

SEN16D021

Title: *UEA Policy for Approving the Integrity of UEA Research and Enterprise Related Activities and Funding*
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Issue

Decisions need to be made about the approval of activities and funding related to research and enterprise. Many of these decisions are routine because they involve known and established funders and/or are for activities that are within the normal boundaries. Occasionally, specific areas of activity or sources of funding require further detailed consideration to ensure that they are consistent with UEA's stated goals and standards of integrity and ethical practice. The proposed policy provides a public statement of our standards and a procedure to be followed where there are any issues of doubt arising from those considerations which must be followed prior to any approval or acceptance of funding.

Recommendation

Recipients are invited to receive and approve the attached policy, which was reviewed and approved by the University Research Executive on 20th October 2016 and the University Enterprise Executive on 5th December and the University PGR Executive on 8th December 2016.

Resource Implications

There are no additional resource implications as the proposed procedures use existing governance structures within the University.

Risk Implications

Failure to accept this proposed policy would risk exposing the University to reputational risk from inappropriate and inconsistent consideration of integrity issues around research and enterprise activities.

Equality and Diversity

No equality and diversity issues are associated with this report.

Timing of decisions

Acceptance by the Senate and the Council will allow the policy to be introduced via communication to Faculties, Schools and individuals on approval and for the policy to be added to the routine information on UEA's framework for managing research integrity.

Further Information

For further information contact: Rachael Mold, Head of Research, Research and Enterprise Services on 01603 593949 or r.mold@uea.ac.uk.

Background

A number of other Universities already have an equivalent statement and procedure, i.e. Durham, Leicester, Bath, York, and the recommendations of the Woolf Inquiry on the London School of Economics published in October 2011 include "The LSE should have an embedded Code dealing with ethics and reputational risk which applies across the institution. That Code should be reviewed at regular intervals to ensure it is in accord with best current practice." The proposed policy, along with the recently updated "University Research Ethics Policy" and the "Guidelines on Good Conduct in Research", provides a framework to manage the risks associated with sources of funding, nature of research and enterprise activity and the conduct of the proposed activity.

Discussion

No discussion is anticipated.

Attachments

The proposed "Policy for Approving the Integrity of UEA Research and Enterprise Related Activities and Funding" is attached.

POLICY FOR APPROVING THE INTEGRITY OF UEA RESEARCH AND ENTERPRISE RELATED ACTIVITIES AND FUNDING

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Version history

Version	Date	Note
1.0	to be added	Subject to approval by the Senate and the Council

Review

This policy will be reviewed every two years, or more frequently as necessary, to ensure it remains current in the light of the minimum standards required of UEA and additional standards UEA wishes to operate to and of good practice within the HE sector. The next review date is scheduled for completion by December 2018.

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Introduction

This policy outlines the principles within UEA for considering proposed research and enterprise activities and any associated external funding to ensure that they are consistent with UEA's stated goals and standards of integrity and ethical practice. It provides a procedure to be followed where there are any issues of doubt arising from those considerations which must be followed prior to any approval or acceptance of funding.

Scope

The policy applies to the issues surrounding the approval of research and enterprise activities and their sources of funding. Consideration of the ethical issues surrounding the conduct of the activity itself is dealt within the University's Research Ethics Policy.

Background

The University takes pride in the excellence and breadth of its academic research and enterprise activities and of the external funding it receives in support of these activities. Research and enterprise activities and associated external funding are supported by the Research and Enterprise Division and the Development Office through UEA procedures and accounts or through UEA Consultancy Ltd or UEA Enterprise Ltd. In reviewing and approving research and enterprise activities undertaken by UEA staff and students, Research and Enterprise Services, Postgraduate Research Service, the Development Office, academic management roles and Heads of School work within the authority delegated to them within UEA's financial and other regulations. In undertaking this work, there can be instances where there are queries raised about the appropriateness of the research or enterprise activity or the source of funding when compared to UEA's standards of integrity and ethical practice. This code of conduct sets out the standards of integrity to be applied and provides a framework to manage the resolution of those queries.

To ensure our integrity, we safeguard academic freedom, open inquiry, and debate in the best interests of education, enrichment, and our personal and professional development. We embrace human and intellectual diversity and inclusiveness.

Principles and public statement

UEA only accepts funding for research and enterprise activities that is from legal activities; will only be used for legal actions by University staff or students; where funder goals and values are consistent with those of UEA as a charitable organisation; where academic freedom, impartial or independent research, scholarship, training and teaching are safeguarded; does not generate unacceptable real or perceived conflicts of interest; is consistent with UEA's relationship with other donors, research funders, partners or students; generates intellectual, reputational or financial value that is greater than the cost of administering the funding.

UEA undertakes research, whether on its own or with third parties, that is consistent with UEA's goals; meets UEA's good practice guidelines of honesty, integrity, openness and accountability; does not expose UEA staff, students or participants in UEA's research, or third parties, to any

unacceptable risk; is consistent with UEA's relationship with staff, students, partners, research funders or donors; does not generate unacceptable real or perceived conflicts of interest.

