Principles and Standards of Conduct on the Governance of Research

Introduction

Background and Acknowledgement

This document is based on the guidance published by the UK Research Integrity Office (August 2008) on "Procedure for the Investigation of Misconduct in Research" and the Research Councils UK (March 2009) "Policy and Code of Conduct on the Governance of Good Research Conduct". The document is also aligned to "Concordat to support research integrity", published by Universities UK (July 2102).

http://www.universitiesuk.ac.uk/highereducation/Pages/Theconcordattosupportresearchintegrity.aspx

HEFCE has made compliance with the Concordat a condition specified in institutions' funding agreements (the annual assurance statement).

Governance

The University's Research Committee (RC) is responsible for ensuring that any Research activity undertaken by staff or students meets the highest standards and is in line with this Policy and Code of Conduct on the Governance of Research. RC has delegated authority and responsibility as a sub-committee of the Academic Board in relation to Research activity.

All Research should be conducted to the highest levels of integrity, including appropriate research design and frameworks, to ensure that findings are robust and defensible. Researchers should also adhere to the highest level of research ethics in line with requirements set out by national and international regulatory bodies, professional and regulatory research guidance, and research ethics frameworks issued in appropriate areas.

The onus lies with the Researcher to establish that s/he has always met the highest standards that could reasonably be expected of them, and with Coventry University to ensure that best practice principles and standards are in place to support and reinforce this. These principles and standards apply to all Research irrespective of whether it is unfunded, internally funded or externally funded through Research Councils, other public monies, or any other sources.

Principles

Introduction

Coventry University and its **staff and students** should adhere to the following principles which set out the responsibilities and values relevant to Research. While some elements may seem self-evident, and there is some overlap, these principles aim to encourage all involved in Research to consider the wider consequences of their work and to engage critically with good practice in Research rather than treating codes of practice such as this as just another procedure to be followed.

Honesty

Coventry University and its **staff** and **students** should be honest in relation to their own research and that of others. They should do their utmost to ensure the accuracy of data and results, acknowledge the contributions of others, and neither engage in misconduct nor conceal it. **Coventry University** maintains a culture that encourages and supports honesty.

Integrity

Coventry University and its **staff** and **students** should comply with all legal and ethical requirements relevant to their field of study. They should declare any potential or actual conflicts of interest relating to research and where necessary take steps to resolve them.

Co-operation

Coventry University and its **staff** and **students** promote the open exchange of ideas, research methods, data and results and their discussion, scrutiny and debate, subject to any considerations of confidentiality.

Accountability

Coventry University and its **staff** and **students** recognise that in and through their work they are ultimately accountable to the general public and should act accordingly. They should ensure that any Research undertaken complies with any agreements, terms and conditions relating to the project, and allows for proper governance and transparency. **Staff and students** must follow the requirements and guidance of any professional bodies of which they are members.

Training and skills

Coventry University provides training and opportunities for development for their Researchers and the necessary resources to enable them to conduct research to the required standards. **Staff and students** should ensure that they have the necessary skills, training and resources to carry out research in the proposed research team or through collaboration with specialists in relevant fields, and report and resolve any unmet needs identified.

Safety

Coventry University and its **staff** and **students** should do their utmost to ensure the safety of all involved in Research whether researchers, research subjects, patients, participants or others.

Standards

Introduction

Coventry University and its **staff and students** should comply with the following core standards which should be interpreted in light of the above principles.

General Guidance

Staff and **students** should:

- Follow the principles of good practice in Research and seek guidance when necessary to ensure that all Research activity complies with them.
- Comply with all legal and ethical requirements and other guidelines that apply to their Research activities. This includes submitting Research proposals for ethical review where appropriate and abiding by the outcome of that review.
- Ensure that Research projects are approved by all applicable bodies, ethical, regulatory or otherwise.
- Ensure that they have the necessary training, resources and support to carry out their Research.
- Consider good practice to be a routine part of Research activity and actively monitor how guidance on good practice might be developed or revised.
- Be aware that collaboration with researchers and/or organisations in other countries does not absolve organisations or researchers based in the UK from complying with the legal and ethical requirements existing in the UK.

Leadership and Supervision

Staff and **students** should:

- Promote and maintain an environment which allows for Research of high ethical standards, mutual co-operation, professionalism and the open and honest exchange of ideas.
- Foster a culture where good conduct in Research is promoted and inappropriate conduct is identified and addressed.
- Ensure clear direction and supervision of Research which sets out clear lines of accountability for the organisation and management of the activity.
- Undertake career development through training and mentoring of new, emerging and established Researchers.
- Ensure that they have the necessary training, time and resources to carry out Research supervision or development of others and request appropriate support if required to fulfil that role.

