University Court
Research Governance & Policy Sub-Committee: Annual Report

4 February 2022

Academic Years 2019/20 and 2020/21

Introduction

1. 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:

    1.1 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;

    1.2 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;

    1.3 ensuring that institutional research governance processes are transparent and inclusive and are well communicated throughout the University;

    1.4 promoting "buy-in" by facilitating dialogue and dissemination of good and consistent practice across the Schools;

    1.5 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.

2. Professor Alan Fairlamb, who has chaired the Sub-Committee since it was established in 2010, stepped down from the Sub-Committee in late 2020, having made a major contribution to research governance, policy and integrity at both a School and University level. In January 2021, Dr Beth Hannah, Convenor of the University Research Ethics Committee, kindly agreed to act as Interim Convener of the Research Governance & Policy Sub-Committee until a new permanent Convenor could be appointed[1]. Membership of the Sub-Committee includes staff from across the Schools and the primary areas of research governance activity within the institution, including the Health, Safety and Welfare Committee, Tayside Medical Science Centre (TASC) Research Governance and Oversight Committee, the University Research Ethics Committee (UREC) and the Welfare and Ethical Use of Animals Committee. The Sub-Committee normally meets three times during each academic year and reports to the University Research & Knowledge Exchange Committee (RKEC) with the minutes of its meetings included with RKEC papers.

3. Subsequent to an interim report covering academic year 2019/20 presented to Court in February 2021, this report provides a fuller account of the activities of the Sub-Committee, and associated research integrity initiatives, during academic years 2019/20 and 2020/21.

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[1] Professor Inke Nathke, Associate Dean for Professional Culture in the School of Life Sciences, became the Convenor in January 2022.

4. The Sub-Committee considered a range of issues in the reporting periods, a number of which are expanded on below along with actions and activities that support the University's commitment to the Concordat to Support Research Integrity and a summary of the annual reports from the areas of research governance across the University that report to the Sub-Committee.

Concordat to Support Research Integrity

5. The actions and activities reported below aim to facilitate the development of a research environment that is underpinned by a culture of integrity and based on good governance, best practice and support for the development of researchers (consistent with commitment 3 of the Concordat).

6. **Researcher Training:** The University provides online research integrity training, *Responsible and Ethical Practice in Research and Publication*, for both staff and students. Updates to the training developed in 2019-2020 were implemented in January 2021. These included: a number of small revisions to reflect changes in the external research environment and to align with the revised Concordat to Support Research Integrity released in late 2019; a significant revision to and expansion of the section on data protection, particularly with respect to the General Data Protection Regulation; and improvements to accessibility. Since 2016 all postgraduate researchers (PGRs) have been required to complete the training prior to their upgrade review. In September 2020, the Doctoral Academy Board endorsed the recommendation that the training also be made mandatory for supervisors of PGRs; this requirement was communicated to supervisors in February 2021, following implementation of the update. Compliance is being monitored and reported to the School PGR Lead and Research Integrity Lead(s). A number of other higher education institutions used the resource under license from the University of Dundee in the 2019/20 and 2020/21 academic years.

7. The online training has been supplemented by: annual workshops for staff and PGRs provided by an external consultant; an inaugural research integrity mini-conference in January 2021 that attracted over 70 PGRs and covered supervisor/PGR relationships, reproducibility, record keeping and research integrity processes, with speakers from Dundee and two other institutions; promotion of attendance at UK Research Integrity Office webinars; and School-level activities led by Research Integrity Leads and Advisors (see below).

8. **Research Integrity Leads and Advisors:** At University-level, the member of staff with responsibility for overseeing research integrity is the Convener of the Research Governance & Policy Sub-Committee. At School level, Research Integrity Leads and Advisors play a key role in promoting a culture of research integrity, with larger Schools having Research Integrity Groups (RIGs) which meet regularly. Leads and Advisors provide independent impartial advice on the responsible conduct of research to staff and students, including those who may be considering making an allegation of research misconduct. Staff and students may approach a Lead or Advisor from another School, for example, where they perceive that their own Research Integrity Lead/Advisor has a conflict of interest in the matter they wish to discuss.

9. Research Integrity Leads came together as a University-wide network about three times a year to discuss their experiences and share best practice prior to 2020. This interaction stalled following the disruption caused by COVID-19 but is expected to resume in an expanded form (including Advisors) in 2022.

10. **Research Ethics Procedures:** The ethical review and approval of non-clinical research involving human participants proposed by staff and students is overseen by six School/joint Research Ethics Committees (SRECs), under the oversight of the University Research Ethics Committee (UREC). Further information on the activities of UREC during the reporting period can be found in paragraphs 18.5 to 18.7.

