



# HARTPURY

## Hartpury University

### Code of Research Practice

#### Scope

The mission of Hartpury is to be a specialist niche provider delivering relevant, effective and high-quality education, training for employment and applied research in sport, equine, animal and agricultural industries; locally, regionally, nationally and internationally.

Hartpury University is committed to undertaking high quality research, undertaken in an environment of high standards of research integrity, governance and good practice. We seek to operate an open research environment, enabling access to, and sharing and replication of our research.

Whilst seeking excellence and applicability in what we do we are also conscious of the need to enable and encourage good practice in research, as embodied in this Code of Research Practice. We seek to ensure that our research vision, strategy, operational plans, resource deployment and performance monitoring all take account of our commitment to research integrity and do not introduce inappropriate or perverse incentives.

The University uses the Frascati definition of research (OECD, 2015), as employed across the sector and internationally:

Research and experimental development (R&D) comprise creative and systematic work undertaken in order to increase the stock of knowledge – including knowledge of humankind, culture and society – and to devise new applications of available knowledge.

To qualify as R&D, an activity must be all of the following: novel; creative; uncertain; systematic; transferable and/or reproducible. The term R&D covers the following three activities:

**Basic research:** experimental or theoretical work undertaken primarily to acquire new knowledge of the underlying foundation of phenomena and observable facts, without any particular application or use in view.

**Applied research:** original investigation undertaken in order to acquire new knowledge. It is, however, directed primarily towards a specific practical aim or objective.

**Experimental development:** systematic work, drawing on knowledge gained from research and practical experience and producing additional knowledge, which is directed to producing new products or processes, or to improving existing products or processes.

The Frascati Manual lists situations where certain activities are to be excluded from R&D except when carried out solely or primarily for the purposes of an R&D project. These include:

- i) routine testing and analysis of materials, components, products, processes, etc.;
- ii) feasibility studies; iii) routine software development; iv) general purpose data collection.

The Research Excellence Framework's approach (REF2021, 2019) was based on the Frascati definition, and research is defined as:

A process of investigation leading to new insights, effectively shared.

It includes work of direct relevance to the needs of commerce, industry, culture, society, and to the public and voluntary sectors; scholarship (defined as the creation, development and maintenance of the intellectual infrastructure of subjects and disciplines, in forms such as dictionaries, scholarly editions, catalogues and contributions to major research databases); the invention and generation of ideas, images, performances, artefacts including design, where these lead to new or substantially improved insights; and the use of existing knowledge in experimental development to produce new or substantially improved materials, devices, products and processes, including design and construction. It excludes routine testing and routine analysis of materials, components and processes such as for the maintenance of national standards, as distinct from the development of new analytical techniques. It also excludes the development of teaching materials that do not embody original research.

It includes research that is published, disseminated or made publicly available in the form of assessable research outputs, and confidential reports (as defined in paragraph 261).

Activities that do not meet the Frascati definition but which involve the collection of human or animal data, or which require ethical or similar approval are also subject to the requirements of this Code. All other activities are also subject to any relevant legal, regulatory and professional or subject good practice requirements.

The University seeks to meet the requirements of the Concordat to Support Research Integrity (Universities UK, 2019) and draws on other relevant Concordats, guidance and professional standards, as appropriate (see Section F for details of policies, legislation, standards and other relevant references and materials). This Code of Research Practice sets out the standards for conduct expected of all staff, students and others associated with the University (i.e. including visiting researchers, emeritus staff, associates, honorary or clinical contract holders, contractors and consultants) who are engaged in or who support our research ('researchers') in and/or for the University.

Researchers should always:

- i) Demonstrate integrity, professionalism, honesty, rigour, transparency and open communication.

- ii) Observe fairness and equity. iii) Avoid, or declare and manage, actual or potential conflicts of interest.
- iv) Show care and respect for all participants in, subjects, users and beneficiaries of research including humans, animals, the environment and cultural objects (those associated with or involved in the research).
- v) Observe all legal, regulatory and ethical requirements laid down by the University or other statutory bodies.

Research methods, results, outputs and data should, subject to appropriate confidentiality in relation to personal or commercially-protected information, be open to scrutiny, debate, sharing, further analysis and re-use. It is the expectation that those data arising from research will be managed well and archived to allow prompt sharing.

Researchers should ensure that they understand and comply with this Code, including the declaration of interests (see Section D.12). Researchers should also ensure that they are aware of and abide by other relevant Hartpury or University policies, such as those relating to equality, diversity and inclusivity, harassment, health and safety and ethics. Any breach of this Code or of related policies as applied to research will be investigated on a case by case basis under the University's Procedure for the Investigation of Allegations of Misconduct in Research (see Sections C and E).

The University will:

- i) Maintain a research environment that develops good research practice and embeds a culture of research integrity, enabling researchers to act according to the expected standards, values and behaviours.
- ii) Provide training on research ethics and research integrity with suitable learning, training and mentoring opportunities to support the development of researchers' skills throughout their careers.
- iii) Seek to ensure sustainability of its research, be that economic, environmental, academic, human, animal, physical or digital, in line with its commitment to the climate commission<sup>1</sup>.
- iv) Publish an annual statement on research integrity.
- v) Periodically review research practice and culture to ensure that practice remains fit for purpose.

