ROBERT GORDON UNIVERSITY ABERDEEN

RESEARCH GOVERNANCE AND INTEGRITY POLICY

1.   RESEARCH GOVERNANCE AND INTEGRITY POLICY

1.1   Research governance:

§   defines and communicates clear quality standards concerning *ethics* (encompassing approval, consent, data protection and consumer involvement); scientific quality; the performance of research; safety and finance;

§   puts in place mechanisms to achieve these standards;

§   monitors quality and assesses adherence to these standards.

1.2   The *Concordat to Support Research Integrity*[1] defines research integrity in terms of the following core elements:

§   Honesty in all aspects of research, including in the presentation of research goals, intentions and findings; in reporting on research methods and procedures; in gathering data; in using and acknowledging the work of other researchers; and in conveying valid interpretations and making justifiable claims based on research findings.

§   Rigour, in line with prevailing disciplinary norms and standards: in performing research and using appropriate methods; in adhering to an agreed protocol where appropriate; in drawing interpretations and conclusions from the research; and in communicating the results.

§   Transparency and open communication in declaring conflicts of interest; in the reporting of research data collection methods; in the analysis and interpretation of data; in making research findings widely available, which includes sharing negative results as appropriate; and in presenting the work to other researchers and to the general public.

§   Care and respect for all participants in and subjects of research, including humans, animals, the environment and cultural objects. Those engaged with research must also show care and respect for the stewardship of research and scholarship for future generations.

2.   SCOPE AND PURPOSE

2.1   The *Research Governance and Integrity Policy* addresses the university's obligations and responsibilities regarding research governance. Research is a process of investigation. The term extends to a wide range of methods and approaches, including:

§   empirical enquiry, including both systematic forms of enquiry and exploratory investigation;

§   scholarship, including the synthesis of knowledge and secondary analysis of data;

§   applied research, which seeks to address practical issues through enquiry, consultancy and evaluation; and

§   practice, including creative work and the interpretation and application of knowledge within a professional setting.

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[1]   Universities UK (2012), *Concordat to Support Research Integrity* [accessed 4 February 2016]

2.2   The engagement of members of the university, including researchers, students and other staff, implies roles, rights and responsibilities for the university as an institution. The university has stated its strategic aim for research in '*A Clear Future – for a leading university in a new era*[2]:

> Be recognised for our contribution to the growth of innovation through advancing internationally excellent translational research in our areas of strategic focus.
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> We aspire to:
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> § Focus and develop ambitious translational research around energy and health that addresses key challenges within these sectors.
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> § Develop partnerships in order to access and collaborate in world-class innovation relevant to Scotland.
>
> § Engage with companies and start-ups to grow the investment in Scottish national and regional research and development.
>
> § Create a research environment that nurtures career development and progression, across every level, from a vibrant research student community to a successful professoriate.

2.3   The *Research Governance and Integrity Policy* applies to all those who: engage in research including, for example, hosting research within their Faculty, School or Research Centre; undertaking research; and managing research. It includes both undergraduate and postgraduate students and any individual not otherwise affiliated with the university but who is undertaking research on university premises or using university facilities. The *Research Governance and Integrity Policy* covers all university Faculties, Schools and Research Centres to ensure good practice in research across all disciplines.

2.4   The Committee on Standards in Public Life[3] has endorsed the relevance of the *Seven Principles of Public Life*, first set down by Lord Nolan – honesty, integrity, accountability, leadership, openness, selflessness and objectivity – to all organisations delivering services to the public.

3.   REQUIREMENT FOR A RESEARCH GOVERNANCE AND INTEGRITY POLICY

3.1   To improve the quality of research

"Excellence and integrity are inextricably linked"[4]. A *Research Governance and Integrity Policy* helps to promote more efficient practices, an open ethos conducive to communication, reduction of averse incidents and high ethical standards. Concomitantly, it brings opportunities for improved training and support, especially for inexperienced members of staff and students.

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[2]   Available at www.rgu.ac.uk/about/planning-and-policy/strategy [accessed 4 February 2016]

[3]   Committee on Standards in Public Life, *Ethical Standards for Providers of Public Services - guidance* [accessed 4 February 2016]

[4]   Universities UK (2012), *Concordat to Support Research Integrity* [accessed 4 February 2016]

3.2   To ensure appropriate impact

In the *Research Excellence Framework (REF)* (2014)[5], impact was defined as an effect on, change or benefit to the economy, society, culture, public policy or services, health, the environment or quality of life, beyond academia.

