

Policy for Approving the Integrity of UEA Research and Innovation Related Activities and Funding

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Date: 9th January 2023 (Approved by Senate on 22nd February 2023)

Original - April 2017; Revised - July 2018; Reviewed - June 2020, February 2023.

Version	Date	Notes
1.0	01 04 17	Minor amendments to the principles and public statement following consideration by Senate (1 st March 2017) and Council (13 th March 2017).
2.0	03 07 18	Revised: Minor revisions to meet the UEA standard for layout, to amend 'enterprise' to 'innovation', to clarify the scope of the Policy and to provide further guidance on exercising due diligence.
3.0	27 04 20	Scheduled review in 19/20: Minor revisions made including changing the order of Sections C1 and C2, and making the risks mentioned in Sections C1 and D2 consistent.
4.0	09 01 23	Scheduled review in 2022/23. The Policy has been revised to: <ul style="list-style-type: none">• clarify the researchers that the Policy applies to (A2).• underline that this is a university-wide Policy (A3).• add that an interim review of a decision taken may be scheduled as part of the acceptance process, particularly for longer and/or higher risk activities (E6) and to clarify that via the Policy, concerns can be raised after a decision has been taken (E4, F2).• include throughout that external collaborations must align with the principles of trusted research and that guidance and advice is available to assist this.• highlight throughout the requirement to ensure that any external collaborators are legitimate, regardless of the funding source for the activity.• update throughout the names of UEA organisational units and funding streams.

Background

This Policy outlines the principles within the University for considering proposed research and innovation activities and any associated external funding and collaborations to ensure that they are consistent with the University'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.

Review

This Policy will be reviewed and updated by the University Research Ethics Committee (UREC) and recommendations will be made to the University Research Executive, and thereafter to Senate before 31st July 2026.

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Part A. Introduction

- A1 This Policy outlines the principles within the University for considering proposed research and innovation activities and any associated external funding and collaborations to ensure that they are consistent with the University'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.
- A2 This Policy applies to:
- All staff employed by the University (including academic, research and support staff) carrying out research and/or innovation at, or on behalf of, the University (including those on a UEA contract/payroll but based elsewhere, for example at a Norwich Research Park (NRP) institution).
 - All postgraduate research students (including students registered at UEA but based elsewhere, for example at an NRP or other partner institution).
 - Any persons with honorary positions conducting research and/or innovation at, or on behalf of, the University.
 - Any other individuals carrying out research and/or innovation at, or on behalf of, the University.
- A3 Research and Innovation includes:
- Research activities and research training undertaken by the University's staff 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 the University's staff and registered postgraduate research students (including Innovation Catalyst and Innovation Development Funds).
 - Consultancy undertaken by the University's staff and registered postgraduate research students through UEA Consulting Ltd and UEA Enterprises Ltd.
 - Business, market development or other innovation activities undertaken by the University's staff and registered postgraduate research students through UEA Enterprises Ltd.
 - All of the above activities whether administered by the Research and Innovation Division or not.
- A4 The University takes pride in the excellence and breadth of its academic research and innovation activities and of the external funding it receives in support of these activities. Research and innovation activities and associated external funding are usually supported by the Research and Innovation Division (RID), and the Development and Campaigns Office (DAC) through the University's procedures and accounts or through UEA Consulting Ltd or UEA Enterprises Ltd. In reviewing and approving research and innovation activities undertaken by the University's staff and postgraduate research students - Research and Innovation Services, Postgraduate Research Service, the Development and Campaigns Office, academic management roles and Heads of School work within the authority delegated to them within the University'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 innovation activity or the source of funding when compared to the University'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.

- A5 To ensure our integrity, the University safeguards academic freedom, open inquiry, and debate in the best interests of education, enrichment, and personal and professional development. The University embraces human and intellectual diversity and inclusiveness.

Part B. Scope

- B1 The Policy applies to the issues surrounding the approval of research and innovation activities, collaborations, and their sources of funding. The Policy is intended to include the University's consideration of whether or not to approve very sensitive or high-risk types of studies. Consideration of the ethical issues surrounding the conduct of research and innovation activities itself is dealt within the University's *Research Ethics Policy*.

