

RESEARCH ETHICS, INTEGRITY AND GOVERNANCE

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UNIVERSITY  
OF SUSSEX

# Code of Practice for Research

May 2022

\* Before use, please visit <http://www.sussex.ac.uk/staff/research/governance> to ensure that the last approved version is accessed \*

## CODE OF PRACTICE FOR RESEARCH

May 2022

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1.0	23 June 2017	First version.
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3.0	1 June 2022	Numerous updates reflecting changes to legislation or processes

## i. Overview and purpose

### Principles

- 1.1 This Code of Practice (“the Code”) sets out standards for conduct expected of all staff and students engaged in research (“the researcher”) in and/or for the University of Sussex (“the University”) based on the principle that research involves, *inter alia*, the pursuit of truth in furtherance of the advancement of knowledge.

To meet these standards, researchers should always -

- i. demonstrate integrity and professionalism;
  - ii. observe fairness and equity;
  - iii. avoid, or declare and manage, actual or potential conflicts of interest<sup>1</sup>;
  - iv. show care and respect for all participants in, subjects, users and beneficiaries of research including humans, animals, the environment (including genetic resources) and cultural objects (those associated with or involved in the research);
  - v. observe all legal, regulatory and ethical requirements laid down by the University or other statutory bodies<sup>2</sup>.
- 1.2 Research methods, results, outputs and data should, subject to appropriate confidentiality in relation to personal or commercially-protected information, be open to scrutiny, debate, sharing, further analysis and re-use. It is the expectation that those data arising from research will be managed well and archived to allow prompt sharing. All researchers should conduct their research in accordance with the University’s Research Data Management Policy<sup>3</sup>.
- 1.3 The University formally endorses the *UUK Concordat to Support Research Integrity* (2019)<sup>4</sup>. In addition, the Code draws on a number of other sources of guidance within the sector, including the RCUK Policy and Guidelines on Governance of Good Research Conduct (2013)<sup>5</sup>, the Singapore Statement on Research Integrity (2010)<sup>6</sup> and the UK Research Integrity Office *Code of Practice for Research: Promoting good practice and preventing misconduct* (2009, 2021)<sup>7</sup>.

### Scope

- 1.4 All staff and students engaged in research, and any others engaged in research within

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<sup>1</sup> Staff should also ensure that they understand and comply with the [Staff Code of Conduct and Declaration and Register of Interests](#) based on the "Seven Principles of Public Life" adopted by the Nolan Committee

<sup>2</sup> Serious research misconduct may also need to be dealt with under the University's Disciplinary Procedure (staff) (Regulation 31) or Student Discipline (Regulation 2) .

<sup>3</sup> <https://www.sussex.ac.uk/library/researchdatamanagement/policies>

<sup>4</sup> <https://www.universitiesuk.ac.uk/policy-and-analysis/reports/Pages/research-concordat.aspx>

<sup>5</sup> <https://www.ukri.org/files/legacy/reviews/grc/rcuk-grp-policy-and-guidelines-updated-apr-17-2-pdf/>

<sup>6</sup> <https://wcrif.org/guidance/singapore-statement>

<sup>7</sup> <https://ukrio.org/publications/code-of-practice-for-research/>

and/or for the University (such as collaborators on University funded projects), must familiarise themselves with the Code and ensure that its provisions are observed<sup>8</sup>.

## **2. Responsibilities**

### **2.1 Council**

2.1.1 Council, as the governing body of the University, monitors institutional effectiveness including the application of the Code and principles through the [Annual Research Integrity Statement](#)<sup>9</sup>.

### **2.2 Research and Knowledge Exchange Committee**

2.2.1 The Research and Knowledge Exchange Committee promotes and develop a strong research and knowledge exchange culture and ethos across the University, encouraging activity that is consistent with an internationally outstanding institution and a profile that matches the best universities at home and abroad. It serves to promote and exchange best practice in relation to the development of early career researchers. The Committee receives reports for information from the Research Ethics and Integrity Committee and provides advice to the Research Ethics and Integrity Committee on University policies and procedures for research governance and ethics.

### **2.3 Research Ethics and Integrity Committee (REIC)**

2.3.1 REIC recommends University policy on all areas of research ethics and integrity including good practice, risk management, human and animal ethics, and handling of misconduct, and approves relevant guidelines. It approves Schools' research governance and integrity structures and processes, and serves to advise, inform, and update School committees with regards to research ethics, governance and integrity.

