

ANNUAL RESEARCH INTEGRITY POLICY STATEMENT 2021-22

PREAMBLE

This statement provides the University's response to the UK *Concordat for Research Integrity* ('The Concordat') and is intended to inform UK Research and Innovation, Research England, the academic community, other funders of our research, and the public more broadly, 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 the following principles:

- 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

A message from Professor Sasha Roseneil

The University of Sussex is committed, through the Research with Impact strand of the 2025 Strategic Framework, to all research meeting 'the highest standards of rigour, integrity, ethics and governance'. The University recognises that public trust in our work is paramount to our mission and reputation as an ambitious organisation committed to conducting world-leading research that makes a difference to people's lives.

The annual Research Integrity statement evidences our full commitment to the Concordat for Research Integrity and sets out the institutional actions we are taking to embed its principles.

*Professor Sasha Roseneil, Vice-Chancellor
University of Sussex*

Overview of activities 2021-2022

The following activities and initiatives supported the University's commitment to research integrity in 2021-22:

- Updates to the *Procedure for the Investigation of Allegations of Misconduct in Research* and the *Code of Practice for Research*
- The introduction of a specific Compliance Panel for legal and compliance issues relating to research into mass data sets and social media platforms
- The development of guidance for researchers undertaking social media research
- The delivery of a varied programme of research training and briefings for researchers and ethics committee members
- The setting up of a Research Culture Steering Group to oversee initiatives and strategies relating to collegiality and collaboration, career development, EDI, research recognition, open research and research integrity
- Financial support for research culture initiatives and projects from the university's Research England enhancing research culture funding
- An audit of the university's oversight of research governance arrangements for human ethics review by KPMG

Specific actions and initiatives evidencing commitment to the Concordat to Support Research Integrity

Commitment 1: *Maintaining the highest standards of rigour and integrity in all aspects of research*

The University has established and continues to articulate its key standards for research integrity in three main documents:

1. [The Code of Practice for Research](#)¹
2. [The Research Governance Standard Operating Procedure](#)²
3. [The Procedure for the Investigation of Allegations of Misconduct in Research \('the Procedure'\)](#)³

Initiatives and actions in the 2021-22 academic year

The university undertook a review and update of *The Procedure for the Investigation of Allegations of Misconduct in Research* and the *Code of Conduct for Research* following formal approval.

In parallel, working with the University Education Committee, updates to the Examination and Assessment Regulations for taught students have led to the inclusion of “Breach of research ethics” as an explicit category of academic misconduct therefore bringing consistency with the *Code of Conduct for Research* and clarity on the means to sanction transgression of institutional research standards in student work.

Throughout the academic year, the Research Ethics Integrity and Governance (REIG) team has supported schools of study and Cross School Research Ethics Committees (C-RECs) in the practical application of these changes when issues relating to non-compliance with ethics processes occur.

In September 2021, the University commissioned a senior external consultant to undertake a review of attitudes and processes relating to institutional ethics processes, primarily in the school of Law, Politics and Sociology. A report was subsequently issued and after discussion by the Research Ethics and Integrity Committee, a six-month task and finish group will meet to issue a report to the University Education Committee on good practice in supporting taught students to engage in formal ethics review processes.

As part of its cycle of its assurance review of university processes, the institutional external auditor, KPMG undertook an audit of human ethics review processes and committee (C-REC) operations. The review took place in the spring of 2022 with a report to Council’s Audit and Risk Committee expected in the autumn.

Commitment 2: *Ensuring that research is conducted according to appropriate ethical, legal and professional frameworks, obligations and standards*

Initiatives and actions in the 2021-22 academic year

The **Research Governance Standard Operating Procedure** was reviewed in depth with significant restructuring of how it fits with the wider set of documents (SOPs in specialist areas of research,

¹ <https://www.sussex.ac.uk/webteam/gateway/file.php?name=code-of-practice-for-research-june-2018.pdf&site=377>

² <https://www.sussex.ac.uk/webteam/gateway/file.php?name=research-governance-standard-operating-procedures-june-2017.pdf&site=377>

³ <https://www.sussex.ac.uk/webteam/gateway/file.php?name=procedure-for-the-investigation-of-allegations-of-misconduct-in-research-june-2018.pdf&site=377>

policies, guidance notes etc.) that underpin institutional Research Integrity and the committees through which the University sets standards for research. Sections were amended to ensure the currency of guidance and the accuracy of references to key legislation and plans made for rolling updates on a periodic basis.