## **Responsibilities Organisational Bodies**

Corporation, as the governing body of the University, monitors institutional effectiveness including the application of the Code and its principles, primarily through the Annual Research

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<sup>1</sup> [https://www.eauc.org.uk/climate\\_commission;Hartpury News-hartpury-joins-efforts-to-tackle-global-crisis-as-member-of-new-climate-commission/](https://www.eauc.org.uk/climate_commission;Hartpury%20News-hartpury-joins-efforts-to-tackle-global-crisis-as-member-of-new-climate-commission/)

Integrity Statement. It also receives updates and advice from the Hartpury Executive Team, as appropriate.

The Academic Board is responsible for the academic direction of the University and for the conduct of academic activities. It promotes good practice and innovation in scholarship, research, and learning, teaching and assessment.

The Research and Knowledge Exchange Committee develops and invigorates research and knowledge exchange activities at the University, encouraging cultures and activities that are consistent with the University's mission. It acts to promote and exchange good practice in relation to the development of researchers.

The Research and Knowledge Exchange Committee is responsible for policy on and oversight of all areas of research governance and integrity, including good practice, risk management, human and animal ethics, and handling of misconduct. It receives reports from the Research Ethics Committee and provides reports, including the Annual Research Integrity Statement, to Academic Board and thence to Corporation.

## **Individuals**

The Academic Dean (RKE) is the University's officer with lead responsibility for research and knowledge exchange and its conduct. The Dean chairs the Research and Knowledge Exchange Committee and seeks to promote and foster a culture of professional integrity in research practice.

All research projects, including internally funded projects, must have a designated individual identified as having responsibility to the University for the project. This will typically be the member of staff who is the Principal Investigator of the project or the lead supervisor of a student undertaking research.

The University has a confidential process for individual researchers to declare personal circumstances that may affect or have affected their ability to undertake research. Details of this process can be found in the Staff Handbook as part of the Appraisal Process. Line managers and supervisors should treat these declarations accordingly, and take them into account when overseeing, advising and supporting the researcher.

All researchers have a personal responsibility to undertake research to the highest standards of integrity, governance and ethical practice, in compliance with this Code. All researchers should seek to work in an open and professional manner. Students registered for a Research Degree are subject to the Regulations of the University of the West of England, with whom they are registered for their degree. Students must therefore be aware of and abide by those Regulations.

Heads of Department (and other line managers, as relevant) have a responsibility to ensure that staff and student researchers in their departments pursue the highest standards of research integrity, governance and ethics in compliance with the Code whilst seeking to foster a culture of openness and professional integrity in research practice. Departments will draw attention to the Code in their induction processes for newly appointed staff and for students at an appropriate point in their studies. Heads of Department should actively ensure that

researchers receive adequate management, guidance, and training to ensure compliance with the Code. Dedicated mentoring should be offered on any particular area where the researcher requires support.

Senior research staff have some responsibilities in common with Heads of Department, in creating and maintaining an environment that encourages and supports high standards of research integrity. They should ensure that staff and student researchers act in compliance with the Code, and provide advice, guidance and training as appropriate.

Principal Investigators and others with a designated research leadership or management role, have a responsibility to ensure that the highest standards of research integrity, governance and ethical practice are met, that research activities are undertaken in compliance with the Code by staff and students under their supervision, and to seek to foster a culture of openness and professional integrity in research practice. Principal Investigators are responsible for creating and maintaining a safe, open and collaborative working environment, which should include being clear about processes in place that allow people to raise issues of concern, notably in relation to bullying and harassment or research misconduct. Principal Investigators should actively ensure that Early Career Researchers receive adequate management, guidance, and training to ensure compliance with the Code. Dedicated mentoring should be offered on any particular area where the researcher requires support.

Supervisors of students engaged in research have a responsibility to ensure that students under their supervision meet the highest standards of research integrity, governance and ethical practice in compliance with the Code, and seek to foster a culture of openness and professional integrity. Supervisors of students have a special responsibility for ensuring that they provide guidance on the ethical principles that underpin research and that they provide appropriate support to their supervisees in submitting ethical review applications of a standard necessary to commence research. Supervisors shall ensure that their students receive on-going support (including training) to conduct research in compliance with the Code and will direct students to any additional training or support that may be required. Supervisors of PhD students need to meet the criteria and training requirements of the Regulations of the University of the West of England, and to be aware of and abide by those Regulations.

The Concordat to Support the Career Development of Researchers emphasises that researchers should take a proactive role in their own personal development. Researchers must ensure that they undertake appropriate training to enable them to meet these requirements. As well as taking advantage of the range of training and development opportunities provided across the University, research students are required to attend workshops in core skills, including research integrity and ethics.

### **Operation of the Code of Research Practice**

It is a condition of conducting research under the auspices of the University that practice conforms to this Code. Failure by a researcher to comply with the provisions of the Code will be grounds for action to be taken under the University's Procedure for the Investigation of Allegations of Misconduct in Research ('the Procedure'). Alleged misconduct in research relating to doctoral level research or to a thesis that has been submitted for examination will normally also be investigated under the Procedure.

Unless considered significant, allegations of breaches of the Code in taught postgraduate and undergraduate programmes will normally be considered under the University's Academic Regulations.

This Code must be implemented alongside all other relevant policies and standards published by the University, as revised from time to time.

Where a researcher is in doubt about the applicability of the provisions of the Code, or about the appropriate course of action to be adopted in relation to it, advice should be sought from the Academic Dean (RKE) or Head of Research. Students should, in the first instance, seek advice from their designated academic supervisor.