### **2.4 Pro-VC (Research & Enterprise)**

2.4.1 The Pro VC (Research & Enterprise) provides dedicated leadership in Research and Enterprise including responsibility for ensuring that the highest standards of research integrity, governance and ethical practice are met and that that research activities are undertaken in compliance with the Code by staff and students. The Pro- VC (Research) seeks to promote and foster a culture of openness and professional integrity in research practice.

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<sup>8</sup> This Code applies to any person conducting research under the auspices of the University. This Code applies to any person conducting research under the auspices of the University, whether solely or in conjunction with others in the University or other organisations or in conjunction with other organisations, *including but not limited to*:

- i) members of staff;
- ii) students;
- iii) independent contractors or consultants;
- iv) a person with visiting or emeritus status; and
- v) a member of staff on a joint clinical or honorary contract

<sup>9</sup> <https://www.sussex.ac.uk/research/about/standards/research-integrity-policy-statement>

## **2.5 Director of Research and Enterprise**

2.5.1 The Director Research and Enterprise assists the Pro VC (Research & Enterprise) in ensuring that the highest standards of research integrity, governance and ethical practice are met, that research activities are undertaken in compliance with the Code by staff and students, and to seek and promote to foster a culture of openness and professional integrity in research practice. The Director of Research and Enterprise shall act as the Pro VC (Research & Enterprise)'s representative as appropriate on such occasions that there may be actual or potential conflicts of interest or in providing advice on the application of the Code.

## **2.6 Heads of School**

2.6.1 Heads of Schools of Study have a responsibility to ensure that the highest standards of research integrity, governance and ethical practice are met and that research activities are undertaken in compliance with the Code by staff and students under their responsibility whilst seeking to foster a culture of openness and professional integrity in research practice. Schools will draw attention to the Code in its induction processes for newly appointed teaching and research faculty. Heads of School should actively ensure that Early Career Researchers receive adequate management, guidance, and training to ensure understanding of and compliance with the Code.

## **2.7 Directors of Research & Knowledge Exchange**

2.7.1 Directors of Research & Knowledge Exchange have a responsibility to support Heads of School and the Pro VC (Research) in ensuring that the highest standards of research integrity, governance and ethical practice are met and that research activities are undertaken in compliance with the Code by staff and students in their Schools. Directors of Research & Knowledge Exchange should actively ensure that Early Career Researchers receive adequate management, guidance, and training to ensure understanding of and compliance with the Code. Dedicated mentoring should be offered on any particular area where the researcher requires support.

## **2.8 Principal Investigators**

2.8.1 Principal Investigators and others with a designated research leadership or management role, 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 by staff and students under their supervision, and to seek to foster a culture of openness and professional integrity in research practice. Principal Investigators are responsible for creating and maintaining a safe, open and collaborative working environment which should include being clear about processes in place which allow people to raise issues of concern, notably in relation to bullying and harassment. Principal Investigators should actively ensure that Early Career Researchers receive adequate management, guidance, and training to ensure understanding of and compliance with the Code. Dedicated mentoring should be offered on any particular area where the researcher requires support.

## **2.9 Supervisors of students engaged in research**

2.9.1 Supervisors of students engaged in research 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 of Practice for Research by staff and students under their supervision, and to seek to foster a culture of openness and professional integrity in research practice. Supervisors of students have a responsibility in ensuring that they provide guidance on the ethical principles that underpin research and that they provide appropriate support to their

supervisees in submitting applications for ethics review of a standard necessary to commence research. Supervisors shall ensure that their students receive on-going support (including training) to conduct research in compliance with the Code and will direct students to any additional training or support that may be required.

## 3 Code of Practice for Research

### 3.1 Breach of the Code

3.1.1 It is a condition of conducting research under the auspices of the University that practice conforms to this Code. Failure by a researcher to comply with the provisions of the Code will be grounds for action to be taken under the University's *Procedure for the Investigation of Allegations of Misconduct in Research* ("the Procedure"). Alleged misconduct in research relating to doctoral level research or to a thesis that has been submitted for examination will normally also be investigated under the Procedure.

3.1.2 Allegations of breaches of the Code in taught postgraduate and undergraduate programmes will be considered and investigated under the University's [Regulations for examinations and assessment](#).<sup>10</sup>

### 3.2 Seeking advice about the Code

3.2.1 Where a researcher is in doubt about the applicability of the provisions of the Code, or about the appropriate course of action to be adopted in relation to it, advice should be sought from the Pro-VC (Research & Enterprise), or from the Director of Research and Enterprise as the Pro-VC (Research & Enterprise)'s representative.

