UNIVERSITY OF DUNDEE

RESEARCH GOVERNANCE & POLICY SUB-COMMITTEE

ANNUAL REPORT TO COURT

Academic Year 2014/15

1. Introduction

The primary objective of the Research Governance & Policy Sub-Committee is to ensure that the governance and policy context for the undertaking of research within the University is optimal. More specifically, the Sub-Committee is responsible for:

- reviewing governance processes and associated research and related policy extant at both University and the local level, and identifying need for improvement and development including the involvement of external stakeholders;
- establishing systems which accommodate the needs of good institutional governance, that are externally accountable and which take into account the diversity of the institution's research activities;
- ensuring that institutional research governance processes are transparent and are well communicated throughout the University;
- promoting "buy-in" by facilitating dialogue and dissemination of good and consistent practice across the colleges;
- attempting to minimize the burden of governance and policy demands on research staff commensurate with achieving high levels of internal and external confidence in the University's processes.

The Sub-Committee is chaired by Professor Alan Fairlamb, College of Life Sciences, and membership includes staff from across the Schools and the primary areas of research governance activity within the institution, including Safety Services, Tayside Medical Science Centre (TASC) Research Governance Committee, the University Research Ethics Committee (UREC) and the Welfare and Ethical Use of Animals Committee. The Sub-Committee meets three times during each academic year and reports to the University Research Committee (URC) with the minutes of its meetings included with URC papers.

This report summarises the activities of the Sub-Committee during academic year 2014/15.

2. Summary of Sub-Committee Business

(i) Policy Development and Review

Policy to Govern the Acceptance of External Research Funding: Following consideration of correspondence from the charity Medact in the 2013/14 academic session, the Sub-Committee agreed that the Policy to Govern the Acceptance of External Research Funding and the internal Project Registration Form (PRF) for grant applications should be strengthened in the subsequent academic year to ensure that researchers took personal responsibility for considering not only the potential benefits, but also any potentially harmful impacts, of their proposed research. This was accomplished by incorporating a new section in the Policy addressing the potential for dual-use research and the responsibilities of Principal Investigators undertaking research for which there is a tangible risk of misuse. A section on dual-use research was also incorporated into the PRF. Stating that there is a risk that the outcomes of a proposed project could be misused for harmful purposes on the PRF will not prevent an application being submitted, but will require the Principal Investigator to contact the Convener of

the University Research Ethics Committee (UREC) to agree a plan for the appropriate management of the risk before the research begins.

Policy and Procedures for Investigating and Resolving Allegations of Misconduct in Research: In response to a change in the annual reporting requirements of the Office of Research Integrity (ORI) in the USA, the policy was updated to incorporate specific procedures for dealing with allegations of research misconduct involving research supported by funding from the United States Public Health Service (USPHS). Allegations of research misconduct involving USPHS funds must now be reported directly to the Director of Academic and Corporate Governance, who will notify the ORI. The University will then work with the ORI to ensure that the process for responding to the allegation of research misconduct is consistent with U.S. federal regulations. It was also agreed that once the new School structure was implemented, references to the 'Head of Department' in the policy should be updated to 'Dean of School'.

Policy to Govern the Management of Research Data: The University's Policy to Govern the Management of Electronic Research Data was revised to take account of the increasing requirements from funders and governmental departments around data sharing. The principal amendments to the policy were:

- application of the policy to all research data, not just data covered by funder mandates;
- inclusion of physical (hard copy) as well as electronic data as funders' policies do not differentiate between the two;
- clarification that sensitive data is no longer automatically exempt (although exceptions may apply);
- requirement for joint research between commercial and non-commercial funders to ensure compliance with the data sharing requirements of the non-commercial funder;
- further clarification of where responsibility for data management lies, in particular the role of the Principal Investigator;
- specifying that the costs of data management should be included in grant applications whenever possible;
- an expectation that data is made available as soon as possible (whilst acknowledging the appropriate use of embargos);
- expansion of the Library & Learning Centre's responsibilities to include the central recording of data sets and the provision of Digital Object Identifiers (DOIs) for their long term identification.

It was agreed that subject repositories are often the best place to store data and that the University's Pure research information management system would be used as a permanent central record of where the data is stored.

In considering a response to RCUK's draft Concordat on Open Data, the principles and intentions of which were generally welcomed, the Sub-Committee recognized that there was a significant cost burden associated with the implementation of open data and the University would need to invest in appropriate supportive infrastructure (e.g. IT infrastructure, specialist support staff, researcher training) to ensure compliance.

