Compliance with the Concordat to Support Research Integrity

In July 2013 HEFCE confirmed that from 2013/14, it expects each university to comply with the UK Concordat to Support Research Integrity (UK RIConcordat) in order to remain eligible for receipt of HEFCE research funding. The UK RIConcordat contains 5 commitments, each of which specifies actions for universities as employers, for individual researchers and for research funders. As of 2013/14, HEFCE requires each university to submit a signed statement in its annual assurance return assuring HEFCE of the University’s compliance with the UK RIConcordat.

In addition, a specific requirement of the UK RIConcordat is set out under Commitment 5; namely, that employers of researchers present a short annual statement to their own governing body that:

- Provides a summary of actions and activities that have been undertaken to support and strengthen understanding and application of research integrity issues (for example postgraduate and researcher training, or process reviews);
- Provides assurances that the processes they have in place for dealing with allegations of misconduct are transparent, robust and fair, and that they continue to be appropriate to the needs of the organisation;
- Provides a high-level statement on any formal investigations of research misconduct that have been undertaken.

The statement below has been prepared for this purpose by Research & Innovation Services in consultation with HR, Student Services, CiCS and the Named Information Officer. This is the fourth iteration of this statement since the above requirement was introduced. The statement will be made publicly available as required by the Concordat, on both the Council’s web page and the University's central Research Ethics and Integrity website.

Statement to Council:

The University of Sheffield’s Compliance with the Concordat to Support Research Integrity

The University of Sheffield is fully committed to the ongoing development of a culture that supports and nurtures research integrity, and to ensuring that mechanisms are in place to provide assurances and ensure appropriate investigation and action if and when things go wrong. A summary of the actions and activities undertaken by the University in meeting the requirements of the Concordat to Support Research Integrity are outlined below, within each of the five Commitments outlined in the Concordat.

Commitment 1: We are committed to maintaining the highest standards of rigour and integrity in all aspects of research

The Concordat states that employers of researchers are responsible for:
1. Collaborating to maintain a research environment that develops good research practice and nurtures a culture of research integrity;
2. Supporting researchers to understand and act according to expected standards, values and behaviours, and defending them when they live up to these expectations in difficult circumstances.

Actions and activities in place/undertaken in relation to point 1:

- A revised Good Research & Innovation Practices (GRIP) policy has been in place since 2011. This was developed by a group of academics with representation from across the University, and all staff and students were consulted before the final version was published. The policy includes three sections:

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1 UUK published the UK RIConcordat in July 2012 (co-signed, inter alia, by RCUK, Wellcome, HEFCE, Dept of Health): www.universitiesuk.ac.uk/Publications/Documents/TheConcordatToSupportResearchIntegrity.pdf
(1) Good Research and Innovation Principles, which explains the principles governing all research and innovation activities at the University, the purpose of the policy, its value and to whom it applies. The University believes that research integrity is about how research and innovation activities are undertaken from start to finish, not only in terms of paying attention to detail at all stages to ensure the accuracy and credibility of data and results, but also in terms of behaviour towards people involved in and/or affected by the research and/or innovation activity;

(2) Good Research and Innovation Practices, which clarifies the University’s expectations concerning good practices in specific research and/or innovation activities (e.g. authorship; collaboration), and;

(3) an Annex, which contains information on what the University means by unacceptable research & innovation practices and thus potential research misconduct (encompassing fabrication, falsification and plagiarism, misrepresentation, mismanagement of data or primary material, breach of duty of care, abuse of status, and taking reprisals against an individual who made an allegation of misconduct/attempting to cover up reprisals taken against the individual), as well as additional detailed supporting information including links to other relevant policies and procedures. The policy is available in full from the University’s central research web pages (www.shef.ac.uk/ris/other/gov-ethics/grippolicy).

A leaflet summarising the key principles of the Good Research & Innovation Practices policy has been developed for use as a promotional tool (e.g. to be provided during staff/student inductions).

Mandatory training for all postgraduate students on research ethics and integrity, delivered at Faculty level, has been in place since 2011. The training is tailored to the cognate disciplines that comprise each Faculty but governed by a consistent structure: a. an inspiring introductory lecture followed by b. action learning study wherein students discuss case studies brought before them which, in turn, is followed by c. action learning study wherein students bring to the table for discussion cases based on their own experiences and ending in d. self-reflection exercise. The desired outcomes are two-fold: a. to encourage PGRs to critically analyse/reflect upon their own actions and behaviours and their interactions with others involved in their research and b. to heighten PGRs’ ethical sensitivity and reasoning. Many of the Faculties now have in place alternative training processes to enable part-time and distance learning students to benefit from the training. During the 2015-16 academic year, a series of videos have been developed, showing academics discussing particular research integrity challenges that they have come across in their careers, for use as discussion materials within this training.