The Research Ethics, Integrity and Governance team delivered **specific training to members of C-RECs and School Research Ethics Officers (SREOs)**:

- 'Ethics Reviewers Workshop: Researching in the Online World'
- 'Researcher wellbeing when working with difficult materials and subject areas and/or in problematic locations and the role of research supervisors'

In the course of the 21-22 academic year, a working group comprise of experienced members of faculty and professional services developed a *Safeguarding in Research Policy* to ensure that safeguarding matters are effectively considered and provided for in overseas research and research involving children and vulnerable young adults that are not protected by existing safeguarding arrangements.

The policy has been drafted to ensure alignment with the institutional *Safeguarding Policy* and reflects a culture shift from research funders that extends the definition of safeguarding to include research safety and wellbeing as fundamental principles of creating and maintaining a safe and inclusive environment in which researchers work and collaborate.

Additional initiatives from the REIG team have included:

- Ethics guidance on research using human participant data from on-line sources/social media
- The establishment of a University Compliance Advisory Panel to review the legal and compliance issues specifically in the more complex social media mass data projects and provide specialist and timely advice to ethics committees on information security, data protection, insurance and legal implications to reduce potential institutional exposure to risk in a complex and rapidly evolving area. Compliance issues in other areas of research governance continue to be addressed through the Research Ethics, Integrity and Governance team's support and advice to ethics committees, members of Faculty, students and Professional Services colleagues, the ongoing work of groups and committees in specialised governance areas and through the provision of training.
- Detailed guidance on procedures for placement scheme years* Undergraduate Students (research ethics guidance to cover research activities that may take place on a placement scheme year, and to provide guidance for students returning to their studies following placement scheme years.)
- The implementation of a new proportionate review mechanism for BSMS staff and PGR student applicants submitting 'Low-Risk' proposals to the Medical School C-REC (BSMS RGEC)
- Creation and implementation of a Checklist and Guidance for Overseas Research for BSMS RGEC Applicants
- Adoption of University Hospitals Sussex NHS Foundation Trusts (UHSx) governance permissions Policy on service evaluation and audit projects undertaken by Medical School students.

Commitment 3: *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*

Initiatives and actions in the 2021-22 academic year

Members of the Research Ethics, Integrity and Governance team in Research and Enterprise Services have delivered and supported a variety of training sessions to support researchers across the University. Examples include:

- ‘Research ethics and the Ethics application process at Sussex’
- Research Ethics in Context
- Support for the ethics approval process in your school / Code of Practice for Research’
- MAPS Ethics Training and workshop (Institute for Development Studies)
- Researcher Development Programme: Open Q&A Follow-up to Introduction to Ethics
- Overview of Ethics - Ethics training scheduled as part of dissertation module for whole final year cohort - co-delivered with Psychology SREOs
- Ethical considerations to managing research data - co-delivered with the university of library
- Ethics presentation to Health & Social Care students at local sixth form college
- Ethics submission process and Q&A – Life Sciences
- ‘Research Ethics in Context’ – C-REC and SREO Ethics Reviewers Event with a keynote session by Dr Simon Kolstoe of the University of Portsmouth
- Research Ethics for the Independent Research Project (Medical School)
- ‘An Introduction to Applying for Ethical Approval at BSMS
- Researching in the Online World – C-REC and SREO Ethics

Training was designed and delivered both for specific schools of study or on a cross-university basis. Over 40 sessions were delivered by members of the Research Ethics, Integrity and Governance team in the 2021-22 academic year.

