



STRANMILLIS UNIVERSITY COLLEGE  
A College of Queen's University Belfast

## Code of Ethics in Research

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	Approved by Governing Body	November 2015	
2	Introduction of GDPR and restructuring of senior staff	February 2018	Director of Research and Scholarship
3	Periodic review	June 2021	Director of Research and Scholarship
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## 1. Introduction

- 1.1. The College has a responsibility to ensure that all research carried out under its auspices is conducted to the highest standard achievable, in accordance with the law and public interest. This means that all members of the College, involved in the research process should exhibit impeccable integrity and follow the principles of good research practice.
- 1.2. The College supports the Universities UK (UUK) [Concordat to Support Research Integrity](#) which provides a framework for good research conduct and governance. In supporting the five key principles identified in the Concordat, which apply to all fields of research, we are committed to:
- upholding the highest standards of rigour and integrity in all aspects of research;
  - ensuring that research is conducted according to the appropriate ethical, legal and professional frameworks, obligations and standards;
  - supporting 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;
  - using transparent, robust and fair processes to deal with allegations of research misconduct should they arise;
  - working together to strengthen the integrity of research and to review progress regularly and openly.
- 1.3. This document addresses the issues involved in the proper conduct of research, and provides guidance on the standards expected. This cannot, however, be an exhaustive document and the *Code of Ethics in Research* is to be viewed as the minimum standard with which College staff and research students should comply. The lack of mention in this code of a particular act or omission should not be taken as conclusive on any question of professional conduct, should an enquiry arise.
- 1.4. The College expects all staff and research students to work within the *Code of Ethics in Research*. If they have any doubt concerning the applicability of a particular section of the *Code of Ethics in Research* they should consult the Research Office.
- 1.5. The Code of Ethics in Research should be read in conjunction with other documents, especially the Stranmillis Research Ethics Policy and Procedures and the [Regulations Governing the Allegation and Investigation of Misconduct in Research](#).
- 1.6. The *Code of Ethics in Research* applies to:
- researchers (including academic staff, research assistants, and academic related staff) and other staff involved in the research process (including technical, clerical, academic related and administrative staff)

employed by the College, whether involved in the research process within the College, or whilst at another institution;

- students undertaking research and their supervisors;
- any persons with honorary positions involved in research within, or on behalf of, the College.

1.6.1. The term researcher has been used for convenience throughout this *Code of Ethics in Research* and can be taken to refer to any or all of the above categories, as is appropriate.

1.7. The *Code of Ethics in Research* may be supplemented or updated from time to time by additional guidance notes on specific areas.

1.8. Failure to comply with the *Code of Ethics in Research* may result in actions being taken under the [Regulations Governing the Allegation and Investigation of Misconduct in Research](#).

## **2. Principles of good research practice**

2.1. The College cannot be prescriptive about individual approaches taken by researchers to solving particular research questions. However, in the conduct of all research, the College expects the following general principles to be complied with.

2.2. Good research practice includes the following aspects:

- maintaining open, honest and fair standards, including ready questioning of the researcher's own findings and proper attribution of the contribution made by others;
- leadership, organisation and co-operation in research, including appropriate supervision and mentoring of young researchers;
- appropriate recording (including the storage of data) maintenance and reporting of research, allowing ready verification of the quality and integrity of the research data;
- appropriate dissemination, application and exploitation of the research findings, including negative results;
- compliance with relevant regulations or policies, whether legal, institutional or other, which govern particular aspects of research or the involvement of children and vulnerable adults;
- participation only in work which conforms to accepted ethical standards and which ensures the safety of all those associated with the research;
- participation only in work which the researcher is competent to perform;
- avoidance or declaration of real or apparent conflicts of interest;
- strict maintenance of the confidentiality of all those involved where appropriate.