### **Details of the Code of Research Practice Principles of Research Integrity**

The core elements of research integrity are reflected in the expectations laid out at the bottom of page 2, and apply to all aspects of research throughout its lifecycle, including:

- i) Fundamentals of research work such as: upholding rigour aligned to accepted disciplinary norms and standards; maintaining professional standards; documenting methods and outcomes; questioning one's own findings; attributing and acknowledging honestly the contribution of others.
- ii) Leadership and co-operation in research groups.
- iii) Undertaking research with the highest standards of ethical practice and research integrity.
- iv) Taking special account of the needs of early career researchers.
- v) Sourcing, using, managing, storing and archiving data for research effectively and in compliance with relevant standards and policies.
  
- vi) Sharing research outputs and data effectively and in line with the University's policies on Open Access.
- vii) Undertaking research in line with University policies, legal and regulatory requirements, and the relevant professional codes of practice.

Researchers must be able to exercise freedom in their academic choices, and must therefore also accept responsibility for the decisions that they make. Thus, the primary responsibility for ensuring that they act in accordance with these principles in all aspects of their research work, including peer review, lies with the individual.

It is important that a culture of honesty and integrity in research is fostered and maintained in the University. At the heart of all research, regardless of discipline, is the need for researchers to be honest in respect of their own actions and in their responses to the actions of other researchers. This applies to the whole range of research work, including methodological and experimental design, conduct, generating and analysing data, publishing results, acknowledging appropriately the direct and indirect contributions of colleagues, collaborators and others, and the translation and use of the results.

## **Legal, Regulatory and Ethical Frameworks**

All research undertaken in, under the auspices of or for the University must abide by the relevant legal, regulatory, ethical and professional frameworks. Any special standards of work performance and ethical conduct imposed by law or by the University in relation to particular categories of research are deemed to be included in this Code.

Researchers must take responsibility for ensuring their on-going awareness of and compliance with relevant legislation (national and international where relevant) together with the ethical frameworks and standards of research set by the funders, scientific and professional bodies, and other relevant stakeholders.

In addition to receiving approvals to commence research through internal processes, researchers are required to follow any local regulations, Codes of Practice and Standard Operating Procedures pertaining to their work.

## **Research with Human Participants**

In accordance with the University Ethical Review process, approval from an appropriate research ethics committee or delegated officer (e.g. for taught student programmes) must be sought for all research that involves human participants, their tissue or data before the start of work.

In research where human beings are the subject of physical tests or physical intervention, the Principal Investigator must submit protocols on ethical, health and safety procedures for approval by the relevant Research Ethics Committee. Research meeting specific criteria may also be subject to the approval of an appropriate national body, e.g. the Health Research Authority, after securing University Sponsorship.

Research using healthy volunteers as participants that requires medically-qualified supervision to ensure the safety of participants will be subject to the review and scrutiny prescribed in the University's Research Governance Standard Operating Procedures.

The University expects that research with children, young people and vulnerable (or potentially vulnerable) adults will be planned and executed recognising requirements for awareness of safeguarding mechanisms supported by appropriate training wherever required.

## **Research with Animals**

All research involving animals should have approval through the University Ethical Review process, regardless of its status in relation to the Animals (Scientific Procedures) Act 1986 or the location of the research activity. Research undertaken by collaborative partners or on a contractual basis for the University is not exempt from these requirements.

Researchers should consider at an early stage in the design of any research involving animals the opportunities for reduction, replacement and refinement of any animal involvement.

The University expects that research involving animals, including by observation of normal activity, will be planned and executed recognising requirements for awareness of animal

welfare and consideration of the animal's owner or keeper. Where the owner or keeper is a child, a young person or a vulnerable (or potentially vulnerable) adult appropriate safeguarding arrangements should be put in place.

### **Research using Genetic Resources and Traditional Knowledge**

Any work that involves genetic resources or the use of traditional knowledge must comply with the Nagoya Protocol<sup>2</sup>, a supplement to the Convention on Biological Diversity, which promotes the fair and equitable sharing of the benefits of research that uses genetic resources. The Protocol includes obligations related to access, benefit-sharing and compliance. Adherence to the Protocol must be flagged and addressed in the ethical approval process.

### **Good Clinical Practice**

Research Integrity in veterinary clinical research involves compliance with Good Clinical Practice (GCP) (EMA, 2000).

Good Clinical Practice is intended to be an international ethical and scientific quality standard for designing, conducting, monitoring, recording, auditing, analysing and reporting clinical studies evaluating veterinary medicinal products.

Guidance has been developed under the principles of the International Cooperation on Harmonization of Technical Requirements for Registration of Veterinary Medicinal Products (VICH) and provides a unified standard for the European Union (EU), Japan and the United States of America to facilitate the mutual acceptance of clinical data by regulatory authorities – VICH-GL9 (GCP).<sup>3</sup>

All clinical studies evaluating veterinary medicinal products must be conducted to VICHGCP standards.

### **Leadership of Research**

Principal Investigators and group leaders must ensure that the appropriate direction of research and the supervision of researchers (including training) is provided.

The creation of an environment where everyone is treated fairly and with respect is essential to facilitating good research. Within a research group (where one exists) and Communities of Practice, responsibility for creating such a climate lies with the group leader or convener. Group leaders are responsible for creating and maintaining a safe, open and collaborative working environment which should include being clear about processes in place that permit raising issues of concern, notably in relation to bullying and harassment, and research misconduct.