‘The Research Ethics, Integrity and Governance Team undertook a project to develop online training modules/ training kits in the field of research ethics and integrity with the support of institutional Research England Research Culture funding:

- An introduction to research ethics and University processes for ethics review
- Fundamentals of ethics review for ethics committee members and reviewers (C-RECs and SREOs)
- Fundamentals of good practice in research ethics - training for supervisors of student research
- An introduction to research integrity

These modules, that will reside on the institutional Virtual Learning Environment, Canvas, will make self-access training in research ethics available to all researchers at the university and ensure that ‘baseline’ awareness of standards and requirements is widely disseminated.

Members of the REIG team also attended training on ‘What Foreign Interference Looks Like’, ‘The Ethics of Co-production’, Export controls, and ‘Situational Awareness and Personal Security’. In September 2022, the team was represented at the Frontiers in Best Practice in Research Ethics Conference (Research England funded conference at University College London.)

Outside of the Research Ethics, Integrity and Governance team, the university has sought to take positive actions in 2021-22 to support the enhancement of the institutional research environment by funding initiatives across key areas. These have included open research, developing research

leadership skills across different career stages, improving access to and participation in research for people from currently underrepresented groups, diversifying reward and recognition approaches at various career stages and enabling of research impact.

Within the academic year, the University Library led initiatives to support and promote open research across the institution. These included:

- A doctoral open research prize to recognise and reward innovative open research practices
- Promotion of open research at Sussex using social media to 'show case' outputs and publications
- Training and advocacy for increased use of personal identifiers (such as ORCID)
- Making datasets and metadata openly available on the institutional research information system after receiving training
- An open research consultancy to understand obstacles to wider take up and proposals for an Open Research Strategy.

The Doctoral School (working with the Director of the Research Staff Working Group) took a lead in initiatives to support Early Careers Researchers (ECRs) , including:

- ECR Seed Funding to support exploratory projects by individuals and small groups to address Equality, Diversity and Inclusion (EDI) matters and to promote career enhancement and leadership initiatives.
- Targeted funding to underrepresented groups within the existing Junior Research Assistant programme (to provide experience in research to promising undergraduates)
- Research into needs for ECR/Postgraduate Researcher Supervisor training for (promoting equality, diversity and inclusion, managing conflict with research groups, tackling bullying and harassment and dealing with mental health disclosures.
- Fellowship Application Training to support ECRs in improving grant writing and interview preparation and therefore increase fellowship application success.

The Deputy Pro Vice Chancellor for Knowledge Exchange led the following activities, initiatives and actions :

- Cross-Campus Impact Capability Scoping to discern best practice in capability training and gaps in the current provision
- Sussex Impact Day – a day of celebration of achievements and sharing information, expertise and learnings from members of Faculty and Professional Services
- Scoping narrative CVs – exploratory work and development to facilitate the use of narrative CVs by researchers to illustrate outputs and outcomes that go beyond publications and 'traditional' publication metrics
- Showcasing impact work by developing a range of audio, visual and text-based format assets to show the diversity of Sussex's achievements in impact
- An online resources hub to act as a central repository for existing and future resources to support impact

Commitment 4: *Using transparent, robust and fair processes to deal with allegations of research misconduct should they arise*

Initiatives and actions in the 2021-22 academic year

Updates made to 'The Procedure' were reviewed and approved by the Research Ethics and Integrity Committee during the last academic year. The amendments and enhancements included:

- Greater clarity to key standards applied to investigations
- Improved signposting to related University processes
- Updates to referenced committees and structures with oversight functions
- Ensuring that essential notifications and consultation occurs when processes risk overlapping

A summary of investigations in allegations of misconduct in research undertaken in 2021-22 is provided below.

Lessons learned from investigations into allegations of misconduct in research

There were four completed investigations into allegations of misconduct in research at the census point for the 2021-22 academic year (1 October 2022). Further details are provided below.