The University has purchased and promoted both an online research integrity course aimed at postgraduate research students and post-doctoral researchers, and an on-line research integrity self-assessment exercise aimed at more established academics. This is promoted to all new staff in their induction pack, and is also used as part of the Faculty ethics and integrity training for postgraduate research students. An updated version of the online course has been under development in consultation with the University, and will shortly be made available for Faculties to use within their postgraduate research student training. This version includes an ‘impact assessment system’ (i.e. an in-built test) that will enable course leaders to assess students’ learning from undertaking the online course itself as well as other learning activities that take place as part of the training. The enhanced version of the online course will also be promoted to staff and students across the University in a variety of ways.

Other centrally-run workshops for staff and/or students are held on a needs basis, addressing relevant topical research integrity issues. In July 2016 the University held a workshop for senior academics entitled ‘Guardians of Research Rigour and Reputation’, which focussed on how journals and academic departments can work together to ensure the rigour and reputation of research. The workshop involved a presentation from Dr Ritu Dhand, Editorial Director of Nature, offering the publisher’s perspective, whilst a departmental perspective was provided by the Head of Department for Animal and Plant Sciences. The event also involved discussion activities, and a report, video and other resources have been made available on the University’s ethics & integrity webpages so that those unable to attend may benefit.

A research project was completed in 2015/16 that aimed to investigate the factors that combine to create a healthy and competitive research environment, i.e. one that is both productive and which upholds the highest standards in research. A web tool has been developed to show the findings in an
interactive and engaging way, and this will be publicised across the University in 2016/17 with a view to sharing the good practices identified, and assisting research leaders in developing their own research environments. Further details are provided in relation to Commitment 3.

Actions and activities in place/undertaken in relation to point 2:

- As part of the induction process a staff induction portal was launched in Spring 2014 that includes signposting of key policies that all new staff should seek to familiarise themselves with (split into key timeframes such as first day, first week, first month). These include the University’s: Public Interest Disclosure (Whistleblowing) policy, Investigating and Responding to Allegations of Research Misconduct Policy, and Good Research & Innovation Practices Policy (GRIP).
- A new Investigating and Responding to Allegations of Research Misconduct Policy was introduced in 2014 to ensure a comprehensive and cohesive approach to addressing these issues.
- Both the Public Interest Disclosure (Whistleblowing) Policy and the Investigating and Responding to Allegations of Research Misconduct Policy cross reference each other; advising those who report suspicions of potential research misconduct in line with the relevant policy, that they will not be penalised or suffer detriment by the University and that all associated complaints of victimisation of an individual will be treated seriously and may provide grounds for disciplinary or other appropriate action.
- The University has reviewed and clarified guidelines for the reporting of misconduct of different types by students, and the routes to be taken to investigate and act on the results of any investigation to ensure the different routes for progressing reports are clear and comprehensive.
- Revisions to the University Statutes, (agreed by Privy Council in October 2013) have increased the scope of academic freedom and its protections to cover Research and Teaching staff as well as Academics.

Commitment 2: We are committed to ensuring that research is conducted according to appropriate ethical, legal and professional frameworks, obligations and standards

The Concordat states that employers of researchers are responsible for:

- Having clear policies on ethical approval available to all researchers;
- Making sure that all researchers are aware of and understand policies and processes relating to ethical approval;
- Supporting researchers to reflect best practice in relation to ethical, legal and professional requirements;
- Having appropriate arrangements in place through which researchers can access advice and guidance on ethical, legal and professional obligations and standards.

Actions and activities in place/undertaken in relation to research ethics:

- The University Research Ethics Committee (UREC) is responsible for overseeing the University’s research ethics arrangements and includes representatives from all five UK-based Faculties, the International Faculty, the Professional Services, and the Student’s Union, as well as 4 lay/external members. As of September 2016, the Committee’s membership has expanded to include two co-opted members with relevant expertise (one in relation to research data management, the other in relation to data protection).
- The current version of the Ethics Policy Governing Research Involving Human Participants, Personal Data and Human Tissue (Ethics Policy) has been in place since 2010. The policy is available in full from the University’s central research web pages (http://www.shef.ac.uk/ris/other/gov-ethics/ethicspolicy). The policy states that it is the responsibility of Heads of Department to ensure that staff and students within their department are aware of their requirements under the Ethics Policy. In addition to the Ethics Policy, the UREC has developed a series of Specialist Guidance Papers that provide detailed guidance on specific types of research.
A full review of the Ethics Policy has been underway during the 2015-16 academic year. This review has included detailed consideration of existing sections of the Policy by the UREC and other individuals with key expertise. A University-wide consultation process (involving a discussion event and a general call for comments) took place early in 2016 in order to gain feedback on the existing Policy from the research community; this resulted in a range of alterations to the Policy, including the development of new policy to provide a clear steer on two key issues that many researchers are facing (re-use of existing data, and use of social media data). A second University-wide consultation took place in October 2016 once a first draft of the revised Policy had been prepared, to provide an opportunity for final comments to be considered. The final version will be presented to Senate for approval in December 2016.