11. **Research Governance and Policy Handbook:** The Research Governance and Policy Handbook brings together information on research governance and policy, including the Concordat to Support Research Integrity, in one place. This includes a new Policy to Govern the Publication of Research which outlines requirements for the publication process and associated dissemination, archiving, and recording of research. The new policy subsumed two previously separate policies on guest authorship and ghostwriting. The Open Access Policy was also updated to an Open Research Policy, covering open access to both research outputs and research data. These policies can be found in the Policy roadmap section of the Handbook. Expected future additions to the Handbook discussed during the reporting period include guidance on the Nagoya Protocol.

12. **ReproducibilityTEA:** ReproducibilityTEA journal clubs bring together early career researchers who are interested in improving research practices to discuss reproducibility and open science. In January 2021, a University of Dundee postgraduate researcher with an interest in reproducible research briefed the Sub-Committee on their proposal to set up a Dundee ReproducibilityTEA journal club. Members fully supported this initiative and the journal club began meeting in June 2021.

13. **Postgraduate Research Experience Survey:** In the Postgraduate Research Experience Survey run by Advance HE (March to May 2021), 93% of students stated that their understanding of 'research integrity' has developed, 7% above the Global benchmark. This was in the context of a high response rate for the survey (54%, compared to an overall response rate of 36% from the 94 participating institutions), reflecting excellent promotional activities undertaken by the Doctoral Academy.

14. **Scottish Research Integrity Network (SRIN):** The University is a member of the Scottish Research Integrity Network, which it co-founded with the University of Edinburgh. The network, which aims to share knowledge and best practice in research integrity, had a well-attended inaugural meeting in the 2019/20 academic year and has set up a Teams site to enhance collaboration and support future meetings.

Reporting of Clinical Trials Results

15. The 2018/19 annual report noted that actions initiated in TASC by the then Director of R&D (NHS Tayside), a Professor of Cardiovascular Medicine & Therapeutics in the School of Medicine and a member of the Sub-Committee, had resulted in the University of Dundee being listed as the university with the highest proportion of clinical trials results reported (82%) on the EU Clinical Trials Register[2]. The Sub-Committed noted at the time that the target would be to reach 100% compliance with reporting requirements; the EU Trials Tracker shows that the target was subsequently met.

San Francisco Declaration on Research Assessment

16. As a signatory to the San Francisco Declaration on Research Assessment (DORA), the University has committed to the responsible use of research metrics in assessing research outputs and appointment and promotion decisions. As a starting point, REF Groups involved in the selection of outputs were instructed not to use journal impact factors or any hierarchy of journals in their assessment of outputs in the University's REF 2021 Code of Practice and a webpage outlining the University's commitment to implementing the DORA principles was published. The Sub-Committee noted that cultural change would be required, which may be more challenging in certain disciplines, and endorsed the establishment of a

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[2] Goldacre, B., *et al.* "Compliance with requirement to report results on the EU Clinical Trials Register: cohort study and web resource", BMJ 2018;362:k3218 http://dx.doi.org/10.1136/bmj.k3218.

DORA Working Group. Further progress on implementation was limited during the COVID-19 pandemic and REF preparations but will be taken forward by a DORA Working Group in 2022.

PubPeer

17. The University has maintained its institutional subscription to [PubPeer](#), an online platform for post-publication peer review where scientists often comment (usually anonymously) on the quality and integrity of published papers, including potential research misconduct. The vast majority of comments relate to concerns over potential image manipulation in the results of biological and medical research reported in journal articles. The School of Life Sciences follows up notifications from PubPeer through its Research Integrity Group, alerting Research Integrity Leads in other Schools or external authors as necessary, with the aim of maintaining the integrity of the scientific record (including correction of honest errors and initiating investigations of potential research misconduct) should the concern be substantiated. Where e-mails raising similar concerns are received from a person (or persons) using a pseudonym they are relayed to the relevant Research Integrity Lead and followed up in a similar fashion.

Research Misconduct

18. As described in the interim report for academic year 2019/20, one formal investigation of research misconduct was completed in 2019/20; a member of staff was found to have committed research misconduct. Another formal investigation of potential research misconduct by a member of staff was initiated towards the end of the 2020/21 academic year; the outcome of the investigation will be included in the annual report for 2021/22.

Reporting to the Sub-Committee

19. 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 (both written and oral) for academic years 2019/20 and 2020/21 were received from the University Health, Safety and Welfare Committee; Tayside Medical Science Centre (TASC) Research Governance Committee; University Research Ethics Committee; and the Welfare and Ethical Use of Animals Committee:

    19.1 **Health, Safety and Welfare Committee**: As part of its remit, the Health, Safety and Welfare Committee covers health and safety issues arising from all research activities undertaken by the University and reports to the People and Organisational Development Committee, which approves any new policies. Plans to undertake an exercise of consolidation, updating and rationalisation of the 62 policies that support the main Health and Safety Policy in 2020 had been put on hold due to the COVID-19 outbreak, which had an enormous impact on this area of governance. However, the main Health and Safety Policy and Display Screen Equipment policies were reviewed and some existing policies (including First Aid; Fire Safety; and Travelling on University Business) had supplementary guidance added to address safety measures relating to COVID-19. Guidance had also been issued for a hybrid working trial. The Sub-Committee approved the annual reports.