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<sup>2</sup> <https://www.cbd.int/abs/about/>

<sup>3</sup> <https://www.vichsec.org/en/home.html>



## **Leadership of Early Career Researchers**

Heads of Department, Associate Heads of Department, senior research staff, Principal Investigators, and any individual with line management or supervision responsibilities for researchers, should actively ensure that Early Career Researchers receive adequate management, guidance, and training to ensure compliance with the Code. Dedicated mentoring should be offered on any particular area where the researcher requires support. Early Career Researchers should be signposted to relevant training and development opportunities.

## **Data Management**

Research data are all data arising as a result of a research project. This includes raw data, analysed data, and also data that arise during the course of research that are later translated into another form or destroyed, such as audio and video recordings. Data can take many forms, including paper and electronic records, recordings or products arising from the research.

Research data management refers to all aspects of data management concerned with research, from developing a data management plan at the inception, through the life of the project, to archiving of and making available, where appropriate, research data.

Inadequate attention to research data management can result in serious research misconduct, including breaches of confidentiality, or errors in reported data. For this reason, the University regards research data management as an important aspect of good research practice, and requires a data management plan to be created for all research and for the plan to be submitted alongside the application for ethical approval and for institutional approval. Such plans should include arrangements for long-term storage, curation and access in a place accessible by the University, independent of the future location of the researcher.

The University processes personal data for research purposes in relation to its public tasks and its legitimate interests. These legal bases for processing are regularly reviewed and balanced against individual rights and freedoms. Informed consent is relied on as a legal basis for processing data from participants of research. The form of consent that is needed from them will depend on the type of personal data gathered and the context in which the data collection and use is taking place.

Responsibility for research data management within any research project, programme or activity lies primarily with the relevant Principal Investigator. If a Principal Investigator is not formally identified, the responsibility applies to the most senior researcher involved with the work.

Researchers should ensure that the following principles and standards are fully integrated into their normal practice as researchers, and applied to research undertaken, irrespective of whether it is externally funded or not.

- i) Research data must be managed to appropriate standards throughout the research lifecycle. Researchers should not misrepresent or make inappropriate use of their data, or encourage others to do so.

- ii) Research data should be made available to other researchers and to the public in an appropriate and accessible form and in a timely way wherever such publication is practical, legal, ethical, and commercially viable. Research data may be deposited in an appropriate national or international data service or domain repository, and / or the University repository. Metadata relating to the data set should always be deposited in the University repository.
- iii) The University expects researchers to ensure that data of long-term value (for example, data that underpin a publication or thesis, or that will form the basis of a future funding application) will be securely held in a place accessible by the University for a period of ten years after the completion of a research project, or for longer if specified by the research funder or sponsor. This applies whether or not the researcher leaves the University.
- iv) Ownership or exclusive rights to reuse or publish research data should not be granted to commercial publishers, agents or others without retaining the rights to make the data openly available for re-use, unless this is a condition of funding.
- v) All substantive research proposals that include the collection and/or analysis of data must include research data management plans explicitly addressing data capture, management, integrity, confidentiality, storage, retention, and transportation, sharing and publication. The plans should be in line with relevant standards and good practice within the disciplinary community and proportionate to the type of data intended to be collected.
- vi) Secure and appropriate safeguards relating to digital and physical storage should be used for all data, and data should be accessed only in appropriate locations where it is not vulnerable to loss or illegitimate access. Researchers working offsite should undertake risk assessments and plan accordingly. Data relating to human participants which are identifiable, pseudonymised/coded or traceable and commercially sensitive data must be encrypted to an appropriate standard. Researchers are responsible for reporting actual or suspected data breaches of data security to the University's Data Protection Officer at the earliest possible opportunity who will then assess whether the Information Commissioner's Office will need to be notified.
- vii) For data collection involving human participants or animals, explicit participant or owner / keeper consent respectively must always be secured at the outset, and the data must only be used in accordance within the letter and spirit of that consent unless there is the explicit approval of an ethics committee to do otherwise.
- viii) Non-anonymised personal data must be held, and ultimately destroyed, in compliance with data protection legislation and the University's data protection policies. Accordingly, the extent of non-anonymised personal data stored must be adequate, relevant, and not excessive.
- ix) Research data should be available for access by other researchers and to the public in appropriate forms, except where confidentiality provisions prevail, in accordance with the University's Policy on Open Access and Open Data. In general, academic enquiry and debate require openness, but confidentiality provisions relating to publication may apply in circumstances where the University or the researcher has made or given confidentiality undertakings to third parties or confidentiality is required to protect intellectual property rights, or where confidentiality is a funder requirement.

- x) Published research outputs should normally include a statement, or appropriate referencing, to advise how and on what terms any supporting research data may be accessed.
- xi) Researchers do not have the authority to sign data sharing agreements or enter into legally binding arrangements or reassurances for the management of data on behalf of the University; this rests with the Chief Operating Officer. The Academic Dean (RKE) should be approached in the first instance to advise on the most appropriate course of action.

## **Publication of Results and Other Research Outputs**

The following provisions apply to publications and other research outputs.

- i) All publications and research outputs must report research and research findings accurately and with integrity.
- ii) A publication that is substantially similar to another publication derived from the same research or data must contain appropriate reference to the other publication.
- iii) A researcher who submits substantially similar work to more than one publisher should disclose that fact to the publisher at the time of submission.
- iv) All publications and research outputs must be made available to other researchers and to the public in accordance with the University's policies on Open Access, and researchers are encouraged to meet standards for Open Access required by funders or by government bodies wherever practically possible.
- v) It is each researcher's responsibility to ensure that every publication or other research output produced by that researcher whilst at the University has a record created in the University's research repository except in very rare cases where creation of such a record would pose a security risk or is prohibited for other legitimate reasons connected to the nature of the research. Wherever possible, the output record will also include deposit of a manuscript or equivalent materials.