3.2.2 All students should in the first instance, seek advice from their designated academic supervisor.

### 3.3 Specific requirements of Research Integrity

3.3.1 Research Integrity includes the following:

- i. Fundamentals of research work such as: upholding rigour aligned to accepted disciplinary norms and standards, maintaining professional standards; documenting methods and outcomes; questioning one's own findings; attributing and acknowledging honestly the contribution of others;
- ii. Leadership and co-operation in research groups;
- iii. Undertaking research with the highest standards of ethical practice and research integrity;
- iv. Taking special account of the needs of early career researchers;
- v. Sourcing, using, managing, storing and archiving data for research effectively and in compliance with relevant standards and policies;
- vi. Sharing research outputs and data effectively and in line with the University's policies on Research Data Management and Open Access;
- vii. Undertaking research in line with University policies, legal and regulatory requirements, and the relevant professional codes of practice.

3.3.2 This Code must be implemented alongside all other relevant policies and standards published

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<sup>10</sup> <https://www.sussex.ac.uk/adge/standards/examsandassessment> - Section 2, Academic Misconduct

by the University<sup>11</sup>. The University policies applicable to research may be accessed through the Research and Knowledge Exchange webpages<sup>12</sup>, and the University may publish or revise its policies from time to time. Advice on the application of relevant policies may be sought from the Director of Research and Enterprise or their staff.

#### **1.4 Professional Standards**

1.4.1 It is important that a culture of honesty and integrity in research is fostered and maintained in the University. At the heart of all research, regardless of discipline, is the need for researchers to be honest in respect of their own actions and in their responses to the actions of other researchers. This applies to the whole range of research work, including methodological and experimental design, conduct, generating and analysing data, publishing results, and acknowledging appropriately the direct and indirect contributions of colleagues, collaborators and others.

#### **3.5.1 Research with human participants**

3.5.2 In accordance with the University Ethics Review process, approval from an appropriate research ethics committee or delegated officer (for taught student programmes) must be sought for research which involves human participants, their tissue or data before the start of work. No approval may be granted retrospectively for data collection that has taken place in the absence of ethics review.

3.5.3 In research where human beings are the subject of physical tests or physical intervention, the Principal Investigator must submit protocols on ethical, health and safety procedures for approval by the relevant Research Ethics committee. Research meeting specific criteria may also be subject to the approval of an appropriate national or international body after securing University Sponsorship<sup>13</sup>. To check what approval(s) a study requires when working with the NHS and/ or clinical settings, please consult the Health Research Authority<sup>14</sup>.

3.5.4 Research using healthy volunteers as participants that requires medically qualified supervision to ensure the safety of participants, will be subject to the review and scrutiny prescribed in the University's *Research Governance Standard Operating Procedures*.

#### **3.6 Research with animals**

3.6.1 All research involving animals should have approval through the Animal Welfare and Ethical Review Body (AWERB) regardless of status in relation to the Animals (Scientific Procedures) Act 1986 or the location of the research activity. Research undertaken by collaborative partners or on a contractual basis for the University will not be exempt from these requirements.

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<sup>11</sup> Notably the [Procedure for the Investigation of Allegations of Misconduct in Research](#) and the [Research Governance Standard Operating Procedures](#).

<sup>12</sup> [http://www.sussex.ac.uk/staff/research/rqi/rqi\\_information\\_and\\_support/rqi\\_strategy\\_policy](http://www.sussex.ac.uk/staff/research/rqi/rqi_information_and_support/rqi_strategy_policy)  
<http://www.sussex.ac.uk/staff/research/governance>

<sup>13</sup> If unsure of approvals required, researchers should consult the Health Research Authority or a member of the University Research Ethics, Integrity and Governance Team. <http://www.hra.nhs.uk/research-community/before-you-apply/>

<sup>14</sup> <https://www.hra.nhs.uk/>

3.6.2 Researchers should consider at an early stage in the design of any research involving animals, the opportunities for Replacement, Reduction and Refinement of any animal involvement (the 3Rs principle)<sup>15</sup>.

### **3.7 Internal and external legal, regulatory and ethical frameworks**

3.7.1 Any special standards of work performance and ethical conduct imposed by law or by the University in relation to particular categories of research are deemed to be included in this Code in its application to staff and students engaged in that research in or for the University. This includes the University's *Ethics Review*<sup>16</sup> and *Sponsorship Request* processes.

3.7.2 In addition to receiving approvals to commence research through internal processes, researchers are required to follow any local regulations, Codes of Practice and Standard Operating Procedures pertaining to their work.

