

Council Reading Room: Full Statement to be published on University website

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, and was last updated in 2019 (to add a specific section relating to clinical trials transparency). 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>).
- Mandatory training for all postgraduate research 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 training is currently undergoing a review process to ensure that it remains fit for purpose, as part of a wider review of doctoral training provision.

- 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. The course includes an in-built test that enables leaders of the Faculty-run training for postgraduate research students 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 course and self-assessment exercise are promoted to staff and students across the University in a variety of ways, including to all new academic/research 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. The University Research Ethics Committee (UREC) provides regular training sessions for those who undertake the review of ethics applications, and also offers workshops addressing key ethical challenges (e.g. in July 2019 a session was held on the ethical implications of using social media data for research).
- The UREC offers an annual funding opportunity to encourage staff and PGR students to develop and run their own training events, workshops or symposia, or to develop training and discussion materials, to address particular topics relating to research ethics or integrity. During 2018/19, five staff-led projects and two PGR student-led projects were successful in receiving funding. The resulting workshops/events/resources have covered a wide range of issues from reproducibility to the ethical challenges of undertaking research in the Global South. All have been well-received, and beneficial in supporting the dialogue and discussion of challenging ethics and integrity issues, and in building communities of practice/networks within and across particular disciplinary areas.
- Work has been underway during 2018/19 to implement the recommendations of a working group tasked with considering how to ensure there is a strong and consistent message to staff and students involved in research about the importance of effective data management. A key recommendation was the introduction of a compulsory requirement for postgraduate research students to develop Data Management Plans, and this has been put in place for new students from the start of the 2019/20 academic year, with the University Library providing support to the Faculties in developing template DMPs and using DMPOnline. Work is also underway to update and enhance the University's Research Data Management Policy (a key section of the GRIP policy).
- A new interactive online tool designed to clarify the processes by which staff and students can raise concerns relating to research integrity/research misconduct was developed and communicated across the University at the start of the 2019/20 academic year.

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

- As part of the induction process a staff induction portal signposts 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).
- The Investigating and Responding to Allegations of Research Misconduct Policy was introduced in 2014, and seeks to ensure a comprehensive and cohesive approach to addressing these issues; the Policy has been kept under review and appropriate updates made when required (e.g. in response to changes to funder requirements for reporting of research misconduct cases).
- 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 operates an institutional level Code of Ethics, which provides an overarching framework within which distinct policies and procedures sit, including research ethics and Whistleblowing.
- 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 currently one co-opted member (the University's Data Protection Officer).
- The University's Ethics Policy Governing Research Involving Human Participants, Personal Data and Human Tissue (Ethics 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 number of updates to the Ethics Policy and related guidance have been made during 2019, such as the inclusion of more specific expectations within the Ethics Policy concerning the training of those who undertake the ethical review of research projects involving human participants or personal data (in response to an internal audit of the University's ethics arrangements during 2018/19), and the development of a new guidance paper on managing the potential risks to the researcher when carrying out emotionally demanding research.
- 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 has been working with the system developers to implement two key developments to the system during 2018/19: 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. Four ethics reviewer training workshops were held during 2018/19 (three for internal reviewers, and one for external reviewers). An information session was held in September 2018 for Professional Services staff on the ethical issues relating to administrative research. A workshop open to all staff and PGR students was also held in July 2019 on the ethical issues relating to using social media data for 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 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.
- During 2018/19, the UREC offered funding to small projects designed to promote research ethics and integrity, as mentioned under Commitment 1.

Actions and activities in place/undertaken in relation to legal and professional obligations:

- Work has continued across the University during 2018/19 to ensure that the requirements of the GDPR and Data Protection Act 2018 are met, including further revisions to ethics guidance and reminder communications from the UREC to departments to ensure that new data protection requirements are being followed.
- The University has a policy and process for managing security sensitive research, as part of the University's Prevent duty (the UK Counter-Terrorism and Security Act 2015's requirement for Universities to 'have due regard to the need to prevent people from being drawn into terrorism'). The aims of the policy are to ensure the welfare of staff and, in particular, students who undertake security sensitive research, recognising the potentially radicalising and/or distressing effects of viewing security-sensitive material; and to protect staff and students undertaking legitimate research from misinterpretation by the authorities (which may result in legal sanction), so that research may proceed unhindered. The policy and associated process are based on a traffic-light system to assess the level of risk that the proposed research presents, and to identify the appropriate steps that should be undertaken to manage the risk.
- A Research Governance Procedure for health and social care 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 governance 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 and Head of Department.