It is UEA policy not to accept or approve funding or activities that it judges to be inconsistent with these principles. Any decisions made are taken in good faith. At any time, UEA can review and reconsider previous decisions relating to the acceptance of funding or approval of activities if subsequent events, legislative changes or the subsequent availability of additional information requires it.

Procedures for Research and Enterprise Related Activities and Funding

A. External Funding (including donations, and postgraduate research funding)

Research and Enterprise Services, Postgraduate Research Service, Development Office, Research Centres and UEA wholly owned subsidiaries are responsible for:

1. Ensuring that the identity of any source of funding direct to UEA is clear (including any donations). Where there is evidence to suggest that the actual source of funding may be different to that originally stated, further due diligence shall be applied. In establishing the source of any financial contribution, payment or donation, care shall be taken to consider confirmed facts or legal opinion as well as reputational risk that could be incurred through public perception of any particular funder. For postgraduate research students, care should be taken to place individual students' cases in the broader context of University terms and conditions, and Regulations.
2. Reviewing any terms and conditions associated with any offer of funding to ensure they do not impose undue risk on UEA.
3. Following documented procedures in each service area for seeking internal approval and authorising acceptance on behalf of UEA. This includes following usual governance routes of Heads of School and Directors of Divisions.
4. In the event of any remaining area of doubt, following the procedure outlined in section C below prior to authorising any acceptance.

B. Research and Enterprise Activities (including activities funded by donations or with no external funding)

1. **Individual staff members** are responsible for considering the nature of their own activities as employees in light of the principles and published statement in this policy and discussing any perceived issues with their Head of School, School Manager or University Service.
2. **Heads of School** are responsible for:
 - a. Ensuring that the research and enterprise activities of member staff and students including those undertaken in Research Centres are consistent with the principles and public statement in this policy.
3. **Research and Enterprise Services, Postgraduate Research Service, Development Office, Research Centres and UEA wholly owned subsidiaries** are responsible for:
 - a. Reviewing the nature of any proposed activities linked to any external funding or where UEA or UEA subsidiary approval is required for the activity to progress to ensure that the activity is consistent with the principles and public statement in this policy.

- b. Following agreed procedures in each service area for seeking internal approval prior to authorising any acceptance. This includes following usual governance routes including but not limited to Heads of School, Directors of Service and UEA Research Ethics Committees.
- c. In the event of any remaining area of doubt, following the procedure outlined in Section C below prior to authorising any acceptance.

At any time, UEA can review and reconsider previous decisions taken in good faith relating to the acceptance of funding or approval of activities if subsequent events, legislative changes or the subsequent availability of additional information require it.

C. Additional Procedure for Resolving Areas of Doubt

1. A summary of the points of concern and the steps taken to date and advice received during usual procedures shall be prepared by the relevant Head of School, Director of UEA Service or UEA wholly owned subsidiary.
2. That summary shall be referred for consideration to the Pro-Vice-Chancellor for Research and Enterprise for matters concerning UEA or to the Chair of the Board of any subsidiary company for matters concerning the subsidiary company.
3. In considering the issues raised, the Pro-Vice-Chancellor for Research and Enterprise or Chair of the Board as relevant may:
 - a. Request further due diligence be undertaken.
 - b. Seek the advice of the Chair of the University Research Ethics Committee in instances of issues related to the conduct of research.
 - c. Seek the advice of Executive Team for all other issues.
 - d. Seek the advice of the Council.
 - e. The Pro-Vice-Chancellor for Research and Enterprise may make a decision on behalf of UEA or the Chair of the Board of any subsidiary company for matters concerning the subsidiary company.
4. The Pro-Vice-Chancellor for Research and Enterprise shall provide a statement of the decision made to the next meeting of Council or else raise the issue as a discussion item for Council.
5. A summary of any issues referred to the Pro-Vice-Chancellor for Research and Enterprise shall be included in the annual research integrity report submitted to University Research Ethics, Research Executive, the Senate and the Council. This report provides general descriptions only and not detailed identifiable information.
6. A summary of any issues referred to the Chair of the Board of any subsidiary shall be reported to the next board meeting and recorded in the minutes.

Governance

This policy is the responsibility of the Council.

Definition

Research and Enterprise includes:

- Research activities and research training undertaken by UEA staff members and registered postgraduate research students whether funded from external sources or not
- Impact activities, including public engagement, arising from research findings whether funded or not
- Translational research which develops research findings into practice undertaken by UEA staff members and registered postgraduate research students (including proof of concept and seed corn projects)
- Consultancy undertaken by UEA staff members and registered postgraduate research students through UEA Consultancy Ltd
- Business, market development or other enterprise activity undertaken by UEA staff members and registered postgraduate research students through UEA Enterprise Ltd.

Other relevant UEA documents

University Research Ethics Policy

Guidelines on Good Practice in Research

UEA Financial Regulations

University Terms and Conditions for Students

Academic Calendar including General Regulations