a research environment that is underpinned by a culture of integrity and based on good governance, best practice and support for the development of researchers

• using transparent, robust and fair processes to deal with allegations of research misconduct should they arise
• working together to strengthen the integrity of research and to reviewing progress regularly and openly

The principles and governance arrangements are elaborated in the statement. This policy is overseen by the University Research Governance Committee (URGC) on behalf of the University, and will be reviewed annually.

A message from Professor Adam Tickell

Throughout our history, academics and researchers at the University of Sussex have made transformational interventions in their fields and created new ones. Our research has enhanced understanding and improved lives. Great research depends upon the highest standards of integrity in its design, execution and governance. The University is fully committed to the UK Concordat for Research Integrity and our Research Integrity statement is an important codification of our values.

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Professor Adam Tickell, Vice-Chancellor
University of Sussex
September 2017

Research Integrity
Summary of activities 2016-17

The following activities and initiatives supported the University's commitment to research integrity in 2016-17:

- Full review and updating (following wide consultation) of the University's *Research Governance Standard Operating Procedures*
- Updates and enhancements were introduced to *the Procedure for the Investigation of Allegations of Misconduct in Research* including explicit processes for the investigation of allegations against research postgraduate students.
- Training sessions were held for staff and research postgraduate students on research ethics and research integrity.
- Further embedding of the operation and activities of the Animal Welfare and Ethical Review Body (AWERB) operational review group to ensure more effective and regular consideration of research activity

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Research Integrity

The University of Sussex is committed to promoting and upholding the highest quality academic and ethical standards in all its activities. The University's approach to Research Integrity has been to develop Research Governance policies and procedures that recognise the importance of addressing matters of ethics and integrity, while supporting the achievement of its collective research objectives. To this end, robust Research Governance policies and procedures underpin all research at the University, which is supported by training and guidance.

The University Research Governance Committee (URGC) is responsible for approving policies and guidelines for the conduct of activities with implications for research governance. The Committee also ensures that across the University there are robust procedures for the consideration and conduct of activities with implications for Research Governance, Ethics and Integrity.

From April 2014, Research Councils UK (RCUK) has incorporated assurance questions into the standard RCUK Assurance Programme of Research Organisations in receipt of RCUK funding. These questions have been informed by the UK Concordat for Research Integrity (2012).

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The statements below are in direct response to the RCUK assurance questions:

1. Please confirm that you have policies and procedures in place that meet Research Integrity and Ethics requirements, including processes for dealing with allegations of misconduct. How often are these reviewed and when were they last reviewed?

i. Procedure for governing good research practice

The University fully endorses the UK *Concordat to Support Research Integrity* by promoting research excellence and ensuring that research reflects the highest standards. The University has issued a Research Integrity Policy Statement which it reviews and updates annually:
http://www.sussex.ac.uk/research/standards

The University has a robust Research Governance and Ethical Review Framework underpinned by the following documents (last review date in parentheses)

- *Research Governance Standard Operating Procedures* (June 2017)
- *Procedure for the Investigation of Allegations of Misconduct in Research* (December 2016)
- *Code of Practice for Research* (April 2017)
- *Research Integrity Policy Statement* (October 2017)
- *Grievance Procedure* (February 2012)
- *Fraud Response Plan* (May 2015)
- *Whistleblowing Policy* (October 2013)

These policies were last updated as indicated above and are reviewed on a rolling basis.

ii. Process for dealing with Allegations of Research Misconduct

The process is detailed in the '*Procedure for the Investigation of Allegations of Misconduct in Research'* The URGC is responsible for the policy and the Deputy Vice-Chancellor is responsible for the procedure.

iii. Investigating and reporting unacceptable research conduct (that meets requirements set out in the Concordat to Support Research Integrity (2012) and the RCUK's code of conduct and policy on the governance of good research conduct (2009))

The *Procedure for the Investigation of Allegations of Misconduct in Research* (December 2016) is linked to the University's disciplinary procedures, with the operation of the Procedures being the responsibility of the Deputy Vice-Chancellor

supported by the Research Governance Officer*. The Procedure for the Investigation of Allegations of Misconduct in Research* (2016) does not state that it follows the requirements set out in the *Concordat to Support Research* (2012) due to overlap in publication dates; however, it does address the principles. The policy acknowledges the RCUK's *Code of Conduct and Policy on the Governance of Good Research Conduct* (2009). The *Concordat to Support Research Integrity* will be referenced in any future revisions.

2. Please provide the publicly accessible web links to these policies and the name of the senior officer responsible for dealing with cases of misconduct.

Publically accessible web-links

The web-links for the relevant policies are the following:

- *Procedure for the Investigation of Allegations of Misconduct in Research* (December 2016)
- *The Code of Practice for Research* (April 2017)
- *Research Governance Standard Operating Procedures* (June 2017)
- *Grievance Procedure* (February 2012)
- *Fraud Response Plan* (May 2015)
- *Whistleblowing Policy* (Oct 2013)

The senior officer responsible for dealing with cases of misconduct is Professor Saul Becker, Deputy Vice-Chancellor.