3.7.3 Researchers must take responsibility for ensuring their on-going awareness of and compliance with relevant external legislation together with the ethical frameworks and standards of research set by the funders, scientific and professional bodies, and other relevant stakeholders.

### **3.8. Good Clinical Practice (GCP)**

3.8.1.1 Research Integrity in clinical research involving human participants further involves compliance with Good Clinical Practice.

3.8.1.2 Good Clinical Practice (GCP) is an international ethical and scientific quality standard for the design and conduct of clinical research involving humans<sup>17</sup>. GCP is a set of core principles, which applies to all clinical investigations that could affect the safety and well-being of human participants. GCP is internationally recognised as best practice and compliance (including up to date training) and is a legal obligation in the UK/Europe for all trials of investigational medicinal products. GCP was developed by the regulatory authorities represented in the Tripartite International Conference on Harmonisation and provides international assurance that:

- i. Data and reported results of clinical investigations are credible and accurate, and;
- ii. The rights, safety and confidentiality of participants in clinical research are respected and protected.

### **3.9 Access to Genetic Resources: the Nagoya Protocol on Access to Genetic Resources and the Fair and Equitable Sharing of Benefits Arising from their Utilization**

3.9.1 The Protocol applies to any genetic material (plant, animal, microbial, other), and the local or traditional knowledge relating to the genetic material. It does not include human genetic resources or genetic resources already governed by specialised international instruments

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<sup>15</sup> <https://www.nc3rs.org.uk/>

<sup>16</sup> <http://www.sussex.ac.uk/staff/research/governance/apply>

<sup>17</sup> <https://www.ich.org/page/efficacy-guidelines#6-2>

(e.g. the International Treaty on Plant Genetic Resources for Food and Agriculture)<sup>18</sup>.

3.9.2 It is the responsibility of the researcher to understand whether the Nagoya Protocol applies to their research before any material is brought to the University and to maintain relevant records throughout the research lifecycle.

3.9.3 A checklist is available to researchers to assist with the classification of material and as evidence for the University, regulators and funders in the event of audit or query<sup>19</sup>.

### **3.10 Research with relevant material under the Human Tissue Act**

3.10.1 The Human Tissue Act 2004 (HT Act) governs the storage and use of relevant material from the living and the removal, storage and use of relevant material from the deceased, for a scheduled purpose.

3.10.2 The university requires researchers to take all appropriate steps to ascertain whether any human tissue samples they plan to obtain, use or store need to be held under a Human Tissue Authority licence and in accordance with relevant Standard Operating Procedures and the standards of the Human Tissue Authority.

3.10.3 Planned activity involving the University's Human Tissue Authority licences must be notified in advance to the relevant Person Designate or Designated Individual<sup>20</sup>.

### **3.11 Leadership of research**

3.11.1 Principal Investigators and group leaders must ensure that the appropriate direction of research and the supervision of researchers (including training) is provided.

3.11.2 The creation of an environment where everyone is treated fairly and with respect is essential to facilitating good research. Within a research group (where one exists), responsibility for creating such a climate lies with the group leader. Group leaders are responsible for creating and maintaining a safe, open and collaborative working environment which should include having clear about processes in place which permit raising issues of concern, notably in relation to bullying and harassment<sup>21</sup>.

### **3.12 Leadership of Early Career Researchers**

3.12.1 Heads of School, Directors of Research and Knowledge Exchange, Principal Investigators, and any individual with line management or supervision responsibilities for researchers, should actively ensure that Early Career Researchers receive adequate management, guidance, and training to ensure compliance with the Code and following the principles of the Concordat to Support the Career Development of Researchers<sup>22</sup>. Dedicated mentoring should be offered on any particular area where the researcher requires support. Early career researchers should be signposted to relevant training and development opportunities.

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<sup>18</sup>18 The Access and Benefit-sharing Clearing-House (ABSCH) is a platform for exchanging information on access and benefit-sharing and is a key tool to facilitate the implementation of the Nagoya Protocol - <https://absch.cbd.int/en/>

<sup>19</sup> [http://www.sussex.ac.uk/staff/research/governance/erp\\_overview/nagoyaprotocol](http://www.sussex.ac.uk/staff/research/governance/erp_overview/nagoyaprotocol)

<sup>20</sup> [http://www.sussex.ac.uk/staff/research/governance/erp\\_overview/humantissue](http://www.sussex.ac.uk/staff/research/governance/erp_overview/humantissue)

<sup>21</sup> <https://www.sussex.ac.uk/staff/dignity-and-respect/index>

<sup>22</sup> <https://www.vitae.ac.uk/policy/concordat>

### 3.13 Personal and Research Data Management

3.13.1 The University processes personal data for research purposes in “*the public interest or in the exercise of official authority vested in the controller*” also known as ‘public task’. In exercising this public task appropriate safeguards must be in place to protect the rights and freedoms of individuals and any processing must be in keeping with recognised ethical standards for research. These include institutional ethics review processes. Particular care needs to be taken when processing special category data<sup>23</sup>.

