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*[1] (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 Services on behalf of the Research & Innovation Committee, in consultation with HR, Student Support Services, The University Library, CiCS and the Named Information Officer. This is the fifth iteration of this statement since the above requirement was introduced. The statement will be made publicly available as required by the Concordat, on the University's central Research Ethics and Integrity website:
https://www.sheffield.ac.uk/rs/ethicsandintegrity/index

**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

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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

students were consulted before the final version was published. The policy includes three sections: (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 (https://www.sheffield.ac.uk/rs/ethicsandintegrity/index).

- 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 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.

- The University has purchased 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. An updated version of the online course was made available in 2016 for Faculties to use within their postgraduate research student research integrity training. This version includes an in-built test that enables 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. This enhanced version of the online course is also promoted to staff and students across the University in a variety of ways, including to all new staff in their induction pack, and being made available to all staff and students on the University's central ethics and integrity webpages.

- Other centrally-run workshops for staff and/or students are held on a needs basis, addressing relevant topical research integrity issues including Information Security, Research Data Management, licensing and Copyright. In May 2017 the University held a workshop for staff and research students focusing on the ethics and integrity risks and challenges when undertaking research in developing countries. This formed part of a package of support for those interested in applying for, or in receipt of, funding from the new Global Challenges Research Fund (or other similar schemes). The event involved talks from internal and external speakers with relevant expertise, as well as discussion activities which have contributed to the development of a webpage containing a range of resources accessible to all staff and students. This includes a report of the event, video of the presentations, a guidance checklist for researchers undertaking research in developing countries (currently being developed into a leaflet format). A postgraduate student-led event was also supported by the University on the ethics and integrity challenges of undertaking fieldwork in China, and web resources have been made available.

- A research project was completed in 2015/16 that aimed to investigate the factors that combine to create an effective research environment, i.e. one that is both productive and which upholds the highest standards in research. A web tool has been developed to showcase the findings in an interactive and engaging way, and this has been promoted to the Faculties' senior research leaders and HR Managers during 2016/17, with a view to them building this resource into induction and development processes for heads of department and directors of research. The findings have also been shared internationally via a poster presentation at the World Conference on Research Integrity in May 2017.

- A fact-finding exercise has been underway during the Autumn of 2017 at the request of the University's Research & Innovation Committee, involving discussions at Faculty Research & Innovation Committee meetings, to find out more about how departments ensure staff and students are aware of, and follow,

professional standards of integrity, to better understand the challenges and relevant terminology at a disciplinary level, and to find out what departments would value in terms of support. A report on the outcomes of this process are due to be discussed at a cross-faculty meeting on 13 November, and this inform the University's strategy for ensuring a culture of research integrity going forward.

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 advise 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, and 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 December 2016. The policy is available in full from the University's central research web pages (https://www.sheffield.ac.uk/rs/ethicsandintegrity/ethicspolicy/general-principles/homepage). 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 took place during the 2015-16 academic year, resulting in a range of alterations, including the development of new policy to provide a clear steer on two key issues that many researchers are now facing (re-use of existing data, and use of social media data).
- 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 used by all academic departments. The system holds a complete record of the ethics review process. The University will be working with the system developers to implement two key developments to the system during 2017/18: a short self-declaration process for researchers who will only be using existing, anonymised data in their research, and an automated process for managing amendments to existing approved applications.
- 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 were held quarterly during 2016/17. In May 2017, a workshop was held on the ethics and integrity challenges of undertaking research in developing countries, as mentioned earlier in this report.
- 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 and supported to facilitate discussions and network building within their Faculties (e.g. by holding regular Faculty-level meetings for those with responsibility for running the ethics procedures).
- The UREC provides a number of online resources to aid departments in their training and awareness raising activities relating to research ethics, including a range of ethics case studies, and template presentation slides to assist departments in providing basic information to staff/students. A short online introductory training video, covering the basics of research ethics and applying for ethics approval, is under development.

Actions and activities in place/undertaken in relation to legal and professional obligations:
- A range of work is underway across the University to address the requirements of the forthcoming EU General Data Protection Regulation, including revising relevant policies and guidance, developing relevant support, and putting plans in place for ensuring the requirements are communicated across the research community.
- 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 Costing Tool and undertaking checks via an administrative process to ensure that a research governance sponsor is appointed in line with the UK policy framework for health and social care research. 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 2016/17 to develop a simple online tool to help

researchers   establish   when   research   governance   is   required:
https://www.sheffield.ac.uk/rs/ethicsandintegrity/governance/decision_tree/index.

- 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.

