

## **Narrative Statement of the University of Portsmouth's Compliance with the UUK Concordat to Support Research Integrity covering September 2020 to August 2021**

The University of Portsmouth 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 appropriate interventions where standards are not fully met. A summary of the actions and activities undertaken by the University in meeting the requirements of the Concordat to Support Research Integrity (taking into account the October 2019 update) are outlined below within each of its five Commitments.

### **COVID-19**

In some disciplines research has been significantly disrupted over the last two years due to the COVID-19 pandemic, with face to face research and data collection temporarily suspended in March 2020 and only gradually becoming viable again. However, since the initial suspension extensive guidance (and a check list) have been created detailing requirements for the risk assessment of research activities. These procedures align with government advice, conditions laid down by the University insurers, and were written with the input of the University Ethics Advisor.

In addition to all new project being designed in line with the COVID-19 procedures, adaptations to research design for ongoing projects are being considered routinely by the faculty ethics committees as amendments. Where COVID-19 focussed projects developed in line with national priorities have been initiated, their review has been in accordance with normal ethics and governance procedures albeit working to reduced timelines. Throughout this challenging period the University has been committed to upholding the normal high standards of research integrity.

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

The University continues to adopt the United Kingdom Research Integrity Office's (UKRIO) Code of Practice for Research as its own. Any breach of this code is dealt with following our 2013 Procedure for the Investigation of Allegations of Misconduct in Research.

#### Research ethics and governance

The University Ethics Policy (updated April 2020) requires an ethics review of all research undertaken by University staff and students. Reviews are proportionate to the type of research and the potential for raising ethical issues. This is achieved through a combination of i) an online review tool, ii) reviewed at departmental level, iii) review by faculty ethics committees, and iv) review by national committees such as NHS RECs or MODREC. Guidance is provided to help researchers determine which type of review is required. The ethics system is co-ordinated by an ethics advisor who is familiar with national and international research ethics requirements and sits on the National Research Ethics Advisors Panel. Guidance is continually evolving based upon feedback from applicants and the changing legal and policy landscape. These processes received a routine, external, audit in Spring

2021 and were found to be in accordance with sector best practice. A number of actions were highlighted that are being addressed.

The University has research governance and ethics webpages that provide guidance for its research community as well as links to policies on research conduct. We publish a one page checklist of research governance responsibilities that is promulgated throughout our research community via the Research and Innovation Services blog, various researcher networks, training days, and ensuring all new staff receive copies of the appropriate information at their formal induction.

### Research Environment

Research and Innovation Services (RIS) manages an internal, University-wide, Peer Review College (PRC) and pre-submission peer review has been fully incorporated into our research grant application approval, in line with best practice elsewhere in the sector. This is a necessary response to 'demand management' requirements being placed on HEIs by the major research funders in the UK but is also an essential feature of any quality research culture. The PRC has reviewed over 500 applications since its launch in May 2013. The aim of internal Peer Review is to ensure that all bids reaching certain external bodies, where the application is led by and is submitted by researchers employed by the University, meet all necessary quality thresholds. The University regularly updates its PRC process in light of best practice operating at other institutions. For example, a recent addition to the PRC process is that the Research Data Officer reviews all Data Management Plans prior to submission to external research funding bodies. The PRC coordinator provides an annual report to Research and Innovation Services Senior Management for them to discuss further with University Research Managers when required, which includes an assessment of PRC operations and recommendations for future PRC development.

The University uses Pure, a Central Research Information System (CRIS), to provide a secure and stable platform to both manage our research data and share our research with the wider world. Pure includes an online archive in which academics' research data can be stored and, as appropriate, shared publicly. With regards to making research publications open access, we have processes in place to ensure that academics' publications are made open access in accordance with publishers' copyright policies. We have a permanent Research Outputs team working within the Library whose responsibility it is to manage and oversee all aspects of open access. All publications are validated by this team for accuracy and completeness when they are uploaded onto Pure. We have made excellent progress towards complying with both Research England and other funders' (e.g. RCUK) open access policies. The team provides faculties with weekly reports on what's missing from Pure, and they conduct a university-wide audit annually. Due to these processes, the University now has 97% of journal and conference articles compliant with Research England's open access policy, which means that they're in Pure and available to the public on our research portal website.

The University's Corporate Health and Safety Team continues to support research by developing and implementing policies, arrangements and procedures that ensure the safety and well-being of researchers and participants and the reputation of the University. Equally

the Corporate Health and Safety Team ensures statutory and best practice compliance in relation to health and safety legislation. To assist with compliance and implementation of policies and arrangements, the Corporate Health and Safety Team provides comprehensive training, instruction and information to faculties and has representatives on all of the University's ethics committees. The University also recognises the importance of protecting research samples, products and artefacts from physical damage caused by adverse events and is considered through the risk assessment process.