Training and Mentoring

Staff and **students** should:

- Identify needs for training when they arise and report them to their supervisor or line-manager or other appropriate person.
- Undergo training and mentoring in order to carry out their duties and to develop their knowledge and skills throughout their career, repeating training where necessary to ensure that skills are kept up-to-date.

Research Design

Staff and **students** should ensure that:

- The question(s) being asked by the proposed Research is (are) appropriate and designed to add to whatever is already known about the subject in question or the methods for researching that subject.
- The design of the study is appropriate for the question(s) being asked and addresses the most important potential sources of bias.
- All necessary skills and experience will be available to carry out the proposed Research in the proposed research team or through collaboration with specialists in relevant fields.
- Sufficient resources will be available to carry out the proposed Research and that these resources meet all relevant standards.
- Any issues relating to the above are resolved as far as possible prior to the start of the Research project.
- Any alterations to previously approved designs of research projects are subject to review to determine that they will not compromise the integrity of the research.

Collaborative Working

Staff and students should:

- Be aware of the standards and procedures for the conduct of Research followed by any organisations involved in any collaborative research that they are undertaking.
- Pay particular attention to projects which include participants from different countries or where work will be carried out in another country due to the additional legal and ethical requirements and other guidelines that may apply.
- Work with partner organisations to ensure the agreement of, and compliance with, common standards and procedures for the conduct of collaborative Research including the resolution of any issues or problems that might arise and the investigation of any allegations of misconduct in Research if they occur.
- Try to anticipate any issues that might arise as a result of working collaboratively and agree jointly in advance how they might be addressed. In particular, agreement should be sought on the specific roles of the Researchers involved in the project and on issues relating to intellectual property, publication, and the attribution of authorship.

Conflicts of Interest

Staff and **students** should:

- Declare any potential or actual conflicts of interest where personal or institutional factors might influence professional roles or responsibilities in relation to their Research project to their line manager or supervisor and on the ethics review form. Conflicts of interest should be disclosed as soon as staff and students become aware of them.
- Be aware that potential conflicts of interest often arise from financial considerations but can relate to any personal or institutional factor which is in some way dependant on or affected by the outcome of an Research project.
- Be aware that a potential conflict of interest does not inevitably lead to an actual conflict of interest or poor practice in Research but it is important that it is recognised and not concealed.

- Only proceed with an Research project where there is a conflict of interest if Coventry University, other interested parties and the relevant ethics committees are satisfied that the conflict of interest does not compromise the validity or integrity of the Research.
- Keep a record of all decisions made and any limits applied with regard to conflicts of interest in Research.
- Agree to abide by any direction given by Coventry University and the ethics review process in relation to a conflict of interest. This includes adhering to limits on their activities to contain and manage any conflict of interest and, where conflicts of interest are judged to be questionable, not proceeding with the activity.

Research involving Human Participants, Material or Data
Staff and **students** should:

- Submit Research projects involving human participants, material or data for ethical review and abide by the outcome of that review as defined by the current ethical review policy and procedures.
- Ensure that any Research projects involving human participants, material or data complies with all legal and ethical requirements and other applicable guidelines and that Research projects have been approved by all applicable bodies, ethical, regulatory or otherwise.
- Ensure that Research with, or under the auspices of any of the UK Departments of Health and/or the National Health Service must adhere to all relevant guidelines, for example, the Department of Health's *Research Governance Framework for Health and Social Care*.
- Ensure that extreme care is taken when an Research project involves minors or vulnerable adults. In cases where research involves young people under the age of 16 as participants, written consent to participation is required from **both** a parent or guardian and the participant concerned. In cases where the participants are too young to understand what they are signing care must be taken to explain verbally the purpose of the research and verbal assent must be obtained from them. An exception may be made for projects involving children **only** where participation would be considered part of the typical activities engaged in at that research site (e.g. in a school setting, work which would be considered part of normal school lessons, such as curricular activities and academic assessments of the kind which might normally be delivered by the school). Researchers may then apply for ethical approval to obtain written consent from gatekeepers (e.g. schools) to recruit children directly into such low risk projects on site, but parents must be fully informed about the project before the children are approached and be given a reasonable opportunity to discuss the work and withdraw their child from it if they so wish. Research, which can be done equally well on adults, should not be done on children. Research, which does not benefit the child, must not involve more than a very small risk. Very ill patients should still be asked for consent if this is possible. If not, a close relative may be asked, though this has no legal standing. Research on people with severe mental health problems requires special safeguards. This usually means someone else is involved as well as the patient and researcher to protect the person's interest. In all cases care must be taken to explain the nature and purpose of the research in a way that the participant can understand.
- Ensure the confidentiality and security of personal data relating to human participants in research and of human material involved in research projects.