The Use of Animals in Research in the University of Dundee: The University's public-facing document on the use of animals in research was updated by the inclusion of a new section on compliance which made it clear that the University expects very high standards of behaviour from staff involved in the use of animals in research.

Publication Policy: It was agreed that an overarching publication policy, pulling together currently separate components, would be desirable. This would include reference to Open

Access, Ghost Writing, Plagiarism, image manipulation and ORCID with cross-reference to the Research Data Management Policy. This will be developed further in 2015/16.

Use of Human Tissue in Art: Prompted by the LifeSpace exhibition "Material Concerns", which explored consent in donation and use of human tissue in life, art and scientific research, the Sub-Committee considered the consent process and ethical framework for the use of human tissue in art. It was agreed that the TASC Research Governance Committee was best placed to consider issues associated with human tissue, personal data, consent and safety in this context and would therefore take responsibility for considering ethics and governance issues relating to the use of human tissue in art.

(ii) Concordat to Support Research Integrity

A research environment which provides suitable learning, training and mentoring opportunities for researchers is a key requirement for embedding a culture of research integrity (commitment 3 of the Concordat). In this respect, in conjunction with OPD and an external consultant, the Sub-Committee has overseen the development of six online videos to promote researcher awareness and engagement with research integrity issues. Feedback was provided at all stages from initial outlines, to detailed outlines, final scripts and video production. Additional resources (multiple-choice quizzes to assess and reinforce understanding; booklets incorporating transcripts, case studies, and references to external resources; facilitator's notes to help with discussion of case studies) have also been under development. The resource is more comprehensive, and has taken longer to develop, than originally envisaged and hence development has continued into the 2015/16 academic session. The videos and associated resources will be hosted in the University's Virtual Learning Environment with piloting expected in spring 2016. Several other universities have shown interest in licensing the resource.

The training is expected to be particularly beneficial to postgraduate research students and early career researchers. A proposal to make the training mandatory for new postgraduate research students will be considered by Research Degrees Committee.

(iii) Research Misconduct

The University was involved in one formal investigation of alleged research misconduct within the 2014/15 academic year, involving a former member of staff. This was a continuation of a joint investigation led by another University which started in 2013/14. The investigation concluded that the member of staff was not guilty of any academic fraud or misconduct.

(iv) Reporting to the Sub-Committee

The Sub-Committee's remit does not require it to capture detailed information on activities at the local level but rather to satisfy itself, by reviewing higher level evidence, that sufficient rigour exists in the policies and processes operated by the institution. The Sub-Committee therefore receives and considers annual reports from the various areas of research governance operating across the University to ensure that the appropriate policies and processes are in place. Reports for calendar year 2014 were received from the TASC Research Governance Committee; University Health and Safety Sub-Committee¹; University Research Ethics Committee; and the Welfare and Ethical Use of Animals Committee:

Health and Safety Committee: The committee had reviewed a large number of policies during the reporting period and developed a new policy for safety arrangements at public events. More online training was being introduced with the aim of achieving 100% compliance for completion

¹ Since renamed the Health, Safety & Welfare Committee.

of on-line induction training by new staff. A fundamental review of how health and safety would be managed within the new school structure was underway. The Sub-Committee approved the report, noting that changes in the management of health and safety will occur as the new school structure becomes established.

TASC Research Governance Committee: Three policies had been reviewed during the reporting period and other reviews were planned for 2015, indicating an active process. A Medicines & Healthcare Products Regulatory Agency (MHRA) Good Clinical Practice (GCP) inspection was conducted in March 2014, the findings of which were actioned and completed by the end of 2014 (additional documentation to support this statement was requested and provided). The Sub-Committee agreed that the policies and processes reported were up to date and fit for purpose and approved the report.

University Research Ethics Committee (UREC): A new structure was being developed for UREC and would be further developed and implemented once the new University structure had been implemented. This would devolve greater responsibility for review of applications for ethical approval to School-level sub-committees with UREC taking overarching responsibility for development, review and implementation of procedures as well as introducing audit procedures. The Sub-Committee accepted that the current structure and operation of UREC (whereby the burden of reviewing applications for ethical approval falls disproportionately on the Convener) is unsustainable, and approved the report.

Welfare and Ethical Use of Animals Committee: All policies within the committee's remit had been reviewed and updated in the reporting period and further detailed guidance on compliance and training was planned for 2015. The Sub-Committee agreed that the policies and processes reported were up to date and fit for purpose and approved the report.

Professor Alan Fairlamb Convener 03 February, 2016