

THE UNIVERSITY OF SUSSEX
CODE OF PRACTICE FOR RESEARCH

1. PRINCIPLES

1.1 Statement of Principles

1.1.1 This Code of Practice (“the Code”) sets out standards of 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.

In order 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;
- (iv) ensure the safety of those associated with or involved in the research (this includes the researchers themselves);
- (v) observe all legal, regulatory and ethical requirements laid down by the University or other statutory bodies.

1.1.2 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.

1.2 Observance of the Code

1.2.1 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, 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. 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.

1.3 Breach of the Code

1.3.1 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 student research or to a thesis that has been submitted for examination will normally also be investigated under the Procedure.

1.4 **Advice**

- 1.4.1 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), or from the Director of Research and Enterprise as Pro-VC (Research)'s representative.

2 **SPECIFIC REQUIREMENTS**

2.1 Good research practice includes the following:

- (i) Fundamentals of research work such as: 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 Open Access;
- (vii) Undertaking research in line with University policies, legal and regulatory requirements, and the relevant professional code of practice.

2.2 Good research practice in clinical research involving human participants further involves compliance with Good Clinical Practice.

2.2.1 Good Clinical Practice (GCP) is an international ethical and scientific quality standard for the design and conduct of clinical research involving humans. 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.

The University expects that all clinical research involving human participants is undertaken in line with the principles of GCP.

2.3 This Code should be implemented alongside all other relevant policies published by the University. The University policies applicable to research may be accessed through the Research and Knowledge Exchange webpages, 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 his/her staff.

2.4 **Purchasing and Expenditure for Research**

2.4.1 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 *Procurement Policy*.

2.4.2 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.

2.5 **Professional Standards**

2.5.1 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.

2.6 **Leadership**

2.6.1 The creation of a sound research climate is essential to good research practice. Within a research group (where one exists), responsibility for creating such a climate lies with the group leader. Group leaders and other senior researchers should create a research environment of mutual co-operation, in which all researchers are encouraged to develop their skills and in which the open exchange of research ideas is fostered. They must also ensure that appropriate direction of research and supervision of researchers are provided.

2.7 **Early Career Researchers**

2.7.1 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. Dedicated mentoring should be offered on any particular area where the researcher requires support. Early career researchers should be signposted to training and development opportunities.

2.8 **Data**

2.8.1 The University processes personal data for research purposes in relation to its public tasks and legitimate interests. These legal bases for processing are regularly reviewed and balanced against individual rights and freedoms. Consent is relied on, as a legal basis for processing from participants of research. The form of consent that is needed from them, will depend on the type of personal data gathered and the context in which it is taking place.

2.8.2 All researchers should read and implement the University's *Research Data Management Policy* as applicable to their own use of research data. 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 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 data security¹ to the University's Data Protection Officer at the earliest possible opportunity who will then assess whether the Information Commissioner's Office will needs 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;
- (vi) Non-anonymised personal data must be held, and ultimately destroyed, in compliance with data protection legislation and 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.

2.9 Publications and Other Research Outputs

¹ The Information Commissioner's Office defines a data breach as 'a security incident that has affected the confidentiality, integrity or availability of personal data. In short, there will be a personal data breach whenever any personal data is lost, destroyed, corrupted or disclosed; if someone accesses the data or passes it on without proper authorisation; or if the data is made unavailable, for example, when it has been encrypted by ransomware, or accidentally lost or destroyed (<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/personal-data-breaches/>)

2.9.1 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 (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);
- (iii) 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;
- (iv) 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;
- (v) 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;
- (vi) A publication which is substantially similar to another publication derived from the same research must contain appropriate reference to the other publication;
- (vii) A researcher who submits substantially similar work to more than one publisher should disclose that fact to the publisher at the time of submission;
- (viii) 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;
- (ix) Every publication or other research output produced by a researcher at the University of Sussex will have a record created in Sussex Research Online (SRO), 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 SRO output record will also include deposit of a manuscript or equivalent materials.

2.10 **Conflicts of Interest**

2.10.1 The following provisions apply to conflicts of interest:

- (i) A researcher must make full disclosure of any personal potential or actual conflict of interest in research. 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. 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.) 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.

- (ii) Disclosure of a personal conflict of interest in research must be made to the Head of School as soon as reasonably practicable. If any conflict of interest arises that relates to the Head of School, the disclosure should be made to the Pro-VC (Research) or to the Director of Research and Enterprise as his/her representative.
- (iii) 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.

2.11 Submitting Proposals

- 2.11.1 Principal Investigators should take all reasonable measures to ensure the accuracy of information contained in applications for funding.
- 2.11.2 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.
- 2.11.3 A researcher who submits substantially similar work to more than one funder should disclose that fact to the funder at the time of submission;

3 ADDITIONAL REQUIREMENTS

- 3.1 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 *Ethical Review and Sponsorship Request Process*.
- 3.2 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 is also subject to the approval of an appropriate national body². To check what approval(s) a study requires, please consult the Health Research Authority.
- 3.3 The University requires that all research involving non-human animals undergoes ethical review regardless of status in relation to the Animals (Scientific Procedures) Act.

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.

² If you are unsure what approval you require please consult the Health Research Authority or the University Research Governance Officer <http://www.hra.nhs.uk/research-community/before-you-apply/>

- (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.
 - (iv) 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.
 - (x) 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.
 - (xi) Any breach of data protection legislation and failure in the proper handling of privileged or private information on individuals collected during the research.
 - (xii) Intentional damage to, or removal of, the research-related property of another.
 - (xiii) 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 Deputy Vice-Chancellor. 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 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*.'

Approved by Council 27 June 2018

Version 1.4. May 2018

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. |