Section D of the *Procedure for the Investigation of Allegations of Misconduct in Research* (December 2016) states that:

> *…initial allegations of misconduct in research should be made to the Deputy Vice-Chancellor. If the Complainant is not a member of the University, he/she should still make an initial allegation of misconduct in research to the Deputy Vice-Chancellor. The Complainant must provide as detailed a statement as possible in writing in support of the allegation.*

It is not mandatory for the initial allegation to be directly communicated to the Deputy Vice-Chancellor. The complainant may raise a concern, in the first instance, with a Head of School or Unit, line manager, a trade union representative, a member of the Students Union or a colleague and ask that person to bring the matter forward on their behalf.

In the event that there is a conflict of interest for the Deputy Vice-Chancellor the allegation can be directed to the Director of Planning, Governance and Compliance.

The policy states which individuals within the University, relevant funder(s) and statutory bodies are informed by receiving documentation of the initial allegation, investigation (preliminary and formal) and subsequent action.

3. How are these policies disseminated to staff? Please indicate if any special provision is made for new employees (including post-graduate students) and also how staff awareness is maintained.

The Code of Practice for Research (April 2017): Observance of the Code (Item 1.2.1) states:

> *All staff and students engaged in research, and any others engaged in research within and/or for the University, must familiarise themselves with the Code and ensure that its provisions are observed. Heads of School, Directors of Research & Knowledge Exchange, and Principal Investigators have a responsibility to ensure that the highest standards of research integrity, governance and ethical practice are met, that research activities are undertaken in compliance with the Code amongst staff and students under their supervision, and to seek to foster a culture of openness and professional integrity in research practice. The University will draw attention to the Code in its induction processes for newly appointed teaching and research faculty. Supervisors of students engaged in research will seek to ensure compliance with the Code on the part of such students and will direct students to any additional training or support that may be required.*

The University of Sussex *Research Governance Standard Operating Procedures* (2017, p36) states that "*regular communication with Cross School Research Ethics Committee Chairs and support staff will ensure that new developments/requirements in ethical review are effectively disseminated*". Staff are required to keep up-to-date with policy. Policy updates are communicated to all staff through Heads of School and Directors of Research and Knowledge Exchange in each school. The standard letter of appointment for academic and research staff includes reference to the *Code of Practice for Research* (2017).

A Researcher Development Programme is led by the Doctoral School. The Research Governance Officer provides termly workshops on Ethical Review and 'Ethical issues in research' which covers research conduct. The 'Ethical issues in research' workshop benefits from an external speaker from the UK Research Integrity Office.

4. Please outline any actions and activities that have been undertaken to support and strengthen understanding and application of research integrity issues (for example, postgraduate and researcher training, or process reviews).

The University is planning to deliver a comprehensive programme of training in research ethics for School Research Ethics Officers (SREOs), Cross-School Research Ethics Committee (C-REC) members, research supervisors, research students and research staff using both internal staff and external trainers.

The University is planning the implementation of a University-wide mechanism for a light-touch audit of projects to review Quality Assurance and Research Integrity in the coming academic year.

In the course of 2016-17 a detailed review of the University's Research Governance Standard Operating Procedures was undertaken including updates to processes for Sponsorship, information about the Human Tissue Act, guidance on due diligence for applications and insurance for overseas travel for research and the requirements for legal support provided by the Contracts and Intellectual Property Team.

5. The Research Councils expect that the research they support will be carried out to a high ethical standard. Please explain the arrangements you have in place for reviewing that any research funded by the Councils is planned and conducted in accordance with such ethical standards.

Robust research governance procedures and policies underpin all research conducted by staff and students at the University. This is supported by ethical review, guidance, training and good ethical practice across the University.

Individuals with responsibility for undertaking ethical review (School Research Ethics Officers and Research Ethics Committee members) are invited to receive annual training and are able to request expert guidance from the Research Governance Officer as and when queries arise or support is required.

Ethical review at the University takes into account the level of risk associated with any project in order to ensure that the review process is proportionate:

- Low-Risk Undergraduate (UG) and Postgraduate Taught (PGT) student research projects are reviewed at School level by their Supervisor and their School Research Ethics Officer.