> Impact includes, but is not limited to, an effect on, change or benefit to:
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> §   the activity, attitude, awareness, behaviour, capacity, opportunity, performance, policy, practice, process or understanding;
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> §   of an audience, beneficiary, community, constituency, organisation or individuals;
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> §   in any geographic location whether locally, regionally, nationally or internationally;
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> §   the reduction or prevention of harm, risk, cost or other negative effects.
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> REF (2012) *Assessment framework and guidance on submissions*

3.3   To safeguard the public and achieve public confidence in evidence

The public has a right to expect high scientific, ethical and financial standards, transparent decision-making processes, clear allocation of responsibilities and robust monitoring arrangements. On occasions in the past, public confidence in scientific work has been lost through unreliable research designs and procedures.

3.4   To meet the requirements of funders of research

Funders of research require institutions who host research, whom they fund, to have in place their own published standards of good practice and to have an adequate structure "to promote and promulgate good research practice"[6].

3.5   To protect the researcher

In undertaking research, the demands of practical engagement expose researchers to a variety of risks. The university has both a legal and moral duty to protect its researchers and employees. Researchers need protection to avoid exposure to physical danger, exposure to legal risks and liabilities, and damage to reputation. They should be able to look to the university for support in the event of conflict or personal risk.

A *Research Governance and Integrity Policy* clarify responsibilities, accountabilities and obligations; associated procedures make explicit many elements within research which previously were implicit.

3.6   To protect the position of those affected by research

The university and its researchers have both ethical and legal duties to deal appropriately with the subjects of research. The *Research Ethics Policy* requires

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[5]   REF (2012) *Assessment framework and guidance on submissions* [accessed 4 February 2016]
[6]   Wellcome Trust, *Guidelines on good research practice: November 2005* [accessed 4 February 2016]

researchers to consider the impact of research. Associated procedures make provision for the nature and potential impact of research on others to be considered.

3.7 To protect the interests of the university

Research governance is the means by which the university is able to protect its own interests, position and reputation. It protects its interests through administrative, financial, and legal regulation of research activity. It protects its position, and the position of its staff, through ensuring that research undertaken does not conflict with other objectives, or the interests of other researchers. It protects its reputation by ensuring that research meets high standards of integrity.

4. GENERAL PRINCIPLES

4.1 Integrity

The Wellcome Trust's *Guidelines on Good Research Practice*[7] recommends that researchers should be honest in respect of their own actions in research and in their responses to the actions of other researchers. This is seen to apply to the whole range of research work, including experimental design, generating and analysing data, applying for funding, publishing results and acknowledging the direct and indirect contribution of colleagues, collaborators and others.

4.2 Accountability

Researchers should consider the ethical implications of the research and the social, political, cultural and economic consequences of the work for the participants, funders and the general public.

4.3 Openness

Ethical conduct in research depends not so much on the application of uniform rules as on consideration of the ethical dimensions and implications of one's actions. Researchers are expected to be as open as possible in discussing their work with others, including the public. However, it is recognised that researchers may need, on occasions, to protect their research interest.

In the interest of openness, researchers are recommended to make relevant data and materials available to others (consistent with consents and ethical approvals covering the data and materials, and intellectual property rights) and, where appropriate, deposit data/materials in an open archive[8].

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[7] Wellcome Trust, *Guidelines on good research practice: November 2005* [accessed 4 February 2016]
[8] For a summary of research funders' open access policies relevant to their grant awards, across a large range of disciplines, please refer to the *SHERPA Juliet* site at www.sherpa.ac.uk/juliet/index.php [accessed 4 February 2016]

4.4.   Beneficence and non-maleficence

> The principles of beneficence and non-maleficence are fundamental to all research activity. Beneficence is the requirement to promote the interests and wellbeing of others. It is the ethical principle of 'doing good' in the widest sense. Non-maleficence is the principle of 'not doing harm'. Both principles must be applied to all entities directly or indirectly affected by the research. In practice these principles frequently conflict, for example as in animal versus human welfare.
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> RGU (2014) *Ethics Policy*

4.5   Conflicts of interest

The MRC's *Good Research Practice*[9] indicates that conflicts of interest are not unique to research and that there is nothing inherently unethical in discovering that the researcher is in a position of a conflict of interest. However, it is recommended that this should be acknowledged and dealt with accordingly. Fundamentally, a conflict arises when a researcher's judgement concerning a primary interest, such as scientific knowledge, could be unduly influenced by a secondary interest, such as financial gain or personal advancement. The MRC suggests that the researcher should ask themselves "would I feel comfortable if others learnt about my secondary interest in this matter *or* perceived that I had one?", and further recommend that if the answer is no, the interest must be disclosed and addressed appropriately.