### **3. Integrity**

- 3.1. Researchers should be honest in their own actions in research and in their responses to the actions of other researchers. This applies to all aspects of research work, including experimental design, research ethics, generating and analysing data, applying for funding, declaring conflict of interest, publishing results, and acknowledging the direct and indirect contribution of colleagues, collaborators and others.
- 3.2. All individuals in the College's employment, or working within the College, must refrain from plagiarism, piracy, the fabrication of results or other forms of research misconduct.
- 3.3. The College expects the quality of research results to be assured before being made public. It is important that ideas can be challenged and tested without loss of reputation. Equally, it is important that researchers or research groups should not become subject to commercial pressures. Researchers must have a critical and impartial approach to results including not rejecting results that are perceived to be negative or are unexpected and not in accordance with the hypothesis tested.
- 3.4. The College is committed to the highest standards of openness, accountability and integrity. As such, individuals who believe they have discovered malpractice or impropriety should refer to the College's [Regulations Governing the Allegation and Investigation of Misconduct in Research](#), and the [Whistleblowing Policy and Procedures](#), both available on the College website. If there are more appropriate procedures available for addressing concerns raised then the individual will be advised accordingly (e.g. for allegations of fraud the College's [Anti-Fraud and Bribery Policy](#) would be more appropriate).
- 3.5. The College takes seriously any allegation of research misconduct. Any member of the College who believes that an act of research misconduct has occurred or is occurring should bring this to the notice of the College. An individual or individuals with concerns about possible misconduct in research by a member of the College should raise the issue in writing to the Director of Research and Scholarship. All such allegations will be dealt with under the procedures detailed in the [Regulations Governing the Allegation and Investigation of Misconduct in Research](#) .

### **4. Openness**

- 4.1. While recognising the need for researchers to protect their own research interests in the process of planning their research and obtaining their results, the College encourages researchers to be as open as possible in discussing their work with other researchers and with the public.
- 4.2. Once results have been published, where appropriate, the College expects researchers to make available relevant data and materials to others, on request. This is, of course, provided that this is consistent with any ethics

approvals and consents which cover the data and materials and any intellectual property rights (IPR) in them.

## **5. Leadership and cooperation**

- 5.1. It is the responsibility of the Senior Leadership Team to ensure that an environment is created which allows research to be conducted in accordance with good research practice.
- 5.2. These individuals are responsible for establishing a research climate of mutual cooperation, in which researchers at all levels are encouraged to develop their skills and in which the open exchange of ideas is fostered.
- 5.3. A research community should be promoted and encouraged in which discrimination based on gender, race, age, disability, sexual orientation, religious affiliation, political or scientific viewpoint, ethnic or national origin does not occur.
- 5.4. Research misconduct is least likely to arise in an environment where good research practice prevails and where there is adequate supervision at all relevant levels. It is a responsibility of all staff to promote, develop, encourage and implement the standards and protocols for research advanced in the College's *Code of Ethics in Research* throughout the College, and to ensure adherence to those standards is a matter of course.

## **6. Free and Informed Consent**

- 6.1. When recruiting research participants, the most important principle is that of free and informed consent. While the form of consent may vary according to the circumstances, informed consent generally requires the participant to:
  - Have the capacity to consent;
  - Have been provided with all information regarding the research that may affect their willingness to participate. This must be provided (normally as a participant information sheet) in a language that is clear and easy to understand;
  - Have been made aware that participation is voluntary and that they may withdraw at any time. This includes the right, in the light of experience of the investigation or as a result of debriefing, to withdraw retrospectively any consent previously given and to require that their own data, including recordings or material, be destroyed. However, the right to withdraw consent retrospectively has limitations - for example, it cannot be fully given after a report has been published. Also, in some circumstances the right of the participant to withdraw consent may be outweighed by the public or scientific interest of the relevant information. It should be made clear to participants at what point, if any, they are no longer able respectively to withdraw their participation;