Research Involving Animals

Staff and **students** should:

- Consider the opportunities for reduction, replacement and refinement of involving animals in Research projects and should refer to the relevant guidance.
- Ensure that Research projects involving animals adhere to all legal and ethical requirements and other applicable guidelines.
- Submit Research projects involving animals to ethical review and abide by the outcome of that review.
- Ensure that such Research projects have been approved by all applicable bodies, ethical, regulatory or otherwise.

Health and Safety

Staff and **students** should:

- Ensure that all Research activities are carried out in premises which fulfil all requirements of current UK Health and Safety legislation and good practice.
- Ensure that all Research activities which involve potentially hazardous or harmful material or which might cause harm to the environment complies with all legal requirements and other applicable guidelines.
- Ensure that all Research activities are appropriately reviewed using Coventry University's approved Health and Safety review procedures and are undertaken in line with the outcome of that review.

Intellectual Property

Staff and **students** should:

- Ensure that any contracts or agreements relating to research include provision for ownership and use of intellectual property. Intellectual property includes, but is not limited to, research data and other findings of research ideas, processes, software, hardware, apparatus, equipment, substances, materials and literary and artistic works.
- Ensure there is no prior disclosure of research or the findings of research when this might invalidate any commercial property rights that could result.
- Recognise that there is a presumption that any intellectual property discovered or developed using public or charitable funds should be disseminated in order to have a beneficial effect on society at large. This presumption may be rebutted where there is an express restriction placed on any such dissemination. Any delay in publication and dissemination pending protection of intellectual property should be kept to a minimum.
- Clearly state when their standard guidance might not apply, for example, a University would normally waive copyright of articles prepared for publication in journals or books.
- Try to anticipate and resolve any issues that might arise relating to intellectual property at the earliest opportunity, especially when collaborating with other researchers.

Finance

Staff and **students** should:

- Ensure that the terms and conditions of any grant or contract related to Research projects are adhered to.
- Use clear guidelines regarding the purchasing or procurement of materials, equipment or other resources for research and the hiring of staff for research projects. These guidelines should include statements on the ownership of resources and the rights of researchers to use them as well as procedures for the monitoring and audit of finances relating to research projects.
- Co-operate with any monitoring and audit of finances relating to Research projects and report any concerns or irregularities to the appropriate person(s) as soon as they become aware of them.

Collection and Retention of Data

Staff and **students** should:

- Comply with all legal, ethical and organisational requirements for the collection, use and storage of data, especially personal data. They should also maintain confidentiality where undertakings have been made to third parties or to protect intellectual property rights.
- Ensure that research data relating to publications is available for discussion with other researchers, subject to any existing agreements on confidentiality.
- Research data should be kept intact for any legally specified period and otherwise for at least three years from the end of the project, and in a form that would enable retrieval by a third party, subject to limitations imposed by legislation and general principles of confidentiality. Certain disciplines, such as health and biomedicine, may require research data to be retained for a considerably longer period and any subject-specific requirements must be complied with.
- Have in place procedures, resources and administrative support to ensure the accurate and efficient collection of data according to the agreed design of the research project and ensure it is stored in a secure and auditable form.

Monitoring and Audit

Staff and **students** should:

- Ensure that Research projects include requirements for all necessary monitoring and audit at an early stage in their design.
- Comply with internal monitoring and auditing requirements of Research projects to ensure that they are being carried out to a sufficient standard and in accordance with legal and ethical requirements and any other guidelines.
- Ensure that staff charged with carrying out such monitoring and audits have sufficient training, resources and support to fulfil the requirements of the role.
- Co-operate with the monitoring and audit of their Research projects by applicable bodies and undertake such when required. If they become aware of a need for monitoring and audit where it is not already scheduled, they should report that need to the appropriate person.

Peer Review

Staff and **students** should:

- Read and familiarise themselves with relevant processes and standards for peer review, which is an important part of good practice in the publication and dissemination of research and research findings. They should make sure that research undergoes peer review before it is published or otherwise disseminated in the public domain.
- Encourage researchers to act as peer reviewers and support those who do so. They should recognise the obligations of peer reviewers to be accurate and honest in their work, to maintain confidentiality, and should not put pressure, directly or indirectly, on peer reviewers to breach these obligations.
- Carry out peer reviews accurately and honestly following the guidelines for peer review of any journal for which they carry out such work.
- Maintain confidentiality and not retain or copy any manuscripts under review. They should not make use of research or research findings from a paper under review without the express permission of the author(s) and should not allow others to do so.
- Inform the editor/conference chair of the relevant journal/conference in confidence if they become aware of possible misconduct while carrying out peer review.