3.13.2 All researchers should read and implement the University’s *Research Data Management Policy* as applicable to their own use of research data<sup>24</sup>. In addition to the specific requirements of the latter policy, researchers should ensure that the following principles and standards are fully integrated into their normal practice as researchers, and applied to research undertaken, irrespective of whether it is externally funded or not:

- i. Research data must be managed to appropriate standards throughout the research lifecycle;
- ii. Research data must be made available to other researchers and to the public in an appropriate and accessible form and in a timely way wherever such publication is practical, legal, ethical, and commercially viable;
- iii. All substantive research proposals that include the collection and/or analysis of data must include research data management plans;
- iv. Secure and appropriate safeguards relating to digital and physical storage should be used for all data, and data should be accessed only in appropriate locations where it is not vulnerable to loss or illegitimate access. Researchers working off-site should undertake risk assessments and plan accordingly. Particular requirements apply to the data relating to human participants and to commercially sensitive data, as set out in the *Research Data Management Policy*; Researchers are responsible for reporting actual or suspected data breaches of personal data security<sup>25</sup> to the University’s Data Protection Officer<sup>26</sup> at the earliest possible opportunity who will then assess whether the Information Commissioner’s Office will need to be notified;
- v. For data collection involving human participants, explicit participant consent must always be secured at the outset, and the data must only be used in accordance within the letter and spirit of that consent unless there is the explicit approval of an ethics committee to do otherwise;

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<sup>23</sup> <https://www.sussex.ac.uk/ogs/policies/information/dpa/research-and-gdpr>

<sup>24</sup> <https://www.sussex.ac.uk/library/researchdatamanagement/policies>

<sup>25</sup> The Information Commissioner’s Office defines a data breach as personal data breach as “a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data. This includes breaches that are the result of both accidental and deliberate causes. It also means that a breach is more than just about losing personal data. <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/personal-data-breaches/#:~:text=A%20personal%20data%20breach%20means,both%20accidental%20and%20deliberate%20causes>

<sup>26</sup> <https://www.sussex.ac.uk/ogs/policies/information/dpa/reportingdatabreaches>

- vi. Non-anonymised personal data must be held, and ultimately destroyed, in compliance with the Data Protection Act the University's data protection policies. Accordingly, the extent of non-anonymised personal data stored must be adequate, relevant, and not excessive;
- vii. Research data should be available for access by other researchers and to the public in appropriate forms, except where confidentiality provisions prevail, in accordance with the University's position and policies on Open Access. In general, academic enquiry and debate require openness, but confidentiality provisions relating to publication may apply in circumstances where the University or the researcher has made or given confidentiality undertakings to third parties or confidentiality is required to protect intellectual property rights, or where confidentiality is a funder requirement.
- viii. Researchers do not have the authority to sign data sharing agreements or enter into legally binding arrangements or reassurances for the management of data on behalf of the University. The Research Governance Officer in Research and Enterprise Services shall be approached in the first instance to advise on the most appropriate course of action.

### **3.14 Publication of results and other research outputs**

3.14.1 The following provisions apply to publications and other research outputs:

- i. All publications and research outputs must report research and research findings accurately and with integrity;
- ii. A publication which is substantially similar to another publication derived from the same research must contain appropriate reference to the other publication;
- iii. A researcher who submits substantially similar work to more than one publisher should disclose that fact to the publisher at the time of submission;
- iv. All publications and research outputs must be made available to other researchers and to the public in accordance with the University's policies on Open Access, and researchers are encouraged to meet standards for Open Access required by funders or by government bodies wherever practically possible;
- v. Every publication or other research output produced by a researcher at the University of Sussex will have a record created in the University's Research Information System<sup>27</sup>, except in very rare cases where creation of such a record would pose a security risk or is prohibited for other legitimate reasons connected to the nature of the research. Wherever possible, the Research Information System output record will also include deposit of a manuscript or equivalent materials.