- Have understood that not participating or withdrawing will have no effect on their subsequent treatment or standing;
  - Have been asked to participate without undue pressure or inducement. It is important to recognise the extent to which research participants may be inconvenienced, and that they should be appropriately rewarded for this, e.g. payment of travel expenses. However, payment of participants should not be used to induce them to risk harm beyond that which they risk without payment in their normal lifestyle;
  - Have understood they may ask questions and receive answers regarding their participation.
- 6.2. Researchers must be mindful when seeking consent of any requirements outlined by their funding body (if applicable) regarding the sharing, archiving and re-use of data once confidentiality, by removing identifiers and personal data, has been assured.
- 7. Research Involving Children, Vulnerable Adults or Dependent Persons**
- 7.1. In circumstances where the participant is legally incapable of providing consent or is a minor, the researchers should:
- Explain the research and the participants' role and requirements;
  - Seek the participants' agreement;
  - Ensure the person's best interests are served;
  - Obtain assent from the participants' legal guardian.
- 7.2. Any research involving children should comply with Articles 3 and 12 of the United Nations Convention on the Rights of the Child. Article 3 requires that in all actions concerning children, the best interests of the child must be the primary consideration. Article 12 requires that children who are capable of forming their own views should be granted the right to express their views freely in all matters affecting them, commensurate with their age and maturity. Children should therefore be facilitated to give fully informed consent.
- 7.3. Any member of staff or student intending to undertake research with children should adhere to the guidance in the College's [Child Protection and Safeguarding Policy](#), the Department of Education's (2020) [Safeguarding and Child Protection in Schools](#), the Safeguarding Board of NI's (2017) [Regional Core Child Protection Policy and Procedures](#), the [Safeguarding and Child Protection](#) section of the EA website, the [Children \(NI\) Order 1995](#) and the overarching policy framework for safeguarding in all settings: [Co-operating to Safeguarding Children and Young People](#) (DHSSPS, 2017).
- 7.4. A vulnerable adult may be someone who is incapacitated, or a dependent person. Particular care should be exercised when conducting research involving vulnerable groups or dependent persons, to ensure that they have not been subjected to undue influence to participate. Their decision to

participate may be influenced by their reliance on those who may be requesting or offering their participation in research. Such persons include: students; those deprived of their liberty; recipients of health care dependent on their health care provider for continued care; those in military service; health care workers or other employees (particularly those in junior positions).

- 7.5. Whilst all human beings enrolled in research may be said to be vulnerable to harm, as research, by definition, involves a level of uncertainty, some individuals may be more vulnerable than others to the risk of being treated unethically in research. Potential research participants can be classified as vulnerable due to cognitive, situational, institutional, deferential, medical, economic, and social factors.

## **8. Supervision and mentoring**

- 8.1. It is the responsibility of established researchers, to nurture the appropriate intellectual, technical, ethical and career development of new staff, students and supervisees.
- 8.2. Supervisors are responsible for the overall progress of their students, and should follow good supervisory practice. Supervisors and postgraduate students should be familiar with all applicable sections of the College Calendar: General Regulations, in particular, the Regulations for Postgraduate Students and Regulations for Undergraduate Students.
- 8.3. Researchers who are new to the research community may face particular difficulties. Responsibility for ensuring that students and other new researchers understand good research practice lies with all members of the research community, but particularly with the Director of Research and Scholarship, Heads of Academic Areas, grant holders and supervisors. Good practice should include mentoring young researchers in their new environment.
- 8.4. The College is committed to ensuring researchers are skilled and equipped to complete their research. All researchers should receive appropriate training, for example in research design, regulatory and ethics approvals and consents, equipment use, confidentiality, data management, record keeping and data protection.
- 8.5. The College has signed up to the [Concordat to Support the Career Development of Researchers](#) and is committed to improving the employment and support for researchers and researcher careers in the College. A [Concordat Implementation Plan](#) is reported on annually to the College's Research and Scholarship Committee.

## **9. Commitment to competency**

- 9.1. Researchers are responsible for actively maintaining professional competency and remaining knowledgeable within their areas of expertise.



To this end researchers should conduct their work within the scope of their own training and knowledge base.

- 9.2. Researchers should not claim any level of competence that they do not possess, and should take all reasonable steps to ensure that their qualifications, capabilities or views are not misrepresented by others. If this should occur they should take necessary steps to correct any such misrepresentation.
- 9.3. Researchers should also ensure that all persons who assist in the conduct of their research are adequately trained and perform their responsibilities competently.

## **10. Documenting results and storing primary data**

- 10.1. Confidentiality of personal data relating to research participants is essential and it is of paramount concern that this is protected. All personal information must therefore be encoded or made anonymous as far as is possible, and as early as possible after collection. Confidentiality is dealt with further below (see section 12).
- 10.2. The researcher should clarify at the outset of the research programme any issues regarding the ownership of the data used or created in the course of the research and also the results of the research. Any issues regarding ownership of these should be resolved before the research commences.
- 10.3. Throughout their work, researchers are required to keep clear and accurate records of the research procedures followed and of the results obtained, including interim results. This is necessary not only as a means of demonstrating proper research practice, but also in case questions are subsequently asked about either the conduct of the research or the results obtained. It also is important in the process of protecting intellectual property rights.
- 10.4. Data generated in the course of research must be kept securely, as appropriate and back-up records should always be kept for data stored electronically. Data should be stored in such a way that permits a complete study reconstruction, if necessary, and records should be monitored regularly to ensure their completeness and accuracy. See the College's [Information Security Policy](#)