The Ethics Policy includes details of the University’s Ethics Review Procedure, a devolved procedure in which each academic department is responsible for administering its own ethics review procedure within the framework set by the Ethics Policy, and supported by the central UREC. The model is based upon several principles including that disciplines know their own fields (and the relevant ethical considerations) the best and that self-regulation results in greater engagement than top-down regulation. Data relating to the ethics decisions made within each department is gathered annually for consideration by the UREC. In addition, each department is required to submit a short update report on an annual basis, to provide details on how they have implemented the ethics review procedure in the past year, to share good practices, and to highlight concerns or support needs. The UREC also visits each academic department every five years; this visit includes an audit of ethics documentation relating to reviews conducted in the department and a discussion regarding the ways in which the department raises awareness of the Ethics Policy. Additionally, any breaches of the Ethics Policy are treated very seriously and are investigated carefully in order for the situation to be addressed appropriately. If awareness of ethics is found to be lacking in a department then the UREC will take appropriate action, e.g. by running a dedicated training workshop.

An online ethics application system has been in place since December 2013, and is now being used by all academic departments. The system holds a complete record of the ethics review process. A review of the system involving a survey of system users took place during the summer of 2016; whilst the overall picture was very positive, this process highlighted some useful areas where the system can be further improved. The University will be working with the system developers to implement appropriate changes over the coming year.

An on-going programme of research ethics workshops has been running for a number of years, facilitated by the UREC, including training for those involved in the Ethics Review Procedure and workshops focussing on particular ethical issues. Ethics reviewer training workshops are now held quarterly to meet demand, as well as an annual good practice-sharing session for Ethics Administrators. In July 2016 a workshop was held on the ethical challenges of undertaking social media research. The event was well-attended and involved lively discussion and debate. A website containing a summary report, presentation slides and other resources has been prepared and promoted so that those not able to attend can benefit; in addition, the outcomes of the workshop have been used to contribute to the development of new policy to support researchers undertaking this kind of research.

The UREC undertakes a range of other activities designed to promote awareness and understanding of ethical issues; for example, Faculty representatives on the UREC are encouraged to facilitate discussions and network building within their Faculties (e.g. by holding regular Faculty-level meetings for those running the ethics procedures).

The UREC has a number of resources to aid departments in their training and awareness raising activities relating to research ethics, including four ethics videos featuring academic staff and students, and template presentation slides to assist departments in providing basic information to staff/students. Further resources are planned for the future, including a simple tool to help researchers establish whether they need ethics approval or other governance requirements, and a short online introductory training programme.
Actions and activities in place/undertaken in relation to legal and professional obligations:

- A Research Governance Procedure for healthcare research has been in place for a number of years: the Procedure involves registering projects on the University’s Research Management System and undertaking checks via an administrative process to ensure that a research governance sponsor is appointed in line with the Department of Health’s Research Governance Framework. Where the University is appointed as the research governance sponsor, additional checks are undertaken to ensure that the appropriate scientific and ethical approvals are obtained prior to the commencement of the project, and monitoring and reporting responsibilities throughout the life of the project are clearly delegated to the Principle Investigator. Work has been undertaken during 2015/16 to provide greater clarity with respect to when this governance process is required, including the development of a straight-forward flow diagram and updates to the central healthcare research governance website: http://www.shef.ac.uk/ris/other/gov-ethics/governance.

- A risk-based quality assurance process is in place for clinical trials sponsored by the University; whilst the University will not sponsor clinical trials of Investigational Medicinal Products, it has defined a number of other types of clinical trial/human interventional study that present potentially higher risk to the participants than other studies. These trials must be risk-assessed and according to the results, an appropriate quality assurance procedure is invoked (e.g. for high risk trials this will involve a visit from the University’s Clinical Trials Assessment Team, including detailed discussions with the Principal Investigator and consideration of key documents from the trial master file).