An online tool is available to help researchers establish when research governance is required for a project:

https://www.sheffield.ac.uk/rs/ethicsandintegrity/governance/decision_tree/index. A number of updates to this procedure have been implemented during 2018/19. These have included the introduction of additional checks to ensure the requirements of the University's new clinical trials transparency policy are met. They have also included the introduction of a requirement for each University-sponsored project to have a designated 'Study Governance Administrator' to take day-to-day responsibility for ensuring governance requirements are met (with regular information sessions being offered to those who take on this role).

- A risk-based quality assurance process is in place for human-interventional studies 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 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 Research Governance Sub-Committee (RGSC), supported by Research Services, formally oversees the University's research governance procedures for research that involves health and social care, including the Research Governance Procedure and the University's quality assurance approach for human interventional studies. 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 Research Governance Information Session took place in November 2018, run by the RGSC (following on from similar popular sessions held in previous years), to provide all those involved in health and social care 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 (updated in June 2019) 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 the Animal Welfare and Ethical Review Board (AWERB) the University has 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/).
- Provision of support for Research Data Management is jointly provided by the University Library, CiCS, and Research Services. This is overseen by the Open Access Advisory Group, chaired by Professor John Derrick (Acting Vice-President and Head of the Faculty of Science), and co-chaired by Anne Horn, (Director of Library Services and University Librarian). 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, especially that which supports published research. ORDA is at: <https://orda.shf.ac.uk/>.
- Comprehensive information and guidance on management of research data is provided by the University Library at: <http://www.sheffield.ac.uk/library/rdm>. A range of other research support services provided by the University Library can be found at: <http://www.sheffield.ac.uk/library/research>.
- CiCS supplies a technical infrastructure that supports researchers' activities (<https://www.sheffield.ac.uk/cics/research>). 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 and compliance issues. The department has recently expanded its support for University research activity with the appointment of the Assistant Director - Research IT and the

development of a Research IT strategy. 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. 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. The University has a Cyber Essentials certified suite of research IT services that helps ensure the security of research activities. 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).
 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 established a 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 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>.
 - The University's Information Management Group has published policy and guidance on a range of information management issues, see www.sheffield.ac.uk/govern/

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 & 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 by Professor David Petley during 2018/19. 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, Research Ethics and Integrity Manager, Research Services.

The University signed the San Francisco Declaration on Research Assessment (DORA) in November 2018, committing the University to transparency around criteria used for the recruitment and promotion of researchers and to evaluate research outputs on their own merits rather than the venue in which they are published.

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.

The University Library is now an institutional subscriber to DMPOnline, an online tool developed by the Digital Curation Centre to facilitate the creation and editing of data management plans by researchers. The Library has developed extensive customised guidance that resides within the DMPOnline tool and is instantly accessible to researchers when answering relevant questions for their funders' requirements. The Library regularly updates the guidance contained within DMPOnline, so researchers always have access to the most recent policy and resource developments.

The University 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 University Library coordinates the governance of these activities through the University-wide Open Access Advisory Group. The University 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.

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 University 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.

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 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.

This procedure has subsequently been updated as needed (e.g. to ensure compliance with funder reporting requirements).

For the academic session of 2018/19 there were three cases that were investigated under the Preliminary phase of the process (Stage 1) (one of these was continued from 2017/18). Two cases have progressed to a formal (Stage 2) investigation; both are still on-going at the time of writing. These cases are listed in Appendix 1. In two further cases, initial assessment of the matter resulted in a decision not to proceed to formal investigation under the research misconduct procedure (on account of the allegation being insufficiently substantiated).

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 2018/19 there were 5 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 2018/19 there was one complaint received from a student that included an element of alleged research misconduct, in respect of duty of care/supervisory support, although research misconduct was not the primary element of the complaint. This was considered at the formal Faculty review stage of the University's Students Complaints Procedure, and was upheld.

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 2018/19 academic year, to be presented to Council at its meeting in November 2019.

Research Services
Human Resources
Corporate Information and Computing Services
Student Support Services
The University Library
The University Secretary's Office
The Named Information Officer

Appendix 1: Summary of Formal Investigations into allegations of Research Misconduct by Staff (for the Academic Session: 2018/19)

No.	Issue type subject to investigation	Stage of investigation	Date of receipt of formal allegation	Outcome
1.	Plagiarism/misrepresentation (authorship)	Preliminary – Stage 1	June 2018 (continued from 2017/18; also reported in 2018 statement)	Not upheld
2.	Plagiarism/misrepresentation (authorship)	Formal investigation – Stage 2	October 2018	On-going
3.	Misrepresentation and breach of duty of care	Formal investigation – Stage 2	March 2019	On-going

Appendix 2: Summary of research misconduct alleged on the part of students reported in 2018-19 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	Upheld
2.	Plagiarism	Upheld
3.	Plagiarism	Upheld
4.	Plagiarism	Upheld
5.	Plagiarism	Upheld