The College is also committed to adherence to the General Data Protection Regulation (GDPR) which has effect from 25 May 2018. Under the GDPR consent must be “unambiguous” and specific to the processing operation. Further processing of research data can only be considered if specific safeguards are implemented (see Article 89) such as pseudonymization. Anonymised data falls outside the scope of the GDPR and is defined as data which cannot be identified by any means “reasonably likely to be used...either by the controller or by another person” (Recital 26). Article 12(1) requires controllers to “take appropriate measures” to inform data



subjects of the nature of the data processing activities and their available rights. Controllers must provide this information, irrespective of whether consent is the basis for processing, “in a concise, transparent, intelligible and easily accessible form, using clear and plain language” (Article 12(1)). GDPR specifies that when data is first collected, notice should be given which includes the controller’s identity and contact information, the purpose of the data processing activities, and if the data will be transferred to any other body. In addition, Article 13 (2) requires a controller to provide notice of the data subject’s rights to access, rectification, erasure and to object to processing, as well as notice of “the period for which the personal data will be stored, or if that is not possible, the criteria used to determine that period.”

- 10.5. The College normally expects primary data to be securely held for a minimum period of 5 years after the completion of a research project. However, researchers must be aware of and comply with any specific requirements of the funding body relating to longer periods of data retention. It is the responsibility of the Principal Investigator to ensure that data retention meets with the requirements of the funding body.
- 10.6. If a member of staff leaves the College, for whatever reason, before the required period of data retention expires, they have a responsibility to ensure that the data is securely held, either by the College, or if agreed to by the College may be held by themselves or transferred to another institution/establishment.

## **11. Intellectual Property Rights and ownership**

- 11.1. IPR include patents, registered designs, copyright, design rights and know-how. Creative work, including research and development, can lead to IPR and some of these can be protected under one or more headings.
- 11.2. In patent law, the IPR created during an employee’s normal or specifically assigned activities belongs to the employer. This means that most of the IPR arising from the activities of College teaching and research staff belongs to the College.
- 11.3. Where work is being carried out under contract from an outside organisation, specific provisions about IPR may apply. For instance, the College may be requested to assign its rights to the sponsor, usually in exchange for some benefit.
- 11.4. In any circumstances where a researcher feels there is any ambiguity or uncertainty regarding IPR then the researcher should seek advice from the Research Office.

## **12. Confidentiality**

- 12.1. Researchers must ensure the confidentiality of personal information relating to the participants in research, and that the research fulfils any related legal

requirements, such as those of the Data Protection Act 1998 or (from 25 May 2018) the General Data Protection Regulation (GDPR). Researchers must adhere to the College's [Information Security Policy](#).

- 12.2. Researchers who have access to confidential information of the College, or information from other parties to whom the College has an obligation of confidentiality, must not disclose such information without the prior consent of the College. Confidential information may include, but is not limited to, protocols, processes, techniques, computer readable software, data, drawings or documents.
- 12.3. As noted above (section 10.1) confidentiality of personal data relating to research participants is essential, and therefore personal information must be encoded or anonymised as far as possible and as early as possible after collection. Even with anonymised data, care must be taken to ensure that any variables or combination of variables, particularly group or location identifiers, cannot lead to the identification of individuals (or small groups of individuals). This is of paramount importance when dealing with vulnerable groups.
- 12.4. When seeking consent from potential participants, researchers should inform them of measures taken to ensure their confidentiality and to protect their anonymity. They should also make clear any potential limits associated with these measures.
- 12.5. Whilst researchers must endeavour to honour guarantees of privacy and confidentiality, there are circumstances where these guarantees may be over-ridden. In particular:
  - 12.5.1. In research involving children, should the researcher have any concerns regarding the safety or well-being of a child participant, they have a duty under the Children Order (NI) 1995 to report their concerns to a relevant authority;
  - 12.5.2. Where there is sufficient evidence for the researcher to have serious concerns about the safety of a participant (adult or child) or about others who may be at significant risk because of the behaviour of that participant, then they have a moral obligation to inform an appropriate third party;
  - 12.5.3. Information provided in confidence to a researcher does not enjoy legal privilege, and may be liable to legal subpoena in court, under section 5 of the Criminal Law Act (NI) 1967. In most instances this will not be an issue that is likely to arise, but where it is a potential issue, the possibility should be explained to the participants.