    19.2 **Tayside Medical Science Centre (TASC) Research Governance and Oversight Committee**: The TASC Research Governance and Oversight Committee provides oversight of the systems and processes that exist in clinical research to ensure that the required standards are met. The

Committee is responsible for providing assurance to the NHS Tayside Clinical Care & Governance Committee that clinical research is undertaken in a manner that shows evidence of accountability, responsibility, compliance with standards and management of risk. The Director of Research and Development, NHS Tayside, and the Convener of the TASC Research Governance and Oversight Committee are members of the Sub-Committee

19.3 There were nine policies under the remit of TASC by the end of the reporting period, underpinned by a number of Standard Operating Procedures (SOPs) and templates, with scheduled review dates set for those policies not reviewed and updated in the previous 12 months. Two new policies had been introduced, one on co-enrolment (the process of consenting participants into more than one research project) the other on the selection and oversight of vendors (third parties providing services) for clinical research. The policies and SOPs were available on the TASC website which had been upgraded to a more user-friendly layout.

19.4 The impact of COVID-19 had been very challenging, with clinical trials taking place in much shorter time periods than normal and the need to manage the expectations of researchers when paused studies and new studies were waiting to start. The greatest pressure was in research governance where another post was required to support increased activity, not only in the School of Medicine but increasingly in other Schools across the University.[3] The TASC Quality Assurance team carried out a number of internal audits and reviews during the reporting period. The pandemic required a shift to filing documents electronically rather than printing and filing paper documents. No major findings were identified during the audits. The Sub-Committee supported the case for a new post and approved the annual reports.

19.5 **University Research Ethics Committee (UREC)**: UREC is responsible for upholding the ethical standards of practice in non-clinical research involving human participants in the University in order to protect participants and researchers from harm, preserve participants' rights, and to provide reassurance to the public and funders regarding the ethical conduct of research at the University. It provides oversight, monitoring and guidance to the six School Research Ethics Committees (SRECs), three of which are joint committees covering two or three Schools, and acts as the first point of contact for the review and approval of proposals to access and use security-sensitive material.

19.6 Given that updates to procedures and guidance first introduced in 2016 had been completed (in response to feedback) in the 2018/19 academic year, the principal changes in procedures related to those required to mitigate the impact of the COVID-19 pandemic[4]. These included procedures that were implemented following lockdown for pausing or, where possible, granting rapid amendments to projects involving face to face research to enable them to proceed remotely, along with additional guidance on appropriate platforms to support remote interactions with participants. Additional meetings of UREC (outwith the normal cycle) were held in both 2020 and 2021 to receive feedback from School Research Ethics Committees on the operation of the new procedures and agree (in consultation with the Head of Health and Safety) further updates to the procedures and guidance in light of the evolving situation.

19.7 An annual reporting system for SRECs implemented in late 2019 has now become embedded. Other UREC activity during the reporting periods included development of guidance for module level and group applications for ethical review (where there are a number of low risk projects

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[3] A new post was approved in December 2021.
[4] COVID-19 Update webpage: https://www.dundee.ac.uk/research/governance-policy/ethicsprocedures/covid/

which are substantially similar with a single named point of contact overseeing all of the projects) and for using social media for recruitment of research participants. Additionally, a working group was formed to undertake a root and branch review of the Code of Practice for Non-Clinical Research Ethics on Human Participants; a fully revised version of this document is expected to be released as a policy in 2022. The Sub-Committee approved the annual reports.

19.8 **Welfare and Ethical Use of Animals Committee**: The Welfare and Ethical Use of Animals Committee (WEAC) acts on behalf of the University Court in ensuring that the University meets its obligations under the Animals (Scientific Procedures) Act 1986 (amended 2012) to discharge the functions of an Animal Welfare and Ethical Review Body as required under that Act, and to determine policy on all matters relating to animals on University premises. The Committee reports to Court after each of its quarterly meetings.

19.9 The WEAC's two key documents, the Terms of Reference and the University Policy for the Use of Animals in Teaching and Research (formerly the Code of Practice for the Use of Animals in Teaching and Research), were both reviewed and updated in the reporting period.

19.10 Due to a new way of working introduced by the Animals in Science Regulation Unit (ASRU) at the Home Office, the 'local' Home Office inspector would no longer attend meetings of the Committee as they had done previously; instead an audit would take place every three years. This would mean that the informal feedback from the regulator as to the effectiveness of the Committee would be lost. However, Committee members participate in a Scottish Animal Welfare Ethical Review Body Hub, which shares common experience and best practice. The Sub-Committee approved the annual reports.

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Interim Convener (2021)
4 February 2022