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

The University's research governance structure is broadly aligned with the Association for Research Ethics' Framework of Policies and Procedures for University Research Ethics Committees. The University is also a subscriber to the UK Research Integrity Office (UKRIO). We are therefore confident that our governance framework is similar to those of other HEIs. The Pro Vice- Chancellor, Research and Innovation, is the formal contact point for all research integrity matters and is publicly listed as the University's research integrity lead on the UKRIO website as well as the University's website.

The University Ethics Committee (UEC) is concerned with matters of policy, procedure and strategy. Faculty Ethics Committees (FEthCs) are responsible for overseeing the ethics review of specific projects and have common Terms of Reference and procedures. A Research Ethics Subcommittee is made up of the FEthC chairs from each faculty along with other representatives as necessary. It ensures consistency in the application of central policies and procedures, supports the development of new procedures, hears appeals from researchers (there have been none in 2020/21), and ensures that the University meets essential requirements for RCUK quality assurance purposes. The University Ethics Advisor is a member of each of the FEthCs and also chairs the Research Ethics Subcommittee.

The University currently enjoys a good reputation with the Health Research Authority and its ethics service with a number of staff directly involved with the HRA and other external ethics committees. The University Ethics Adviser is a Chair of an NHS REC and offers support to staff and research students completing NHS applications for ethics review. In the absence of a Human Tissue license, applications are regularly made to the NHS to grant approval for research involving the storage of human tissue with further guidance available to researchers via the research ethics website. Additional advice to all staff seeking NHS research passports is provided through the University's HR web pages.

We have a research support website that provides guidance for staff regarding what constitutes a conflict of interest in research, and the requirement to declare interests according to the University's Declaration of Interests Policy 2016 is also flagged by research finance forms at the post award stage. The research support website also signposts the RCUK 2010 Concordat for Engaging the Public in Research and Research Finance documentation also flags this as appropriate to those in receipt of RCUK funding.

Data management

The University's Data Management Policy complies with research funder requirements and aligns with UKRI research data policies. While this policy states that research data needs to be made open access wherever possible, first and foremost it states that academics must operate within the "Regulatory Environment". This includes respecting all applicable legislation (e.g. GDPR and Data Protection Act 2018, etc.), contractual or funder obligations, and ethical and policy requirements. The University's Retention Schedule highlights best practice for the retention of Project Records, including those pertaining to Research and Innovation Projects. The University also holds CyberEssentials plus certification.

The University's Research Outputs Team, who are based in the Library, are tasked with the coordinating the management of research data, including ensuring that academics comply with these requirements and standards. Within this team, the Research Outputs manager oversees the work, while the Research Data Officer provides practical and continuous support. Both roles are full-time permanent posts. This involves supporting academics to develop data management plans (DMPs), and assisting them in managing their research data throughout their projects and making research data (wherever possible) open access at the end of the project. This role also involves providing expert advice on a range of areas including storage solutions, appropriate file types for long-term preservation, security, licensing and the most suitable archive in which to preserve the research data. This advice includes providing workshops, online training, one-to-one guidance and extensive online support, which has been updated this year. For example, this year the Research Outputs Team have developed custom online DMP templates for both staff and students. Crucially, the linkage is in place between the ethical review process and research data management; all researchers going through the ethical review process are directed to seek advice about research data management as part of this process.

The University is registered with the ICO (registration number Z7027819) as a data controller for the personal data it processes, including in relation to research projects. Researchers continue to abide by the requirements of the data protection legislation and seek advice from relevant sources within the University – the University's Ethics Adviser, the Research Outputs Manager, the University's Data Protection Officer, and staff on Faculty Ethics committees – when questions arise.

Following a decision by the EU Commission on 28 June 2021 to grant a decision of adequacy for the UK data protection regime all research contracts involving personal data processing between the UK and the EEA can continue as if the UK had not left the EU,. The EU has also issued renewed Standard Contractual Clauses that can be used to legitimise personal data processing in contracts with international organisations, particularly to replace the EU-US Privacy Shield. However, the UK's Information Commissioner's Office (ICO) is set to issue Standard Contractual Clauses based solely on UK legislation later in 2021 which will be used in preference to the EU clauses if required.

### Animal Research

Whenever possible, our research uses alternative methods, such as cells grown in the laboratory and computer models, however there is still some research involving animals

that remains essential. The University has an Animal Welfare and Ethical Review Body (AWERB) as a requirement under the Animals (Scientific Procedures) Act 1986. This is the legislation that allows us to do experiments on protected animals. Protected animals are those that have a backbone and members of the cuttlefish/squid/octopus family. The University has an Establishment License and PIs in the Institute for Biomedical and Biological Science (IBBS) hold 8 project licenses for work focused on diseases and basic biology in mice, fish and frogs. The day-to-day care of the animals is overseen by our named animal care and welfare officers (NACWOs). We have three, each being responsible for either mammals (we only hold mice and a few guinea pigs), frogs or fish and they work closely with our named veterinary surgeon (NVS). In total there are some 27 projects running at the University that involve animals, all have been approved by the AWERB.