### **13. Conduct of reviewers/referees**

- 13.1. Peer review requires that the reviewer/referee be expert in the subject under review or the methodology to be used. If a researcher considers themselves to be insufficiently expert in the area on which they have been

asked to comment, they must make this clear, and would normally be expected to return the material unread.

- 13.2. A researcher asked to serve as a reviewer/referee should declare any possible conflict of interest, whether real or perceived, such as competitive, collaborative or other close relationship with one or more of the authors under review, or a close professional or commercial interest in the work. If there is any real or perceived conflict of interest, the researcher should normally not participate further in the review process, and should return the material unread.
- 13.3. All information made available to reviewers/referees must be treated in the strictest confidence, and they must not take advantage of any information obtained as a result of their role, e.g. either using ideas or material contained therein or presenting the information as their own. In particular they must not pirate unfunded grant applications or unpublished manuscripts (the latter including use of knowledge of a work before its publication, unless granted permission by the author(s), to further their own interests).

#### **14. Conflict of interest**

It is the responsibility of researchers to identify and declare any conflicts of interest, whether legal, ethical, moral, financial, personal or other nature, so that it does not become a complicating or actionable issue. The College's [Register of Interests Policy](#) must be adhered to.

#### **15. Publishing results**

- 15.1. Researchers should make every effort to ensure research findings are widely disseminated to both the academic community and where appropriate to the general public. This includes the sharing of negative results as appropriate.
- 15.2. The person with overall responsibility for the research programme should authorise publication of results: authorisation should cover both the content of the publication (integrity of results, adequacy of internal peer review, appropriate protection of intellectual property rights, appropriate authorship) and the intended place of publication.
- 15.3. When publishing, researchers should not misrepresent their work by omitting information that changes the meaning or significance of their findings.
- 15.4. Work should normally be published as a coherent entity rather than being artificially divided into a number of smaller parts. This does not necessarily preclude preliminary publication where appropriate, such as in letter format, or presentation at conferences, but caution should be exercised that redundant or duplicate publication does not result.

- 15.5. Redundant or duplicate publication, which is a publication that overlaps substantially with one already published elsewhere (in print or electronic media), is not good practice and should be avoided. There may be exceptions to this, such as a publication of a complete report that follows the publication of a preliminary report, or a paper presented at a meeting but not published in full or that is being considered for publication in proceedings or similar format. When submitting a manuscript, the author should always make a full statement to the editor about all submissions and previous reports that might be regarded as redundant or duplicate publication of the same or very similar work. The author should alert the editor if the work includes subjects about which a previous report has been published. Any such work should be referred to and referenced in the new paper. Copies of such material should be included with the submitted paper to help the editor decide how to handle the matter.
- 15.6. Researchers are, however, encouraged to communicate their results to as wide an audience as possible. In this context secondary publication may be justified and can be beneficial. For example, publication in another language or publication of a more accessible and widely disseminated report, might be appropriate. In this situation approval should be received from the editors of the publication outlets involved and the editor concerned with secondary publication informed.
- 15.7. More detailed guidance on the issues of redundant or secondary publication is usually available in the guidance to authors provided by academic journals or, for instance, in the ['Vancouver Guidelines'](#) (ICMJE *Recommendations for the Conduct, Reporting, Editing, and Publication of Scholarly Work in Medical Journals: Overlapping Publications*) or in the guidance on [Authorship and Contributorship](#) by the Committee of Publication Ethics (COPE).
- 15.8. In the context of communicating academic information it is always good practice to use as clear and accurate language as possible, without recourse to unnecessary jargon. This is essential when communicating information to a lay audience.
- 15.9. The College supports the freedom to publish research findings. There may, however, be occasions when a legitimate request for deferral of publication is made. An example of this would be when a collaborative partner may wish publication to be deferred until adequate protection of any intellectual property has been arranged. The College would expect the period of deferral requested to be no longer than necessary. There may, however, be occasions when an external funder of research exerts pressure in an attempt to suppress results, for example to conceal results they perceive to be detrimental to their interests. In this situation the College will take whatever action it deems necessary to counter any attempt at suppression.
- 15.10. When negotiating contracts with external funders the right to publish the results of the study should be protected. It is the responsibility of the

Research Office, on behalf of the College, and not that of the individual researcher to ensure this has been adequately done.