## **Authorship**

The following provisions apply to authorship.

- i) A publication (and as far as practically possible, any other kind of research output) must contain reference to the contributions of all participants who have made a significant contribution to the relevant research. Referencing and related aspects of research outputs should be compliant with the guidelines of the Committee on Publication Ethics (COPE)<sup>4</sup>.
- ii) Any person who has participated in a substantial way in conceiving, executing or interpreting at least part of the relevant research should be given the opportunity to be included as an author of an output derived from that research. The ordering of the authors' names should take account of the contribution of each individual to the output, not their organisational position.

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<sup>4</sup> [publicationethics.org](http://publicationethics.org)

- iii) Any person who has not participated in a substantial way in conceiving, executing or interpreting at least part of the relevant research should not be included as an author of an output derived from that research, but may be appropriately acknowledged.
- iv) In addition to meeting the requirements detailed above, an author must ensure that the work of research students, research staff, and technical and support staff is recognised in a publication derived from research to which they have made a significant contribution. Authors must also ensure that funders of the research are appropriately acknowledged.

### **Declaration and Management of Conflicts of Interest**

Researchers must act at all times with integrity, in the best interests of the University. Conflicts or perceived conflicts of interest may arise as a consequence of undertaking research, in particular with third parties. All University staff and research students are required to recognise and disclose activities that might give rise to such conflicts, and to ensure that such conflicts are seen to be properly managed or avoided.

Conflicts of interest refer to situations in which financial or other personal considerations may compromise, or have the appearance of compromising, professional judgement and integrity. These might relate to financial matters and personal or family gain, personal relationships, organisational and professional commitments or obligations, career progression, and commercial arrangements. Conflicts of interest also relate to the use of time and resources, and can occur where personal interests or non-University activities harm or interfere with the productivity and involvement of a researcher.

Disclosure of a conflict or potential conflict in relation to research should be made at the time the conflict is first recognised. The disclosure should be made to the Academic Dean (RKE), with whom agreement should be reached as to how the conflict should be managed. Any future institutional requirement for declaration of interests would take precedence over and replace this requirement.

In addition, researchers should declare any relevant conflicts or potential conflicts of interest as part of their request for ethical and institutional approval of each research project. This will ensure compliance with external funder requirements as well as with this Code.

Members of staff have a responsibility to declare the following areas of activity.

- I. All directorships registered under the Companies Act, whether or not they are remunerated.
- II. Employment, office or profession or other activity apart from employment by the University.
- III. Other interests, for example: clients or business relationships which they know to have a direct connection with the University and its associated companies or which might affect their business; any significant shareholdings in organisations which they know to have business with the University or its associated companies; unremunerated posts, honorary positions and other connections which may give rise to a conflict of interest or of commitment or of trust.

- IV. Financial conflict of interest includes, but is not restricted to, personal or close family affiliation to, or financial involvement with, any organisation sponsoring or providing financial support for a project undertaken by a researcher. The following provisions apply to situations of actual or potential financial conflict of interest.
- V. Financial involvement includes direct personal financial interest, receipt of personal benefits (such as travel and accommodation) and receipt of material or facilities for personal use. (For the avoidance of doubt, the provision of sponsored studentships or elements of travel/accommodation for students or researchers in connection with the research should be excluded from this definition.) Researchers should act in full accordance with the normal principles of financial accountability.
- VI. Where it is unavoidable that a purchase is made from a company in which a researcher has a direct financial interest, i.e. he/she or a member of their family stands to gain financially, the researcher is required to disclose this interest. This would include, but is not restricted to, cases where the researcher or a member of their family is an employee, director or partner, has a shareholding of greater than 25% or acts as a consultant to the company. The researcher will be barred from authorising the purchase and should seek advice from the Academic Dean (RKE) regarding how to proceed.
- VII. A researcher must comply with a direction made by their Head of Department or line manager in relation to a personal conflict of interest in research. The Head of Department may seek advice from the Pro Vice-Chancellor in cases of doubt.
- VIII. Members of staff must not participate in committees or other groups acting on behalf of the University or its associated companies where there is a clear possibility that a conflict of interest will regularly arise.

### **Purchasing and Expenditure for Research**

Purchasing and expenditure of funds should take place in accordance with the terms and conditions of any grant or contract held for the research, with the University's Financial Regulations, and with the University's Conditions of Purchasing Policy.

Financial reimbursement or incentives for research participants must be considered appropriate and proportionate to the proposed research activity. Volunteers participating in research may be compensated financially for reasonable travel expenses, inconvenience and for time given to contribute to the research. Payments made to individuals must not be so large as to induce individuals to risk harm beyond that which they would usually accept or to distort their contribution to the research.

### **Submitting Applications for Funding**

Principal Investigators should take all reasonable measures to ensure the accuracy of information contained in applications for funding and must ensure that it has been reviewed and approved by the necessary internal signatories. All research funding applications must be approved by the Academic Dean (RKE) and the Chief Operating Officer, or their delegates, prior to their submission. Researchers do not have the authority to sign agreements or enter into legally-binding arrangements on behalf of the University; this rests with the Chief Operating Officer.

Principal Investigators shall ensure that they understand the terms of research funding and be aware of their responsibilities for reporting and other conditions before submitting the application for funding.

A researcher who submits substantially similar work to more than one funder should disclose that fact to the funder at the time of submission.