### **3.15 Authorship**

3.15.1 The following provisions apply to authorship:

- i. A publication (and as far as practically possible, any other kind of research output) must contain reference to the contributions of all participants who have made a significant contribution to the relevant research. Referencing and related aspects of research outputs should be compliant with the guidelines of the Committee on Publication Ethics (COPE)<sup>28</sup>;

<sup>27</sup> <https://www.sussex.ac.uk/library/research-outputs/elements>

<sup>28</sup> <https://publicationethics.org/>

- ii. Any person who has participated in a substantial way in conceiving, executing or interpreting at least part of the relevant research should be given the opportunity to be included as an author of an output derived from that research;
- iii. Any person who has not participated in a substantial way in conceiving, executing or interpreting at least part of the relevant research should not be included as an author of an output derived from that research, but may be appropriately acknowledged;
- iv. In addition to meeting the requirements detailed above, an author must ensure that the work of research students, research staff and support staff is recognised in a publication derived from research to which they have made a significant contribution;

### 3.16 Conflicts of Interest and Financial Involvement

#### 3.16.1 The following provisions apply to conflicts of interest:

- ii. A researcher must act at all times with integrity and the highest standards of propriety, in the best interests of the University and make full disclosure of any personal potential or actual conflict of interest in research<sup>29</sup>.
- iii. **Conflict of interest** includes, but is not restricted to, personal or close family affiliation to, or financial involvement with, any organisation sponsoring or providing financial support for a project undertaken by a researcher.
- iv. **Financial involvement** includes direct personal financial interest, receipt of personal benefits (such as travel and accommodation) and receipt of material or facilities for personal use. (For the avoidance of doubt, the provision of sponsored studentships or elements of travel/accommodation for students or researchers in connection with the research should be excluded from this definition.) Researchers should act in full accordance with the normal principles of financial accountability
- v. Where it is unavoidable that a purchase is made from a company in which a researcher has a direct financial interest, i.e. he/she or a member of their family stands to gain financially, the researcher is required to disclose this interest. This would include, but is not restricted to, cases where the researcher or a member of their family is an employee, director or partner, has a shareholding of greater than 25% or acts as a consultant to the company. The researcher will be barred from authorising the purchase and should seek advice from Research & Enterprise Services regarding how to proceed.
- vi. A researcher must comply with a direction made by the Head of School in relation to a personal conflict of interest in research. The Head of School may seek advice from the Pro-VC (Research) in cases of doubt. . If any conflict of interest arises that relates to the Head of School, the disclosure should be made to the Chief Operating Officer or to the Director of Research and Enterprise as his/her representative.
- vii. Members of staff must not participate in committees or other groups acting on behalf of the University or its associated companies where there is a clear possibility that a conflict of interest will regularly arise.

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<sup>29</sup> See also the University's Staff Code of Conduct and Declaration and Register of Interests

### **3.17 Register of Interests**

3.17.1 Members of staff have a responsibility to declare, through the *Register of Interests* the following areas of activity (on at least an annual basis):

- i. all directorships registered under the Companies Act, whether or not they are remunerated;
- ii. employment, office or profession or other activity apart from employment by the University of Sussex;
- iii. other interests, for example: clients or business relationships which they know to have a direct connection with the University and its associated companies or which might affect their business ; any significant shareholdings in organisations which they know to have business with the University or its associated companies; unremunerated posts, honorary positions and other connections which may give rise to a conflict of interest or of trust.

### **3.18 Purchasing and Expenditure for Research**

3.18.1 Purchasing and expenditure of funds should take place in accordance with the terms and conditions of any grant or contract held for the research, the University's *Finance Regulations*, and the University's *Purchasing Policy*.

3.18.2 Financial reimbursement or incentives for research participants must be considered appropriate and proportionate to the proposed research activity. Volunteers to participate in research may be compensated financially for reasonable travel expenses, inconvenience and for time given to contribute to the research. Payments made to individuals must not be so large as to induce individuals to risk harm beyond that which they would usually accept.

### **3.19 Submitting applications for funding**

3.19.1 Principal Investigators should take all reasonable measures to ensure the accuracy of information contained in applications for funding.

3.19.2 Principal Investigators shall ensure that they understand the terms of research funding and be aware of their responsibilities for reporting and other conditions before submitting the application for funding.

3.19.3 A researcher who submits substantially similar work to more than one funder should disclose that fact to the funder at the time of submission;

## **4 Misconduct and allegations or complaints of misconduct**

4.1 Misconduct in research is defined as any breach of the University's *Code of Practice for Research*, or other practices that seriously deviate from those that are commonly accepted within the academic and research communities for proposing, conducting or reporting research. It specifically encompasses, but is not restricted to:

- i. Fabrication, including the creation of false data or other aspects of research, including documentation and participant consent.
- ii. Falsification, including the inappropriate manipulation and/or selection of data, imagery and/or consents.
- iii. Misrepresentation of data and/or interests and or involvement.