- A Health and Human-Interventional Studies Research Governance Sub-Committee (HHISRGSC) was set up in 2011 to formally oversee the University’s research governance procedures for research that involves health and human interventions, including the Healthcare Research Governance Procedure and the University’s quality assurance approach for clinical trials. Its remit includes ensuring that external regulations and requirements are met, ensuring the on-going effectiveness of the above mentioned procedures, and making decisions on the findings of any quality assurance activities that require action.

- Two Healthcare Research Governance Information Sessions have taken place in October/November 2016, run by the HHISRGSC (following on from similar popular sessions held the previous year) to provide all those involved in healthcare research with an opportunity to ensure they are fully aware of the relevant governance responsibilities.

- The University has in place an Ethics Policy on the Use of Animals plus a supporting web page (http://www.sheffield.ac.uk/ris/other/gov-ethics/animalethics), setting out its commitment to ensuring that all staff and researchers comply with the relevant national legislative requirements and meet or exceed legal standards for animal husbandry, care and use of animals. Well established structures of ethical review and monitoring are in place in this regard. In April 2015 the University signed up to the Concordat on Openness in Animal Research (www.understandinganimalresearch.org.uk/policy/concordat-openness-animal-research/).

- The University’s Corporate Information and Computing Services (CiCS) supplies a technical infrastructure that supports researchers’ activities. It also provides guidance, training and advice on the use of that infrastructure including delivery of training via the Doctoral Development Programme as well as collaborative work on particular projects and with various research groups. The department undertakes training and guidance relating to Information Security, Information Management and compliance issues such as Data Protection. The department is expanding its support for University research activity by instituting a formal Research IT Service which was approved by UEB in January 2015 and is expected to be established by early 2016. CiCS is also part of a joint venture with Library Services and Research & Innovation Services on the provision of support for Research Data Management via the Research Data Management (RDM) Steering Group, chaired by Professor Robert Freckleton. Governance of CiCS research support and its alignment with University objectives in this area is via a number of routes including:

1. Representation on Research and Innovation Committee and the Capital Research Assets Group;

2. Strategic and Operational Liaison with Faculties and other Professional Services departments;
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3. The CiCS Research and Innovation Service Advisory Group (R&I SAG) which has cross faculty representation including Professional Services;

4. Specific liaison with the Research Computing community via the Research Computing Advisory Group (which in turn reports to the R&I SAG, as does the RDM Steering Group).

- A list of the services CiCS provides relating to support for researchers is available on the following web pages: http://www.sheffield.ac.uk/cics/research. Additionally there are also guidance on the CiCS activities relating to Information Security (http://www.sheffield.ac.uk/cics/security), Data Protection compliance (http://www.sheffield.ac.uk/cics/dataprotection) and Information and Records Management http://www.sheffield.ac.uk/cics/records.

**Commitment 3: We are committed to 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**

The Concordat states that employers of researchers are responsible for:

- Embedding these features in their own systems, processes and practices;
- Working towards reflecting recognised best practice in their own systems, processes and practices;
- Implementing the Concordat within their research environment.

The actions and activities outlined in relation to Commitment 1 also address this Commitment.

Additional substantial actions:

- A research project has recently been undertaken to investigate the factors that combine to create a healthy and competitive research environment, i.e. one that is both productive and which upholds the highest standards in research. This has involved discussions with research leaders from across the University; the results have now been collated and an interactive web tool is being developed to showcase the good practices that can be used by research leaders in helping them to foster a healthy and competitive research environment. This will be promoted across the University within 2016/17.

The Concordat also recommends that employers of researchers identify a senior member of staff to oversee research integrity and to act as first point of contact for anyone wanting more information on matters of research integrity. The University has agreed that the Pro-Vice-Chancellor for Research and Innovation and Chair of the University's Research and Innovation Committee has overarching responsibility for the University's approach to fostering high standards of good research practice throughout the University's research community. This role has recently been taken on by Professor David Petley. Collectively the Committee’s members are responsible for keeping under review and supporting the implementation of the University's approach within the Faculties. However, for practical purposes, the first point of contact for receiving enquiries on matters concerning good research practice (e.g. what constitutes good practice, what constitutes unacceptable practice, and information on existing support resources) is Mr Richard Hudson, Head of Researcher Environment in Research and Innovation Services.

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

The Concordat states that employers of researchers:

- Have primary responsibility for investigating allegations of misconduct:
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- Should ensure that any person involved in investigating such allegations has the appropriate knowledge, skills, experience and authority to do so;

- Have responsibility for ensure that appropriate steps are taken to remedy any situations arising from an investigation.