Where the researcher is not fully competent or sufficiently informed to make a fair judgement about the conflicting needs and interests of direct and indirect participants, it is essential that advice is sought.

5.   A FRAMEWORK FOR RESEARCH GOVERNANCE AND INTEGRITY

5.1   Research support

The university will support research by:

- supporting academic staff in the preparation and submission of research proposals;

- promoting commercial opportunities arising from research;

- promoting opportunities for collaboration in research and knowledge transfer;

- reporting on research and knowledge transfer activities;

- supporting the career development of researchers, with reference to the UK-wide *Concordat to Support the Career Development of Researchers*[10], the *Athena SWAN Charter*[11], requirements for research data management, and the UK-wide *Vitae* programme.

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[9]   Medical Research Council, www.mrc.ac.uk/research/research-policy-ethics/ [accessed 4 February 2016]
[10]   Vitae (2008) *Concordat to Support the Career Development of Researchers*, [accessed 4 February 2016]
[11]   Equality Challenge Unit (2015) *Athena SWAN Charter* [accessed 4 February 2016]

5.2   Adherence to legal and procedural requirements

Researchers must comply with all appropriate legislation. The *Data Protection Act 1998*, the *Computer Misuse Act 1990 (c. 18)*, equal opportunities legislation including the *Special Educational Needs and Disability Act 2001* (SENDA), *Disability Discrimination Act 1995* and *Race Relations Amendment Act 2000* (RRAA), the *Obscene Publications Act* and the *Human Rights Act 1998* are likely to be particularly relevant along with relevant legislation on health and safety, and animal rights.

Researchers are expected to comply with the university's *Research Ethics Policy*. Researchers should abide by the code of ethics of any professional body or association of which they are members. Researchers should also be aware of any code of ethics that applies to potential and actual collaborators on the project and/or other participants.

The university's *Research Ethics Policy* has developed a procedure to ensure ethical conduct. The *Research Ethics Policy* makes provision for ethical consideration both before a project is undertaken and while it is in progress. Researchers should ensure that their work considers ethical requirements at all times.

Research involving animals should have approval of the following, through the appropriate bodies: ethical review processes and Home Office Licenses for the institution, the investigator and the project. Researchers should consider at an early stage in the design of any research involving animals, "the opportunities for reduction, replacement and refinement of animal involvement"[12].

5.3   Research Data Management Policy

Research data encompasses a wide range of data types and format which varies between disciplines. There is no single definition of research data but the following may be used as a guide:

> ... "research data" are defined as factual records (numerical scores, textual records, images and sounds) used as primary sources for scientific research, and that are commonly accepted in the scientific community as necessary to validate research findings. A research data set constitutes a systematic, partial representation of the subject being investigated
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> [OECD *Principles and Guidelines for access to research data from Public Funding* 2007]

The university's *Research Data Management Policy* applies to all research outputs created by employees of the university in the course of their employment, where research and publication is an expectation of their employment and where possible to be applied to projects where the university is a collaborative partner. It also applies to postgraduate research students.

It relates to all research data generated from January 2015.

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[12]   Further information available at https://www.gov.uk/research-and-testing-using-animals and National Centre for the Replacement Refinement and Reduction of Animals in Research (NC3Rs)

Principles

i. Research data will be managed to the high standards/in accordance with defined best practice in accordance with Research Councils UK *RCUK Common Principles on Data Policy* and throughout the research data lifecycle as part of the University's commitment to developing research best practice/research excellence.

ii. Responsibility for research data management through the development and adherence to a sound research data management plan during any research project or programme lies primarily with principal investigators.

iii. All new research proposals [from date of adoption] must include research data management plans or protocols that explicitly address data capture, management, integrity, confidentiality, retention, access, sharing, re-use and publication.