(iv) Plagiarism, including the general misappropriation or use of others' ideas, intellectual property or work (written or otherwise), without acknowledgement or permission.

(v) Failures to follow accepted procedures or to exercise due care in carrying out responsibilities for avoiding unreasonable risk or harm to:

- humans;
- animals used in research; and
- the environment

(vi) Failures to follow accepted procedures or to exercise due care in carrying out responsibilities for the proper handling of privileged or private information on individuals collected during the research.

(vii) Any breach of data protection legislation and failure in the proper handling of privileged or private information on individuals collected during the research.

(viii) Intentional damage to, or removal of, the research-related property of another.

(ix) Intentional non-compliance with: the terms and conditions governing the award of external funding for research; the University's policies and procedures relating to research, including accounting requirements, ethics, and health and safety regulations; or any other legal or ethical requirements for the conduct of research.

4.2 Misconduct in research does not include unintentional error or professional differences in interpretation or judgment of data.

4.3 For the avoidance of doubt, misconduct in research includes acts of omission as well as acts of commission.

4.4 Staff and students have a duty to report misconduct in the prosecution of research, where they have good reason to believe it is occurring, to the 'Named Person' for Research Integrity<sup>30</sup>. The University will investigate allegations or complaints about misconduct in research or about scientific or scholarly fraud.

4.5 Failure by a researcher to comply with the provisions of this Code will be grounds for action to be taken under the University's *Procedure for the Investigation of Allegations of Misconduct in Research* (the Procedure). In particular, any allegation or complaint of misconduct will be investigated and dealt with under the Procedure and may be subject to action under the University's disciplinary procedures. Alleged misconduct in research relating to doctoral student research or to a thesis which has been submitted for examination will normally be investigated under the Procedure.

4.6 Any complainant who can be shown to have acted maliciously may also be subject to action under the University's disciplinary procedures.

4.7 'Researchers who wish to submit their work to a formal process of internal scrutiny (in the event of retraction of published work or similar) are required to initiate the *Procedure for the Investigation of Allegations of Misconduct in Research*.'

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<sup>30</sup> <https://www.sussex.ac.uk/research/about/standards>

## 5. University policies, legislation and standards of good practice

### University policies

Annual University Research Integrity Policy Statement

<https://www.sussex.ac.uk/research/about/standards/research-integrity-policy-statement>

Anti-Bribery Policy –

<http://www.sussex.ac.uk/ogs/policies/goodconduct/fraudbriberyandcorruption>

Anti-Money Laundering Policy –

<https://www.sussex.ac.uk/webteam/gateway/file.php?name=anti-money-laundering-policy-final-approved-july-2017-.pdf&site=76>

Code of Conduct and Declaration and Register of Interests -

<http://www.sussex.ac.uk/ogs/policies/goodconduct/conflictinterest>

Counter Fraud Policy

<https://www.sussex.ac.uk/webteam/gateway/file.php?name=counter-fraud-policy-final-approved-july-2017.pdf&site=76>

Dignity and Respect Policy

[https://www.sussex.ac.uk/webteam/gateway/file.php?name=dignity-and-respect-policy-\(links\).pdf&site=608](https://www.sussex.ac.uk/webteam/gateway/file.php?name=dignity-and-respect-policy-(links).pdf&site=608)

Donations Policy

<https://www.sussex.ac.uk/webteam/gateway/file.php?name=donations-policy-updated-november-2020.pdf&site=76>

Equality and Diversity Policy –

<https://www.sussex.ac.uk/webteam/gateway/file.php?name=university-of-sussex-equality-and-diversity-policy.pdf&site=369>

Financial Regulations –

<http://www.sussex.ac.uk/finance/policies>

Fraud, bribery and corruption -

<http://www.sussex.ac.uk/ogs/policies/goodconduct/fraudbriberyandcorruption>

Hospitality and Gifts Register -

<https://www.sussex.ac.uk/ogs/policies/goodconduct/hospitality>

Policy to Prevent Harassment and Bullying at Work -

<http://www.sussex.ac.uk/humanresources/personnel/policies>

Public Interest Disclosure Policy ('Raising concerns')

<https://www.sussex.ac.uk/ogs/policies/goodconduct/raisingconcerns>

Procedure for the Investigation of Allegations of Misconduct in Research -  
[http://www.sussex.ac.uk/staff/research/rqi/rqi\\_information\\_and\\_support/rqi\\_strategy\\_policy/research-policies](http://www.sussex.ac.uk/staff/research/rqi/rqi_information_and_support/rqi_strategy_policy/research-policies)