- A Healthcare Research Governance Information Session took place in November 2017, run by the HHISRGSC (following on from similar popular sessions held in 2015 and 2016), to provide all those involved in healthcare research will an opportunity to ensure they are fully aware of the relevant governance responsibilities. This included a summary of the recently published UK policy framework for health and social care (plans are also in place to ensure that the requirements of the new policy are communicated as appropriate across the University, and that processes and guidance are updated accordingly).

- The University has in place an Ethics Policy on the Use of Animals plus a supporting web page (https://www.sheffield.ac.uk/rs/ethicsandintegrity/animal-research) 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. Through our Animal Welfare and Ethical Review Board (AWERB) we have well established structures of ethical review and monitoring in place. 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 2018. A number of additional posts have been recruited or are in the process of recruitment including specialists on research data storage, research computing and research information governance as well as a head of service. CiCS has launched a new Research Storage service which provides secure and accessible storage for research groups with 10 Terabytes available for each group free of charge at the point of use.

- CiCS is also part of a joint venture with The University Library and Research Services on the provision of support for Research Data Management, overseen by the Open Access Advisory Group, chaired by Professor John Derrick, Deputy Pro-Vice- Chancellor for Research and Innovation and co-chaired by Tracey Clarke from The University Library. The University Library and CiCS launched a new service in early 2017, Online Research Data at Sheffield (ORDA), to provide an on-line repository for research data linked to published research. 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;

> 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).
>
> 5. Specific workstreams to manage work relating to research information systems and research administration systems in conjunction with The University Library and Research Services respectively.
>
> 6. UEB has recently establised a new group, the UEB IT Subgroup to oversee the work of CiCS. It is chaired by the Deputy Vice Chancellor and its membership includes the Vice-President for Research & Innovation.

- 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. The research storage service information is at: https://www.sheffield.ac.uk/cics/research-storage, and ORDA is at: https://orda.shef.ac.uk/. Additionally there is 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.
- Services provided by the University Library can be found at http://www.sheffield.ac.uk/library/research, including information on management of research data http://www.sheffield.ac.uk/library/rdm

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.

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 Vice-President 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 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 Lindsay Unwin, Ethics and Integrity Officer, Research Services.

The University Library is engaged on multiple levels in supporting the University's research environment and works in close partnership with Professional Services colleagues to secure effective service delivery. It provides infrastructure and tools to support excellent research management and to enable research outputs to be widely discoverable, accessible to all and preserved for the long term. This includes

stewardship of the institutional open access repositories for publications and data: White Rose Research Online (WRRO), White Rose ETheses Online (WREO), Online Research Data (ORDA) and a preservation system ArchiveUS. These systems are integrated with researcher workflows and central University research infrastructure to allow seamless capture of data.

The Library is active in the sector nationally and internationally, working closely with peer research libraries, vendors and publishers to ensure the University is well positioned to take advantage of developments in the scholarly communications field. The Library coordinates the governance of these activities through the University-wide Open Access Advisory Group. The Library provides a range of advisory and guidance services for staff and students, utilising the skills and experience of specialist staff covering specialist systems, scholarly communications, publishing, licensing and copyright. Most recently two specialist roles in copyright and licensing have been created, in response to the increasing demands on modern researchers in public engagement and industry partnerships.

Students are supported through a wide variety of sessions provided through the Doctoral Development Programme and Doctoral Training Centre events with supporting digital materials. The Library engages in awareness raising activities and skills development pertaining to excellent research management for researchers throughout the spectrum and has recently delivered several successful Data Carpentry sessions. Environmental scanning and advocacy around the changing landscape is an ongoing role for the Library to ensure the University is able to meet current and future needs pertaining to research integrity and the transparency of our research outputs.

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;
- 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.

<u>Comments in relation to staff research:</u>
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 then Pro-Vice Chancellor for Research & Innovation, and colleagues within Research & Innovation Services (now Research 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.

For the academic session of 2016/17 there were no cases that progressed to formal investigation under this policy and procedure.

<u>Comments in relation to student research:</u>
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 2016/17 there were 5 formal actions taken in accordance with the above Regulations, listed in Appendix 1.

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 2016/17 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 2016/17 academic year, to be presented to Council at its meeting in November 2017.

Research Services
Human Resources
Student Support Services
Corporate Information and Computing Services
The University Library

Appendix 1: Summary of research misconduct alleged on the part of students reported in 2016-17 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.

No.	Nature of Research Misconduct	Outcome
1.	Plagiarism	Penalties issued
2.	Fabrication	Penalties issued
3.	Behavioural	Expulsion
4.	Behavioural	No action taken
5.	Behavioural	Suspended