Publication and Authorship

Staff and **students** should:

- Accept their duty to publish and disseminate Research in a manner that reports the research and the findings of the research accurately and without selection that could be misleading.
- Ensure that sponsors and funders of Research respect the duty of Researchers to publish their research and the findings of their research and that they do not discourage publication or dissemination.
- Provide support to assist Researchers in the publication and dissemination of research and the findings of research that involves confidential or proprietary information, issues relating to patents or intellectual property, contractual or other legal obligations and/or interest from the media or the general public.
- Address issues relating to publication and authorship, especially the roles of all collaborators and contributors, at an early stage of the design of the project.
- Ensure authorship is restricted to those contributors and collaborators who have made a significant intellectual or practical contribution to the work; no person who fulfils the criteria for authorship should be excluded from the submitted work.
- Ensure authorship is not allocated to honorary or guest authors and that anyone listed as an author of any work is responsible for ensuring the accuracy of that work and should be able to identify their contribution to it.
- List the work of all contributors who do not meet the criteria for authorship in an acknowledgements section. All funders and sponsors of research should be clearly acknowledged and any competing interests listed.
- Clearly acknowledge all sources used in their research and seek permission from any individuals or an organisation if a significant amount of their work has been used in the publication.

- Not attempt to submit simultaneously a publication to more than one potential publisher (duplicate submission) and that any duplicate publication without disclosure is unacceptable.
- Discuss with the appropriate person(s) the reasons why they have been discouraged from publishing and disseminating their Research or its findings so that the matter can be resolved.

Misconduct in Research

Staff and **students** should:

- Know what constitutes misconduct in Research and report any suspected misconduct through the relevant procedure as soon as they become aware of it. Those who raise concerns about the conduct of Research in good faith will **not** be penalised.
- Be aware that any misconduct in research is unacceptable and that anyone found to have committed misconduct in Research will be subject to a formal disciplinary procedure to investigate allegations of misconduct.
- Be aware that all allegations of Research misconduct are investigated thoroughly and fairly and in a timely manner by staff who have the necessary training, resources and support to fulfil the requirements of the role.
- Co-operate with any investigation of misconduct in research when requested and should work to support those who raise concerns in good faith about the conduct of research and those who have been exonerated of suspected misconduct.

Misconduct in Research

Introduction

This code is relevant to all individuals involved in Research irrespective of the subject, entry route into or any other consideration. This includes:

- Academic staff
- Research support staff
- All students
- Research managers and administrators

All are expected to observe the highest standards of research integrity and to embed good practice in all aspects of their work, including the training of new Researchers. They must operate honestly and openly in respect of their own actions and in response to the actions of others involved in Research [1].

Definitions

Individuals involved in Research must not commit any of the acts of misconduct specified in this section. Coventry University will investigate all allegations of unacceptable Research conduct and in proven cases will notify the matter to the research funder, appropriate professional or statutory

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[1] See Council for Science and Technology, Universal Ethical Code for Scientists (2006)

bodies and potentially to the police for further investigation and sanction. Unacceptable conduct includes each of the following:

Fabrication
This includes the creation of false data or other aspects of research, including documentation and participant consent.

Falsification
This includes the inappropriate manipulation and/or selection of data, imagery and/or consents.

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

Misrepresentation
This includes:

- Misrepresentation of data, for example, suppression of relevant findings and/or data, or knowingly, recklessly or by gross negligence, presenting a flawed interpretation of data.
- Undisclosed duplication of publication, including undisclosed duplicate submission of manuscripts for publication.
- Misrepresentation of interests including failure to declare material interests either of the Researcher or of the funders of the Research.
- Misrepresentation of qualifications and/or experience, including claiming or implying qualifications or experience which are not held.
- Misrepresentation of involvement, such as inappropriate claims to authorship and/or attribution of work where there has been no significant contribution, or the denial of authorship where an author has made a significant contribution.

Mismanagement or Inadequate Preservation of Data and/or Primary Materials

This includes failure to:

- Keep clear and accurate records of the research procedures followed and the results obtained, including interim results data.
- Hold records securely in paper or electronic form.
- Make relevant primary data and research evidence accessible to others for reasonable periods after the completion of the research; data should normally be preserved and accessible for ten years but for projects of clinical or major social, environmental or heritage importance, it should be kept for 20 years or longer.
- Manage data according to the research funder's data policy, and all relevant legislation.
- Wherever possible, deposit data permanently within a national collection.