iv. The university will provide training, support, advice and where appropriate guidelines and templates for the research data management and research data management plans.

v. The university will provide mechanisms and services for storage, backup, registration, deposit and retention of research data assets in support of current and future access, during and after completion of research projects.

vi. Any data which is retained elsewhere, for example in an international data service or domain repository, must be registered with the university and rights of access maintained.

vii. The legitimate interests of the subjects of research data must be protected.

viii. Research data of future historical interest, and all research data that represent records of the university, including data that substantiate research findings, will be offered and assessed for deposit and retention in a university repository or an appropriate national or international data service or domain repository,

ix. Exclusive rights to reuse or publish research data must not be handed over to commercial publishers or agents without retaining the rights to make the data openly available for re-use, unless this is a condition of funding.

RGU (2015) *Research Data Management Policy*

5.4   Responsibilities and accountabilities

Implementing research governance involves establishing responsibilities and accountabilities for research. A senior individual must be designated as the principal investigator to take responsibility for the conduct of the research and to be accountable for this to their employers.

The principal investigator will have responsibility for:

Procedures

(i)   ensuring the study complies with all legal and ethical requirements;

(ii)   ensuring that the university's research proposal authorisation process is adhered to;

(iii)   ensuring that the research is carried out in accordance with this *Research Governance and Integrity Policy*;

(iv)   ensuring that controlled trials are registered;

(v)   monitoring that the requirements of funders and supervisory bodies are met;

(vi)   ensuring that undertakings given to research subjects, participants and stakeholders are respected and conformed to;

(vii)   timely reporting of the progress and outcomes of the work required by the sponsor, funders, or others with a legitimate interest and ensuring they are of an acceptable standard;

(viii)   the findings from the work being opened to critical review through accepted scientific and professional channels;

(ix)   ensuring arrangements are in place for the management of any intellectual property arising;

(x)   all data and documentation associated with the study are available for audit at the request of the appropriate auditing authority;

(xi)   ensuring procedures are in place to ensure collection of high quality, accurate data and the integrity and confidentiality of data during processing and storage;

(xii)   ensuring arrangements are made for the appropriate archiving of data when the research has finished.

Staff

(i)   ensuring that each member of the research team is qualified by education, training and experience to discharge his/her role in the study;

(i)   students and new researchers receive adequate supervision, support and training;

(ii)   detecting and preventing scientific misconduct by adopting the role of guarantor for published outputs.

5.5   Contractual responsibilities

Contracts for research are made by and in the name of the Robert Gordon University, not the researcher. The responsibility for determining the content of and administering contracts consequently rests with the university. Because the effect of submitting a proposal may be to commit the university to a course of action, the university has to be in a position to approve or disapprove the undertakings being made in its name. The terms of research undertaken on behalf of a sponsor must should be agreed in advance. Terms will include: the specification of the research project; the roles and responsibilities of the researchers, the university and the sponsor; and agreement on the dissemination and exploitation of the research outputs. The need for confidentiality or non-disclosure agreements must be negotiated in advance. Issues of pre-existing rights and other legal issues should be clarified in advance.

5.6   Intellectual property rights

Researchers will adhere to the *Intellectual Property Rights (Staff and Students) Policies*[13] and other internal and external policies and agreements regarding ownership, exploitation and income from intellectual property. The researcher should furnish the sponsor with research reports and other deliverables as agreed in the original contract.

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[13]   Under 'Commercialisation' tab [accessed 4 February 2016]

5.7   Supervision

All staff in executive and senior roles will undertake to sustain a research culture of mutual co-operation in the university, where all individuals, or members of research teams, are encouraged to develop their skills and engage in the open exchange of ideas. It will be the responsibility of Research Institute Directors, Heads of School/Associate Deans and Heads of Research Centres to ensure that appropriate supervision of researchers is provided. The university will provide, as appropriate, training in supervisory skills through a structured framework of staff development for research staff.

Supervisors are required to supervise all stages of the research process, including: outlining or drawing up hypotheses or research questions; preparing applications for funding; protocol design; data recording; and analysis. It is the responsibility of the supervisor to communicate best practice to supervisees as soon as possible. All researchers will undertake appropriate training in, for example: research design; regulatory issues; confidentiality; data management and protection; record keeping.

The university will inform all staff of the *Research Governance and Integrity Policy* and undertake to provide opportunities for appropriate staff development.