**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**

Over the last five years the University has undergone transformational change, with the launch of the new University Vision 2030 and Strategy 2025. These documents reaffirm the institution's commitment to develop and support its researchers and specifically commit the institution to "promote opportunities and develop skills for early and mid-career researchers", "nurture our postgraduate researchers to become the next generation of research and innovation leaders" and to "provide an infrastructure that improves the capacity and capability of our researchers". In addition, the University signed up to the new Concordat to Support Career Development of Researchers in September 2019 and has successfully retained the HR Excellence in Research Award. The published action plan for 2021-2023 was developed through the Researcher Development Group (previously Concordat Implementation Group), through liaison with the researcher community and through feedback surveys including those received through CEDARS 2021. The action plan identifies 5 priority areas that include induction, appraisal and support for career development of researchers.

The Research and Innovation Staff Development Programme (RISDP) is targeted to research staff and academic staff but is open to all staff in the University. Existing workshops and seminars for researchers seeking new funding sources and collaborative networks provide an overview of Research Integrity issues and researcher obligations as outlined in the Concordat. This practice helps us to embed a culture of integrity. Specific Research Ethics and Integrity workshops have been available for all staff, and Good Clinical Practice workshops are delivered in association with Portsmouth Hospitals Trust. In addition to the RISDP programme research staff sign up to attend coaching or the Researcher' Network events. Staff with a broad range of job roles including teaching fellows, technical specialists, scientific officers and librarians have also attended workshops to develop research skills. The University has a Researchers Network to help make researchers aware of their individual responsibilities. A network lunch is held each term with events designed to support researchers in connecting and learning from each other, and support them in reaching out to build skills and take responsibility for their own development and career

choices. Research staff also have access to mentoring using an institution-wide online, mentor matching system.

Responsibility for ethics and impact has been promoted via online ethics resources and in promulgating the requirement for ethics review. A wide range of research related forms and documents are constantly being updated and modified to emphasise researcher responsibilities as defined in the Concordat to Support Research Integrity. The Research Integrity Information Leaflet is disseminated to all new postgraduate students at the point of induction, as well as to new researchers at the University staff induction. No student can submit a thesis without evidence of ethics review and a completed declaration modelled on the UKRIO Code of Practice for Research.

The Graduate School Development Programme (GSDP) offers broad-based generic skills training with over 100 workshops and special interest groups on a wide range of topics including research design, doctoral process and career development. There is a mandatory research ethics and integrity workshop for all first year research students. Workshops are delivered by expert tutors from across the University and support students at all stages of their research degree. They offer face-to-face workshops and special interest groups, alongside e-learning resources to help PGR students to extend their knowledge and skills as a researcher. The GSDP has been developed to complement the subject-specific and advanced training available from faculties, departments or research groups, and provides some of the 10 days a year of research development required by the Research Councils UK (RCUK) for research students (five days for part-time students). The Graduate School's Research Supervision Events include introductory sessions, best practice workshops and topics of advanced or specialist interest. All supervisors who are new to supervising research degree students at Portsmouth are required to attend the Introductory Workshop for Research Supervisors before they can be confirmed on the research supervision team. The workshops provide an overview of the processes involved in managing a research degree student at Portsmouth as well as providing opportunities to discuss the 'art' of supervision with experienced supervisors. These workshops take place twice a year.

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

There are established policies and procedures in place for the investigation of both alleged financial and research misconduct. The University has a Procedure for the investigation of Allegations of Misconduct in Research (September 2013, the policy is currently subject to review). This procedure provides a clear mechanism to report allegations of alleged misconduct and robust, fair and transparent processes for dealing with the same. This policy is based on best practice in the sector and advice received from UKRIO.

One formal investigation into an allegation of research misconduct has been undertaken during the 2020-21 academic year. This investigation remains in progress. In summary, an allegation was received in November 2020 from a third party that research undertaken by a former student as part of a professional doctorate (i) was plagiarised; (ii) had been based upon falsified data and (iii) had not been conducted in accordance with ethical principles and practices.

An internal investigator with specialist knowledge and skills in the research area was appointed and a preliminary report was finalised in May 2021. The internal investigator determined that some aspects of the allegation were mistaken or could not be substantiated. However, they also determined that there was a case to answer in terms of plagiarism; falsification of data; and failure to follow ethical guidelines for the conduct of research interviews.

A formal investigation panel is in the process of being convened.

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

The Concordat states that it is important for employers of researchers to ensure that the University environment promotes and nurtures a commitment to research integrity which is communicated effectively, ensuring that the same standards apply to all. A Research and Innovation Support internal audit was conducted in 2017-18 providing recommendations to inform an action plan to further sustain and enhance the integrity of our research.

The Concordat recommends that all employers of researchers should make public an annual statement to their governing body. This document constitutes the University's annual statement for 2020/21 academic year and was presented and approved by the Quality and Audit Committee on 16<sup>th</sup> September 2021.