Purchasing Policy –

<http://www.sussex.ac.uk/finance/how/purchasing>

Report and Support Tool

<https://reportandsupport.sussex.ac.uk/>

Research Data Management Policy –

<http://www.sussex.ac.uk/library/researchdatamanagement/policies>

Seven Principles of Public Life (Nolan Principles) -

<https://www.gov.uk/government/publications/the-7-principles-of-public-life/the-7-principles-of-public-life--2>

Staff Code of Conduct and Declaration and Register of Interests

[https://www.sussex.ac.uk/webteam/gateway/file.php?name=staff-code-2015-16-\(002\).pdf&site=76](https://www.sussex.ac.uk/webteam/gateway/file.php?name=staff-code-2015-16-(002).pdf&site=76)

Policy on Definitions of Violence

<https://www.sussex.ac.uk/webteam/gateway/file.php?name=definitions-of-violence.pdf&site=302>

Public Interest Disclosure Policy –

<http://www.sussex.ac.uk/ogs/policies/goodconduct/raisingconcerns>

University regulations (regulations 1 – 37)

<http://www.sussex.ac.uk/ogs/govdocuments/regulations>

## **Relevant Legislation**

Animals (Scientific Procedures) Act 1986 (ASPA) -

<https://www.legislation.gov.uk/ukpga/1986/14/contents>

Data Protection Act 2018

<http://www.legislation.gov.uk/ukpga/2018/12/contents/enacted>

Human Tissue Act 2004

<https://www.legislation.gov.uk/ukpga/2004/30/contents>

## **Policies and standards of research integrity**

Concordat to Support Research Integrity -

<https://www.universitiesuk.ac.uk/topics/research-and-innovation/concordat-research-integrity>

Committee on Publication Ethics -

<https://publicationethics.org/>

Human Tissue Authority -

<https://www.hta.gov.uk/>

International Council for Harmonisation of Technical Requirements for Pharmaceuticals for Human Use (ICH) (including GCP)

<https://www.ich.org/products/guidelines/efficacy/efficacy-single/article/integrated-addendum-good-clinical-practice.html>

The Nagoya Protocol on Access and Benefit-sharing

<https://www.cbd.int/abs/>

UK Policy Framework for Health and Social Care Research

<https://www.hra.nhs.uk/planning-and-improving-research/policies-standards-legislation/uk-policy-framework-health-social-care-research/>

UK Research and Innovation –

<https://www.ukri.org/our-work/supporting-healthy-research-and-innovation-culture/research-integrity/>

UK Research Integrity Office -

<https://ukrio.org/>

## 4 Document history

Version	Date	Change
1.0	March 2000	Original document.
1.1	July 2011	<p>Paragraphs 1.3, 2.2 and 4.1 – 4.6 revised to reflect the introduction of the <i>Procedure for the Investigation of Allegations of Misconduct in Research</i>.</p> <p>The Procedure replaces the <i>Code of Practice for Dealing with Allegations of Misconduct by Staff in Research</i> and <i>The Procedures for Dealing with Allegations or Complaints of Misconduct by Students Engaged in Research</i>.</p> <p>Minor revision to paragraph 3.2 to reflect change in NHS terminology.</p>
1.2	October 2014	Revisions throughout the document to reflect new structures within the University and to recognise recent policy developments, particularly on the management of research data.
1.3	December 2017	Minor revisions throughout the document to reflect recent developments.
1.4	May 2018	Revisions to reflect the General Data Protection Regulation and changes in roles of University officers.
1.5	May 2019	Changes throughout to presentation of the Code to fit the standard University policy template. Addition of responsibilities section, cross-referencing to other internal and external institutional policies and processes, clarifications for ease of reference.
1.6	May 2022	Recognition of alignment of taught student regulations to include 'breach of research ethics', updates to research governance committees and relevant legislation and regulatory frameworks

Policy title:	Code of Practice for Research
Date approved:	
Approving body:	Council
Last review date:	
Revision history:	
Next review date:	
Related internal policies, procedures, guidance:	<a href="http://www.sussex.ac.uk/staff/research/rqi/rqi_information_and_support/rqi_strategy_policy/research-policies">http://www.sussex.ac.uk/staff/research/rqi/rqi_information_and_support/rqi_strategy_policy/research-policies</a>
Policy owner:	<i>Research and Enterprise</i>
Lead contact / author:	<i>Research Governance Officer</i>

*Approved by Council xxxxx*  
**Version 3.0 June 2022**