- All Staff and Postgraduate Research (PGR) student projects are reviewed by a Cross-Schools Research Ethics Committee (C-REC). Higher risk UG and PGT student projects also go to a C-REC for review.
- Research from the Brighton and Sussex Medical School (BSMS) (all student and staff projects from the Medical School and projects that require ethical review from a clinical perspective e.g. a psychology project that involves fMRI scanning healthy volunteers, that require ethical review) is considered by the BSMS Research Governance and Ethics Committee (BSMS RGEC). The BSMS RGEC uses a specific ethical review application form, which is appropriate for clinical research, public health research and the collection, use and storage of human tissue and materials under the University's Human Tissue Authority (HTA) licences.
- In addition to the BSMS RGEC, the HTA Coordination Group oversees the governance of research with human tissue and biological material and coordinates operational issues at an institutional level. This group, with representation from each of the University's three HTA licences, provides an advisory function to ethical reviewers assessing new applications proposing research that may fall under the relevant legislation.
- There is a specialised Committee (the Animal Welfare and Ethical Review Board (AWERB)) that considers and reviews any research that involves non-human animal subjects (Animals (Scientific Procedures) Act (2012) (ASPA) and non-ASPA). An operational review group with a specialist membership meet regularly, in addition to the Committee, to resolve operational issues and promote best practice. The University is a signatory of the *Concordat on Openness in Animal Research (2014)*, a multi-disciplinary initiative led by Understanding Animal Research (UAR).

The Cross-School Research Ethics Committees report to the URGC. The URGC oversees the ethical review process, reviews and develops policies and procedures, and considers research governance, integrity and ethical issues.

In the context of externally-funded research proposals, applications for ethical review will normally be made once external funding has been approved, rather than at the point of application. However, as a matter of good practice, all bids for external funding are subject to internal peer review prior to submission; this should include consideration of ethics. The Research Governance Officer is available for pre-award queries from researchers for example around methodology or research design to support a funding application.

For research that falls under the Health Research Authority (formerly Department of Health led) Research Governance Framework and requires Social Care Research Ethics Committee or NHS Research Ethics Committee approval, the University has a sponsorship request process which involves a risk assessment. The University meets the responsibilities of Sponsor as defined by the Health Research Authority and other relevant authorities.

If a project raises new ethical concerns or amends its methodology, a revision or substantive amendment of the ethics application is submitted to the Committee that provided initial ethics approval.

The ethical approval process is supported by training on research governance, ethics and integrity and by guidance and policies, procedures and templates/examples to encourage best practice. Researchers are also encouraged to comply with and follow their professional code of ethical practice in addition to the University's Code.

The University has standard operating procedures and policies that cover procedures for reporting adverse and unexpected events and monitoring of ethical review processes. The University has a clear and robust policy and process for allegations of research misconduct together with clear guidance and policy on data protection and research data management. The implementation of a light touch monitoring and audit process is under development.

The Research Governance website gives a comprehensive overview of the ethical review system at the University. For more information, visit the University's Research Governance webpage[1] or contact the University's Research Governance Officer: rgoffice@sussex.ac.uk ; 01273 872748.

6. How many formal investigations of research misconduct have been completed in the past three academic years which relate to researchers funded by or responsible for funding from Research Councils (including supervisors of postgraduate awards)?

A summary of research misconduct allegations was first published in 2013. The aggregated record keeping of research misconduct allegations began in 2010. As required by RCUK, *figures are provided for the past 3 completed academic years with year 1 representing the most recently completed year* (Year 1: 2016-17, Year 2: 2015-16, Year 3: 2014-15). 'Academic years' refers to the period 1 October to 31 September.

[1] http://www.sussex.ac.uk/staff/research/governance

RC		Fabrication		Falsification		Plagiarism		Misrepresentation		Breach of duty of care		Improper dealing with allegations of misconduct		Other	
	Year	Completed	Upheld	Completed	Upheld	Completed	Upheld	Completed	Upheld	Completed	Upheld	Completed	Upheld	Completed	Upheld
AHRC	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0
BBSRC	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0
EPSRC	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0
ESRC	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0
MRC	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0
NERC	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0
STFC	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Total		**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**

Table 1 – Formal; investigations of research misconduct (RCUK funded research 2014-2016)

The following table shows instances of allegations of research misconduct *irrespective* of funding source.

	Number of formal investigations completed (academic years*)			**Number of allegations upheld (in whole or in part) (academic years)**		
	2014	**2015**	**2016**	**2014**	**2015**	**2016**
Fabrication	0	0	0	0	0	0
Falsification	0	0	1	0	0	0
Plagiarism	1	0	0	0	0	0
Misrepresentation	0	1	0	0	0	0
Breach of duty of care	0	0	1	0	0	0
Improper dealing with allegations of misconduct	0	0	0	0	0	0
Other (please specify)	0	1[a]	3[b]	1	1	0
(Details of any allegations upheld in part)				0	1[c]	1[d]
Total	**1**	**2**	**5**	**1**	**1**	**1**

***Academic year – 1 October to 30 September

Table 2 – Formal; investigations of research misconduct (all research- 2014-2016)

Key:

a. Publication misconduct

b. - Intentional non-compliance with (...) legal or ethical requirements for the conduct of research

   - Self-referral to the Procedure following formal retraction of a journal article
   - Personation (related to a PhD examination)

c. Partially upheld – respondents made to review international and institutional research guidance on the submission of articles to journals

d. d. Partially upheld - as there was no attempt to deceive, no further action would taken

A copy of the Procedure can be found on the Research and Knowledge Exchange web-pages[2].

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[2] http://www.sussex.ac.uk/staff/research/rqi/policy/research-policy