All research students will receive training in relation to Research Governance as part of their induction, and throughout their participation in the Postgraduate Certificate Research Methods course. No student will be allowed to progress to research study at doctoral level unless they have satisfactorily completed such training or have equivalent experience.

6.   MONITORING

All research within the university shall be open for scrutiny and all projects shall be open to internal audit in respect of key indicators such as legal requirements, ethical approval, and adherence to guidelines for financial reporting.

All university policies and procedures, whether existing or subsequently approved, must be adhered to including those for the ethical approval of the research. Research which involves human participants and has an ethical dimension will be referred either to the university's Research Integrity and Ethics Sub-Committee or, where appropriate, some other relevant external research ethics committee. For instance, all research which falls within the remit of NHS Grampian and the University of Aberdeen will need approval from the North of Scotland Research Ethics Committee[14] prior to the start of the research.

Publication in the form of peer-reviewed public output provides the opportunity for external and public monitoring. It is recommended that there are clear agreements, made at an early stage of the research, between team members about publication, when, by whom and where. It is recommended that researchers should refer to published guidance on publications, for example, the International Committee of

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[14]   http://www.nhsresearchscotland.org.uk/services/research-ethics [accessed 4 February 2016]

Medical Journal Editors. It should be a priority of the principal investigator to ensure the reporting of funded research in peer-reviewed public output (where appropriate), unless there are exceptional circumstances such as commercially-sponsored research where assurances of confidentiality have been given.

7.   RESEARCH MISCONDUCT

For the purposes of the *Research Governance and Integrity Policy*, research misconduct includes the following (though is not limited to):

(i)   failure to follow the procedures necessary for effective governance;

(ii)   deception in relation to research proposals;

(iii)   unethical behaviour in the conduct of research, for example in relation to research participants;

(iv)   breach of trust;

(v)   deviation from good research practice, where this results in unreasonable risk of harm to humans, other animals or the environment;

(vi)   fabrication, falsification or corruption of research data;

(vii)   distortion of research outcomes, by distortion or omission of data that do not fit expected results;

(viii) dishonest misinterpretation or misreporting of results;

(ix)   plagiarism, or passing off another person's work as one's own;

(x)   fraud or other misuse of research funds or research equipment;

(xi)   attempting, planning or conspiring to be involved in research misconduct;

(xii)   inciting others to be involved in research misconduct;

(xiii) collusion in or concealment of research misconduct by others.

Cases of gross ethical misconduct by staff of the university will be dealt with under the university's *Disciplinary Policy and Procedure*[15]. Cases of gross ethical misconduct by students or research students of the university will be dealt with under the university's *Student Misconduct Procedure*, as contained in *Academic Regulation A3: Student Conduct and Appeals: Section 2*[16].

All members of staff are encouraged to report, in a responsible manner, any suspected cases of such misconduct. This should be done directly to the appropriate Head of School/Associate Dean, Head of Department or Centre, or the Dean of Faculty, or with reference to the university's *Policy and Procedure on Disclosures in the Public Interest (Whistleblowing)*[17].

Where a member of staff is also a member of a professional, statutory and regulatory body, and is required by that professional, statutory and regulatory body to report where serious misconduct involving another full or student member of that professional, statutory and regulatory body is suspected or has occurred, the member

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[15]   Available at www.rgu.ac.uk/about/planning-and-policy/policies/policies
[16]   Available at www.rgu.ac.uk/academicregulations
[17]   Available at www.rgu.ac.uk/about/planning-and-policy/policies/policies.

of staff is required to advise the university, at the same time, that such a report has been made.

The university will monitor cases of research misconduct in terms of the number of allegations received and investigated and lessons to be learned by the university or wider research community.

8.   RESEARCH GOVERNANCE AND INTEGRITY POLICY REVIEW

The *Research Governance and Integrity Policy* is subject to regular review and amended accordingly to reflect changes in national and local policies, as well as professional and agency guidelines. Any such amendments requires the approval of the university's Board of Governors.

Version 1: Approved Board of Governors, 23 June 2003
Version 2: Approved Board of Governors, 25 March 2004
Version 3: Approved Board of Governors, 18 December 2008
Version 4: Approved Board of Governors, 25 March 2010; section 4.3 updated 14 October 2010; updated 29 July 2011
Version 5: Updated 02 September 2014
Version 6: *draft*