The Principal Investigator is responsibility for proper management and preservation of data and primary materials.

Breach of Duty of Care
This includes deliberately, recklessly or by gross negligence:

- Disclosing improperly the identity of individuals or groups involved in research without their consent, or other breach of confidentiality.
- Placing any of those involved in research in danger, whether as subjects, participants or associated individuals, without their prior consent and without appropriate safeguards even with consent; this includes reputational danger where that can be anticipated.
- Not taking all reasonable care to ensure that the risks and dangers, the broad objectives, and the sponsors of the research are known to participants or their legal representatives, in order to ensure appropriate informed consent is obtained properly, explicitly and transparently.
- Not observing legal and reasonable ethical requirements or obligations of care for animal subjects, human organs or tissue used in research or for the protection of the environment.
- Improperly conducting peer review of research proposals or results (including manuscripts submitted for publication), failing to disclose conflicts of interest, inadequately disclosing clearly limited competence, misappropriation of the content of material and breach of confidentiality or abuse of material provided in confidence for peer review purposes.

Reporting and Investigation

Reporting

All allegations of unacceptable Research conduct should be reported as soon as possible to the following post holders:

- Students – Faculty Registrar
- Staff – Associate Dean (Research) for Faculty-based staff or Director of Research or Deputy-Vice-Chancellor (Academic)

Investigation

All allegations of unacceptable Research conduct are investigated under the appropriate disciplinary policy and procedure:

- Staff Disciplinary Policy
- Students Disciplinary Policy

While Coventry University's disciplinary policy and procedures are not as detailed as the model procedure set out by UK Research Integrity Office, the investigation procedures are equally rigorous. There is also no inconsistency between the disciplinary policy and procedures or the approach recommended by the Research Councils UK.

Sanctions for Misconduct

The spectrum of inappropriate behaviour is wide ranging from minor misdemeanours which may happen occasionally and inadvertently to significant acts of misappropriation or fabrication.   Poor practices, such as weak procedures or inadequate record-keeping which may jeopardise the integrity of the research but might only require further training or development rather than formal disciplinary action are normally a matter solely for Coventry University. However, in some cases the actions of staff and students may be subject to the appropriate disciplinary procedure. This may result in sanctions up to and including dismissal from Coventry University and notification to Research Councils, professional or statutory bodies and potentially to the police for further investigation and sanction. Failure to follow Coventry University's policies and procedures may also invalidate the insurance cover provided by the University's insurers and make the member of staff or student personally liable for the consequences.

Revised: August 2013

Good Practice Checklist

The checklist identifies the key points of good practice in Research and is applicable to all subject areas.

Before conducting your Research:	Yes or No
1. Is your research question appropriate and designed to add to whatever is already known about the subject in question or the methods for researching that subject?	
2. Is your research design appropriate for the question(s) being asked?	
3. Will you have access to all necessary skills and resources to conduct the research?	
4. Will your research comply with all legal and ethical requirements and other applicable guidelines, including those from other organisations and/or countries if relevant?	
5. Will your research comply with all requirements of legislation and good practice relating to health and safety?	
6. Has your research undergone ethical review, especially if it involves animals or human participants, material or personal data?	
7. Have you made provision for all necessary monitoring and audit?	
8. Are you in compliance with any contracts and financial guidelines relating to the project?	
9. Have you reached an agreement relating to intellectual property, publication and authorship?	
10. Have you reached an agreement relating to collaborative working if applicable?	
11. Have you agreed the roles of the Researchers and responsibilities for management and supervision?	
12. Have all conflicts of interest relating to your research been identified and resolved?	
13. Are you aware of the guidance from all applicable organisations on misconduct in research?	
When conducting your Research:	**Yes or No**
1. Are you following the agreed research design for the project?	
2. Have any changes to the agreed research design been reviewed and approved?	
3. Are you following best practice for the collection, storage and management of data?	
4. Are agreed roles and responsibilities for management and supervision being fulfilled?	
5. Is your research undergoing all necessary monitoring and audit?	
When finishing your Research:	**Yes or No**
1. Will your research and its findings be reported accurately, honestly and promptly?	
2. Will all contributions to the research be acknowledged?	
3. Are agreements relating to intellectual property, publication and authorship being complied with?	
4. Will research data be retained in a secure and auditable form and for the required duration?	
5. Will your research comply with all legal, ethical and contractual requirements?	