It also states that employers of researchers should, as part of existing mechanisms and conditions of grant:

- Have clear, well-articulated and confidential mechanisms for reporting allegations of research misconduct;

- Have robust, transparent and fair processes for dealing with allegations of misconduct that reflect best practice;

- Ensure that all researchers are made aware of the relevant contacts and procedures for making allegations;

- Act with no detriment to whistleblowers making allegations of misconduct in good faith;

- Provide information on investigations of misconduct to funders of research and/or statutory bodies as required by their conditions of grant and other legal, professional and statutory obligations;

- Support their researchers in providing appropriate information to professional and/or statutory bodies.

Finally, the Concordat states that employers of researchers should provide a named point of contact or recognise an appropriate third party to act as confidential liaison for whistleblowers or any other person wishing to raise concerns about the integrity of research being conducted under their auspices.

Details of the University of Sheffield’s procedures for reporting and dealing with allegations of misconduct, are provided to all staff and students via the University’s website and within the Good Research & Innovation Practices policy. Further information is provided below, and in response to Commitment 1.

Comments in relation to staff research:
The University of Sheffield has a procedure for investigating and responding to allegations of research misconduct, which was reviewed in Autumn 2014 to ensure compliance with the UK Concordat’s expectations.

The review, led by Human Resources, was undertaken in close liaison with the Pro-Vice Chancellor for Research & Innovation, and colleagues within Research & Innovation Services. It involved seeking input from the key internal and external stakeholders including Faculty Directors of Research & Innovation, The UK Research Integrity Office (UKRIO – an independent charity), the University’s Research & Innovation Committee and Trade Union representatives, as well as taking into consideration the useful resources identified with Annexe II of the Concordat. The revised policy and procedure has now been in place for several months and supporting guidance and information has been made available. Feedback on the new process has been positive.

For the academic session of 2015/16 there was one case that progressed to formal investigation under this policy and procedure, listed in Appendix 1.

Comments in relation to student research:
The University’s regulatory framework underpins the University’s expectations of the conduct of its students. Depending on the nature of the research misconduct, action may be taken under the University’s Regulations as to the Discipline of Students; General Regulations as to Progress of Students; and the General Regulations relating to Student Fitness to Practice.

For the academic session of 2015/16 there were four formal actions taken in accordance with the above Regulations, listed in Appendix 2.
The University’s Regulations relating to Intellectual Property, Regulations on the Use of Computing Facilities and Regulations relating to the Library may also be of relevance.

Where a student may have concerns about research misconduct on the part of a member of staff, the University’s ‘Investigating and responding to allegations of research misconduct’ policy is the appropriate mechanism for the raising of concerns.

For the academic session of 2015/16 there were no complaints received from students to include alleged research misconduct considered at the formal Faculty and case review stages of the University’s Students Complaints Procedure.

**Commitment 5: We are committed to working together to strengthen the integrity of research and to reviewing progress regularly and openly.**

The Concordat states that it is important for the steps taken by employers of researchers to ensure that their environment promotes and nurtures a commitment to research integrity are communicated effectively, and that the same standards apply to all. The Concordat therefore recommends that employers of researchers should present a short annual statement to their own governing body.

As mentioned in the introduction to this paper, this document constitutes the University’s annual statement for the 2015/16 academic year, to be presented to Council at its meeting in November 2016.

Research & Innovation Services
Human Resources
Student Services
Corporate Information and Computing Services
### Appendix 1: Summary of Formal Investigations into allegations of Research Misconduct by Staff (for the Academic Session: 2015/16)

<table>
<thead>
<tr>
<th>No.</th>
<th>Issue type subject to formal investigation</th>
<th>Date of receipt of formal allegation</th>
<th>Outcome</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td>Potential falsification or fabrication</td>
<td>Jan 2016</td>
<td>Not upheld</td>
</tr>
</tbody>
</table>
Appendix 2: Summary of research misconduct alleged on the part of students reported in 2015-16 under the University’s Regulations as to the Discipline of Students; General Regulations as to Progress of Students; and the General Regulations relating to Student Fitness to Practice.

<table>
<thead>
<tr>
<th>No.</th>
<th>Nature of Research Misconduct</th>
<th>Outcome</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td>Fabrication</td>
<td>Not concluded investigation/pending</td>
</tr>
<tr>
<td>2.</td>
<td>Plagiarism</td>
<td>Upheld</td>
</tr>
<tr>
<td>3.</td>
<td>Plagiarism</td>
<td>Upheld</td>
</tr>
<tr>
<td>4.</td>
<td>Plagiarism</td>
<td>Not concluded investigation/pending</td>
</tr>
</tbody>
</table>