As outlined in the Ethical Business Development and Fundraising Policy, there may be circumstances in which ethical issues arise when considering whether or not to apply for or accept funding for research from particular sources. It is important that the interests of all staff and the interests and the reputation of the University as a whole are safeguarded when seeking and accepting external funding. While it is outside the scope of this guidance to provide an exhaustive list of specific examples of what may or may not be acceptable sources of funding, circumstances where the following may occur would cause concern and further advice should be sought from the Academic Dean (RKE).

- i) A third party is involved and the original source of the funding is unknown or cannot be identified.
- ii) A funding organisation wishes to place inappropriate restrictions on publication and exploitation of research.
- iii) A funding organisation is attempting to exert pressure to suppress or alter the results of the research which do not further, or may damage, its interests, commercial or otherwise.
- iv) A member of staff may have an interest in a funding organisation.
- v) Where accepting funds from one source may compromise the ability of the University to apply for or accept funds from another source.
- vi) The practices of a potential sponsor or their motives in commissioning the research may conflict with the mission, aims and objectives of the University.
- vii) The ethical and political implications of undertaking research or accepting research funding from a particular source could result in negative publicity and/or may seriously damage the reputation of the University.
- viii) The conduct of research may harm or place at undue risk members of the public, participants, staff or students.
- ix) The case might generate any mandatory or voluntary reporting requirement under the National Security and Investment Act.

In addition to these circumstances, there may also be instances in which the University's insurance does not adequately cover the circumstances of the proposed research. In such cases, the research must not take place unless or until appropriate insurance has been put in place (at the expense of the relevant project).

### **Sponsorship of Postgraduate Research Students**

Postgraduate research students might be funded by a range of different organisations, or be self-funded. Supervisors and principal investigators should ensure that any sponsor is an appropriate body for the University to have a relationship. Whilst the primary responsibility is to Hartpury, consideration should also be given to the University of the West of England as

the degree-awarding body for the University's research students. Similar circumstances apply as to those listed in the previous section on receipt of external research funding.

In addition, supervisors and principal investigators should ensure that there is no conflict of interest between the sponsor and the student's ability to complete their thesis as required by the University's Academic Regulations and by the Academic Regulations of the University of the West of England.

### **Intellectual Property, Research and Commercial Interactions**

Researchers should be aware of, and take appropriate steps to protect, any intellectual property (IP) arising from their work. The University wishes to encourage the development and exploitation of its intellectual property, through whichever means is most appropriate, to the benefit of the University, its staff and as part of its contribution to society.

Researchers, including students and their supervisors, should be aware of the University's Intellectual Property Policy, which includes details of rights to any IP, and any income generated from their work.

The translation of the results of research into beneficial outcomes typically involves engagement with other organisations and individuals, both commercial and non-commercial. Researchers should be alert to the nature and interests of those third parties, taking into consideration the reputation and interests of the University as well as of themselves.

The University negotiates each contractual and commercial agreement based on its needs and its merits. In doing so, it has a set of significant elements in relation to research agreements that act as a reference point (not an absolute position) for such negotiations. Researchers should not seek to undermine this position. The key desirable contractual elements are:

- i) Ability to publish the results of the work, with limited restrictions on time scale (with respect to notice periods and total elapsed time) to enable the protection of the results or for the funder to publish the formal report first.
- ii) Ability to continue research in the area, working with other relevant organisations.
- iii) Time-limited mutual confidentiality of the information.
- iv) No warranty for the results of the work nor their uses.
- v) Funder to indemnify the University for loss, liability or damage, except for University negligence or wilful misconduct.
- vi) Pricing that reflects the conditions applied in a regulated market or that takes account of the full economic cost, the market value of the activity to the customer and the academic value to the University in unregulated markets.
- vii) Full or partial payments in advance, or against key milestones.
- viii) Termination by 90 days' notice on either side, with payment for all outstanding and non-cancellable costs.
- ix) Either:
  - a. Funder ownership of the foreground intellectual property (IP), with a royalty-free, world-wide, perpetual licence to the University for educational and research purposes and for exploitation outside the funder's field of interest, an expectation / obligation that the funder makes positive use of

the IP, and agreement that lump sum or royalty payments will be reasonably negotiated in the event of successful exploitation by the funder;

Or

- b. University ownership of IP generated from the activity, with an option (exclusive for a defined period) for the funder to license in relevant fields where appropriate.

In both cases, use of University background IP is additional and subject to negotiation and terms. It is recognised that approaches to IP management necessarily differ between industrial sectors, and the form of the IP.

When undertaking contractual negotiations, the University is cognisant of its responsibilities under the Charities Act 2006, which requires public benefit to be shown for activities that require support from public funds, and under the National Security and Investments Act 2021. Researchers also need to be aware of these responsibilities.