Part C. Principles and Public Statement

- C1 The University undertakes research, whether on its own or with third parties, that:
- is consistent with the University's goals;
 - meets the University's good practice guidelines of honesty, integrity, openness and accountability;
 - does not impose undue risk on the University and does not expose the University staff, students or participants in the University's research, or third parties, to any unacceptable risk, for example to their health and safety;
 - aligns with the principles of trusted research, for example protecting (i) intellectual property; (ii) sensitive research; and (iii) people and infrastructure, from potential theft, misuse and exploitation;
 - is consistent with the contractual terms of the University's relationship with staff, students, partners, research funders or donors; and
 - does not generate unacceptable real or perceived conflicts of interest.
- C2 The University only accepts funding and agrees to collaborations for research and innovation activities:
- that is from legal activities;
 - that will only be used for legal activities by University staff or students;
 - where funder and collaborator goals and values are consistent with those of the University as a charitable organisation;
 - where academic freedom, impartial or independent research, scholarship, training and teaching are safeguarded;
 - where intellectual property, sensitive research, people and infrastructure are protected from potential theft, misuse and exploitation;

- which do not generate unacceptable real or perceived conflicts of interest;
 - is consistent with the University's relationship with other donors, research funders, partners or students; and
 - which generates intellectual, reputational or financial value that is greater than the cost of administering the funding or collaboration agreement.
- C3 Whilst the University wishes to secure a range of funding sources and collaborate with a wide range of parties, it is the University's 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.
- C4 At any time, the University can review and reconsider previous decisions relating to the acceptance of funding or approval of collaborations and activities if subsequent events, legislative changes or the subsequent availability of additional information requires it.

Part D. The Procedure: For External Funding and Collaborations

- D1 This includes donations, and postgraduate research funding.
- D2 The Research and Innovation Services, Postgraduate Research Service, Development and Campaigns Office, Research Centres and UEA wholly owned subsidiaries are responsible for:
- ensuring that the identity of any source of funding direct to the University is clear (including any donations), as part of exercising due diligence. Where there is evidence to suggest that the actual source of funding may be different to that originally stated or if there are any other related issues of concern, further due diligence (for example, reviewing information from Companies House or The Charity Commission) 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.
 - providing advice and guidance to researchers in assessing risk associated with collaborations with external parties, and undertaking due diligence assessments to inform risk management decisions.
 - reviewing any terms and conditions associated with any offer of funding to ensure they do not impose undue risk on the University, and do not expose the University staff, students or participants in the University's research, or third parties, to any unacceptable risk, for example to their health and safety, protecting intellectual property, sensitive research, people and infrastructure from potential theft, misuse and exploitation.
 - following documented procedures in each service area for undertaking due diligence checks, seeking internal approval and authorising acceptance of funding and collaboration agreements on behalf of the University. This includes following usual governance routes of Heads of School and Directors of Divisions.
 - following the procedure outlined in Part F. below, in the event of any remaining area of doubt, prior to authorising any acceptance.

Part E. The Procedure: For Research and Innovation Activities

- E1 This includes activities funded by donations or with no external funding.
- E2 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.
- E3 Heads of School are responsible for:
- ensuring that the research and innovation activities of member staff and students including those undertaken in Research Centres are consistent with the principles and public statement in this Policy.
- E4 Research and Innovation Services, Postgraduate Research Service, Development and Campaigns Office, Research Centres and UEA wholly owned subsidiaries are responsible for:
- 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.
 - 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 Professional Services and the University's Research Ethics Committee.
 - providing advice and guidance to researchers in assessing risk associated with collaborations with external parties, and undertaking due diligence assessments to inform risk management decisions.
 - following the procedure outlined in Part F. below, in the event of any remaining area of doubt, prior to authorising any acceptance, and after a decision has been made.
- E5 At any time, the University can review and reconsider previous decisions taken in good faith relating to the acceptance of funding, engagement with collaborators, or approval of activities if subsequent events, legislative changes or the subsequent availability of additional information require it.
- E6 For certain research and innovation activities, for example those that are longer and/or of higher risk, an interim review of the decisions taken may be scheduled during the acceptance process.

Part F. The Procedure: For Resolving Areas of Doubt

- F1 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 the University Professional Service or UEA wholly owned subsidiary.
- F2 Concerns may be raised via this Policy regarding decisions already made, as noted above at E5 or following routine interim review (E6).
- F3 That summary shall be referred for consideration to the Pro-Vice-Chancellor for Research and Innovation for matters concerning the University or to the Chair of the Board of any subsidiary company for matters concerning the subsidiary company.
- F4 In considering the issues raised, the Pro-Vice-Chancellor for Research and Innovation or Chair of the Board as relevant may:
- request further due diligence be undertaken.
 - seek the advice of the Chair of the University Research Ethics Committee in instances of issues related to the conduct of research.
 - seek the advice of the Executive Team for all other issues.
 - seek the advice of the Council.
 - make a decision on behalf of the University or the Chair of the Board of any subsidiary company for matters concerning the subsidiary company.
- F5 The Pro-Vice-Chancellor for Research and Innovation 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.
- F6 A summary of any issues referred to the Pro-Vice-Chancellor for Research and Innovation shall be included in the University's Annual Research Integrity Report submitted to University Research Ethics Committee, Research Executive, the Senate and the Council. This Report provides general descriptions only and not detailed identifiable information.
- F7 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.