Anonymised accounts of cases are regularly reviewed and considered by the Research Ethics and Integrity Committee.

Following a case involving a PhD student about to undertake a viva examination, the Senior Research Integrity and Governance Manager consulted with the Doctoral School to ensure that the *Procedure* includes makes specific reference to responsibilities to provide support and swift communication of processes that will be undertaken.

Commitment 5: *Working together to strengthen the integrity of research and to reviewing progress regularly and openly*

Initiatives and actions in the 2021-22 academic year

The Senior Research Ethics and Integrity Officer for the Medical School represents the Research Ethics, Integrity and Governance (REIG) team on the recently created Brighton and Sussex Health Research Partnership as a member of the Research Infrastructure Working Group. The Partnership seeks to bring coordinated systems and processes to support clinical research amongst the local university and NHS partners. For the last year, members of the REIG team have represented the university at the Pre-Sponsorship Review Panel which assists individual sponsors by reviewing and recommending studies for sponsorship prior to submission to Health Research Authority processes.

The University is also a member of the Association of University Research Sponsors (AURS) which consists of research-intensive institutions with medical schools who operate within the NHS research environment

The University continues to be represented on the **Animal Materials Working Group (AMWG)**, an initiative of the Sanger Institute which seeks to develop a working framework to address ethical issues in the use and sourcing of animal-derived materials for teaching and research. Members are drawn from universities, research institutes and the commercial sector with representation from the RSPCA.

RESEARCH ETHICS, INTEGRITY AND GOVERNANCE

Internally, the REIG team is represented on two key groups:

- The Open Research Group to champion Open Research, identify best-practice nationally and internationally, initiate events to promote a stronger culture of Open Research at Sussex and develop an Open Research Strategy for the University.
- The newly formed Research Culture Steering Group, which led by the Deputy Pro VC (Research) seeks to oversee a long-term Research Culture strategy, ensuring alignment with the University's Strategic Framework and Values and taking into account the relevant external landscape.

Allegations of Misconduct in Research investigated in the 2021-22 academic year

The University first published a summary of research misconduct allegations in 2013. The aggregated record keeping of research misconduct allegations began in 2010. As required by UK Research and Innovation and Research England, *figures are provided for the past 3 completed academic years with year 1 representing the most recently completed year* (Year 1: 2021-22, Year 2: 2020-21, Year 3: 2019-20). 'Academic years' refers to the period 1 October to 31 September.

There were four completed investigations into allegations of research misconduct in the 2021-22 academic year. All investigations were conducted as per the *Procedure for the Investigation of Allegations of Misconduct in Research*.

Three were investigations in Sciences schools and one in Arts and Humanities.

Two of the four cases were partially upheld and the remaining two cases were dismissed as unfounded. None were referred to subsequent formal processes but where there was limited substance to the initial allegations these were dealt with by education and training or other non-disciplinary approach, such as mediation.

Where and when required, external funders were notified of the cases in line with the Procedure.

RESEARCH ETHICS, INTEGRITY AND GOVERNANCE

The following table shows instances of allegations of research misconduct:

Number of formal investigations completed				Number of allegations upheld (in whole or in part)			
	2019	2020	2021		2019	2020	2021
Fabrication	0	0	1	0	0	1	
Falsification	0	0	0	0	0	0	
Plagiarism	0	4	3	0	2	2	
Misrepresentation	0	0	0	0	0	0	
Breach of duty of care	0	0	0	0	0	0	
Improper dealing with allegations of misconduct	0	0	0	0	0	0	
Other (please specify)	0	0	0	0	0	0	
Total	0	4	4	0	2	3	

Table 1- Formal; investigations of research misconduct (all research- 2019-2021)

A copy of the Procedure can be found on the Research and Knowledge Exchange [web-pages](#)⁴

Approved by Council, 25 November 2022

⁴ <https://www.sussex.ac.uk/webteam/gateway/file.php?name=procedure-for-the-investigation-of-allegations-of-misconduct-in-research-june-2018.pdf&site=377>