### **Misconduct and Allegations or Complaints of Misconduct**

Misconduct in research is defined as any breach of the University's Code of Research Practice, or other practices that seriously deviate from those that are commonly accepted within the academic and research communities for proposing, conducting, reporting, translating or using research. It specifically encompasses, but is not restricted to:

- i) Fabrication, including the creation of false data or other aspects of research, including documentation and participant consent.
- ii) Falsification, including the inappropriate manipulation and/or selection of data, imagery and/or consents. iii) Misrepresentation of data and/or interests and/or involvement and/or qualifications, experience or credentials and/or publication history.
- iv) Plagiarism, including the general misappropriation or use of others' ideas, intellectual property or work (written or otherwise), without acknowledgement or permission.
- v) Failure to follow required legal, regulatory or professional obligations or processes.
- vi) Failure to declare actual or potential conflicts of interest to line manager or others as required.
- vii) Failure to follow accepted procedures or to exercise due care in carrying out responsibilities for avoiding unreasonable risk or harm to humans, animals used in research or the environment.
- viii) Any breach of data protection legislation or failure to follow accepted procedures or to exercise due care in carrying out responsibilities for the proper handling of privileged or private information on individuals or organisations collected during the research.
- ix) Improper conduct in peer review (or equivalent) of research proposals, results, manuscripts or other processes.
- x) Intentional damage to, or removal of, the research-related property of another.
- xi) Improper dealing with allegations of misconduct.
- xii) Intentional non-compliance with: the terms and conditions governing the award of external funding for research; the University's policies and procedures relating to



research, including accounting requirements, ethics, and health and safety regulations; or any other legal or ethical requirements for the conduct of research.

Misconduct in research does not include unintentional error or professional differences in interpretation or judgment of data.

For the avoidance of doubt, misconduct in research includes acts of omission as well as acts of commission.

Staff and students have a duty to report misconduct in the prosecution of research, where they have good reason to believe it is occurring, to the Deputy Vice-Chancellor. The University will investigate allegations or complaints about misconduct in research or about scientific or scholarly fraud.

Failure by a researcher to comply with the provisions of this Code will be grounds for action to be taken under the University's Procedure for the Investigation of Allegations of Misconduct in Research (the Procedure). In particular, any allegation or complaint of misconduct will be investigated and dealt with under the Procedure and may be subject to action under the University's disciplinary procedures. Alleged misconduct in research relating to a PhD student's research or to a thesis that has been submitted for examination will normally be investigated under the Procedure.

Any complainant who can be shown to have acted maliciously may also be subject to action under the University's disciplinary procedures.

Researchers who wish to submit their work to a formal process of internal scrutiny (in the event of retraction of published work or similar) are required to initiate the Procedure for the Investigation of Allegations of Misconduct in Research.

## **Reference to Other Policies Appendix I: University Policies, Legislation and Standards of**

### **Good Practice University Policies**

Note: in some cases, these policies are currently styled as being of the College, but apply to Hartpury as a whole and hence to the University.

#### Academic Regulations

[Policies, regulation, and information | Hartpury University & Hartpury College](#)

#### Academic Regulations of the University of the West of England

<https://www2.uwe.ac.uk/services/Marketing/students/Student%20advice/Regulationsdocuments/2019-20/Academic-Regulations-2019-2020-Volume-2-PGR.pdf>

#### Code of Professional Conduct

[code-of-professional-conduct-2022.pdf \(hartpury.ac.uk\)](#)

Conditions of Purchasing Policy

N/A

Data Protection and Information Governance Policy

[data-protection-policy-2022.pdf \(hartpury.ac.uk\)](https://www.hartpury.ac.uk/media/1doacca/hartpury-data-protection-policy-2022.pdf)

Equality, Diversity & Inclusivity Policy

[equality-diversity-and-inclusivity-policy-2022.pdf \(hartpury.ac.uk\)](https://www.hartpury.ac.uk/media/1doacca/hartpury-equality-diversity-and-inclusivity-policy-2022.pdf)

Ethical Business Development and Fundraising Policy

[ethical-business-development-and-fundraising-policy-2022.pdf \(hartpury.ac.uk\)](https://www.hartpury.ac.uk/media/1doacca/hartpury-ethical-business-development-and-fundraising-policy-2022.pdf)

Financial Regulations (incorporating Anti-Bribery, Fraud, Expenses, International Travel and Treasury policies)

<https://www.hartpury.ac.uk/media/uonj322l/financial-regulations-2023-v2.pdf>

Harassment Policy

<https://www.hartpury.ac.uk/media/x4aamlbu/harassment-and-bullying-policy-2020.pdf>

Health, & Safety Policy

<https://www.hartpury.ac.uk/media/ynjp3kzz/health-and-safety-policy-december-2022.pdf>

Health & Wellbeing Policy

N/A

Policy on Open Access and Open Data

N/A

Intellectual Property Policy

[https://www.hartpury.ac.uk/media/kwvl4fhx/intellectual-property-policy-v2\\_approved.pdf](https://www.hartpury.ac.uk/media/kwvl4fhx/intellectual-property-policy-v2_approved.pdf)

Procedure for the Investigation of Allegations of Misconduct in Research

[https://www.hartpury.ac.uk/media/e3vor00j/hartpury-procedure-for-investigation-of-research-misconduct-v2-2023\\_approved.pdf](https://www.hartpury.ac.uk/media/e3vor00j/hartpury-procedure-for-investigation-of-research-misconduct-v2-2023_approved.pdf)

Public Interest Disclosure Procedure ('Whistle Blowing')

<https://www.hartpury.ac.uk/media/40ffn35v/public-interest-disclosure-policy-and-procedure-whistleblowing-policy-2020.pdf>

REF2021 Code of Practice

<https://www.hartpury.ac.uk/media/1doacca/hartpury-ref-code-of-practice.pdf>

Research Governance Standard Operating Procedures

[https://www.hartpury.ac.uk/media/ihglpnky/research-governance-standard-operating-procedures\\_16-march2022-v1.pdf](https://www.hartpury.ac.uk/media/ihglpnky/research-governance-standard-operating-procedures_16-march2022-v1.pdf)

Slavery and Human Trafficking Statement

<https://www.hartpury.ac.uk/media/5v5hy5oh/slavery-and-human-trafficking-statement-2020.pdf>

## **Relevant Legislation**

Animals (Scientific Procedures) Act 1986 (ASPA) -

<http://www.legislation.gov.uk/ukpga/1986/14/contents>

Care Act 2014

<http://www.legislation.gov.uk/ukpga/2014/23/contents/enacted>

Copyright, Designs and Patents Act 1988 (as updated)

<http://www.legislation.gov.uk/ukpga/1988/48/contents>

Data Protection Act 2018

<http://www.legislation.gov.uk/ukpga/2018/12/contents/enacted>

Human Tissue Act 2004

<https://www.legislation.gov.uk/ukpga/2004/30/contents>

Medicines for Human Use (Clinical Trials) Regulations 2004

<http://www.legislation.gov.uk/uksi/2004/1031/contents/made>

Mental Capacity Act 2005

<http://www.legislation.gov.uk/ukpga/2005/9/contents>

Patents Act 1977 (as updated)

<http://www.legislation.gov.uk/ukpga/1977/37/contents>

Safeguarding Vulnerable Groups Act 2006

<http://www.legislation.gov.uk/ukpga/2006/47/contents>

National Security & Investment Act 2021

[National Security and Investment Act: guidance for the higher education and research-intensive sectors - GOV.UK \(www.gov.uk\)](#)

## **Policies and Standards of Research Integrity**

Committee on Publication Ethics (web page)

<https://publicationethics.org/>

International Council for Harmonisation of Technical Requirements for Pharmaceuticals for Human Use (ICH) (including GCP)

<https://www.ich.org/products/guidelines/efficacy/efficacy-single/article/integratedaddendum-good-clinical-practice.html>

Nagoya Protocol, Convention on Biological Diversity (CBD), October 2010,  
<https://www.cbd.int/abs/about/>

Research Councils UK (2013). *Policy and Guidelines on Governance of Good Research Conduct*. Swindon: Research Councils UK. [UKRI-050321-PolicyGuidelinesGovernanceOfGoodResearchConduct.pdf](#)

UK Policy Framework for Health and Social Care Research (2017)  
<https://www.hra.nhs.uk/planning-and-improving-research/policies-standardslegislation/uk-policy-framework-health-social-care-research/>

UK Research Integrity Office (2009). *Code of Practice for Research: Promoting good practice and preventing misconduct*. London: UKRIO.  
[www.ukrio.org/wp-content/uploads/UKRIO-Code-of-Practice-for-Research.pdf](http://www.ukrio.org/wp-content/uploads/UKRIO-Code-of-Practice-for-Research.pdf)

UK Research and Innovation. Research Integrity (web page)  
[Research integrity – UKRI](#)

Universities UK (2019), The Concordat to Support Research Integrity, Universities UK, October 2019  
<https://www.universitiesuk.ac.uk/policy-and-analysis/reports/Pages/the-concordat-forresearch-integrity.aspx>

Vitae (2019), The Concordat to Support the Career Development of Researchers, Vitae, September 2019  
<https://www.vitae.ac.uk/policy/concordat>

## **Other Materials**

Concordat for the Advancement of Knowledge Exchange in Higher Education in England (Draft), Universities UK, 2019  
<https://www.universitiesuk.ac.uk/policy-and-analysis/reports/Pages/knowledgeexchange-concordat-consultation.aspx>

Concordat for Engaging the Public with Research, 2013  
<https://www.ukri.org/wp-content/uploads/2020/10/UKRI-151020-ConcordatforEngagingthePublicwithResearch.pdf>

Concordat on the Openness of Animal Research (COAR) (web page)  
<http://concordatopenness.org.uk/>  
<http://www.understandinganimalresearch.org.uk>

EAUC (2019), Climate Commission for UK Higher and Further Education Students and Leaders, EAUC, October 2019

[https://www.eauc.org.uk/climate\\_commission](https://www.eauc.org.uk/climate_commission)

EMA (2000), VICH GL9 Good clinical practices, European Medicines Agency, July 2000

<https://www.ema.europa.eu/en/vich-gl9-good-clinical-practices>

<https://www.vichsec.org/en/about/what-is-vich.html>

National Centre for the Replacement, Refinement & Reduction of Animals in Research (NC3Rs) (web page)

<https://www.nc3rs.org.uk/>

OECD (2015), Frascati Manual 2015, OECD, 2015

<https://www.oecd.org/sti/frascati-manual-2015-9789264239012-en.htm>

REF2021 (2019), Guidance on submissions, REF2021, REF 2019/01, January 2019

<https://www.ref.ac.uk/guidance-and-criteria-on-submissions/news/ref-2021-resumes-with-additional-guidance-on-covid-revisions/>

### **Equality, Diversity and Inclusion**

As with all Hartpury policies and procedures, due care has been taken to ensure that this policy is appropriate to all members of staff regardless of their age, disability, ethnicity, gender, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sexual orientation and transgender status.

The policy will be applied fairly and consistently whilst upholding Hartpury's commitment to providing equality to all. If any employee feels that this or any other policy does not meet this aim, please contact the HR Department.

Hartpury is committed towards promoting positive mental health by working towards the MINDFUL EMPLOYER Charter. Hartpury aims to create a culture of support within the workplace where employees can talk about mental health problems without the fear of stigma or discrimination.

### **Approval and Review Cycle**

Date Last Approved	October 2023
Policy Owner	Academic Dean (RKE)
Approving Committee	Academic Board
Status	Approved
Effective from	October 2023
Next Review Date	October 2025