- 15.11. Many research funders (e.g. [UK Research and Innovation](#)) advocate open access to research publications. Depending on the funding stipulations this may or may not also include open access to research data. Researchers must be aware of and comply with any funding requirements with regards to open access and data management.
- 15.12. The College itself places importance on appropriate protection of IPR (see item 9), and researchers should refrain from any form of publication or disclosure until it is clear that any necessary protection has been secured.
- 15.13. Researchers must ensure that all publication and presentation of material arising from research is correct and accurate. If it subsequently becomes clear that this is not the case, the researcher must take appropriate steps to correct the information, and if necessary make a retraction, in all outlets the information has appeared in. Where appropriate, funding or external agencies should also be informed.

## **16. Authorship**

- 16.1. The issue of authorship is important in the context of good research practice. Although authorship practices may vary across disciplines the College supports an approach based on the ['Vancouver Guidelines'](#) (*ICMJE Recommendations for the Conduct, Reporting, Editing and Publication of Scholarly Work in Medical Journals*) with authorship credit based on all four of the following criteria being met:
  - substantial contributions to conception and design, or acquisition of data, or analysis or interpretation of data;
  - drafting the article or revising it critically for important intellectual content;
  - final approval of the version to be published;
  - agreement to be accountable for all aspects of the work in ensuring that questions related to the accuracy or integrity of any part of the work are appropriately investigated and resolved.
- 16.2. The above criteria are not intended to be used to deny authorship to those who deserve credit and individuals who meet the first criterion should have the opportunity to participate in the review, drafting and final approval of the article or manuscript.
- 16.3. It should be noted that the acquisition of funding, collection of data, or general supervision of the research group, alone, does not justify authorship. Each author should have participated sufficiently in the work to take public responsibility for appropriate portions of the content. Significant contributors, who do not meet the criteria for authorship, should be listed in an acknowledgements section. The practice of honorary authorship is unacceptable.

- 16.4. In order to minimise authorship disputes occurring it is good practice to discuss authorship, including order of authorship, at the start of projects rather than on submission of the research to a journal or conference.
- 16.5. Where an internal authorship dispute occurs, involving research that is not yet published or presented, researchers should attempt to resolve the dispute at a local level. Where it is not possible for the researchers to resolve the dispute, the matter should be referred to the Director of Research and Scholarship to review and mediate an agreed solution. Manuscripts for which there is an unresolved authorship dispute should not be submitted for publication before consulting with the Director of Research and Scholarship. Where there is a conflict of interest, an alternative senior member of College staff may be asked to consider the dispute.
- 16.6. Authorship disputes involving published manuscripts may be considered under the procedures detailed in the College's [Regulations Governing the Allegation and Investigation of Misconduct in Research](#). An individual or individuals with concerns regarding authorship of published works by a member of the College should raise the issue in writing to the Director of Research and Scholarship.
- 16.7. When an external authorship dispute involves collaborators or contributors from another institution, the procedures for dispute resolution at the lead author's institution should be followed.

## **17. Acknowledging the role of collaborators and other participants**

In all aspects of research, the contributions of formal collaborators and all others who directly assist or indirectly support the research must be properly acknowledged or a conflict of interest disclosed, including the source of funding where appropriate. This applies to any circumstances in which statements about the research are made, including provision of information about the nature and process of the research, and in publishing the outcome. Failure to acknowledge the contributions of others is regarded as unprofessional conduct. Conversely, collaborators and other contributors carry their share of the responsibility for the research and its outcome.

## **18. Health and safety**

Research should be conducted to the highest possible health and safety standards, both for the research participants, collaborators, and the general public. Research must adhere to current safety practices and legal requirements, and all researchers must be familiar with relevant College regulations, including the College's [Health and Safety at Work Policy](#)

## **19. Integrity in managing research projects**

- 19.1. Researchers must take all reasonable measures to ensure compliance with sponsor, institutional, legal, ethical and moral obligations in managing projects.

- 19.2. Researchers are expected to familiarise themselves with the terms and conditions of any research contract or agreement entered into by the College on their behalf.
- 19.3. Researchers must follow established College financial procedures in relation to procurement etc. See College [Procurement Policy](#).
- 19.4. The person with overall responsibility for a research project should ensure that it runs within its allocated budget, and ensure that no penalties are incurred by failure to meet sponsor's requirements, for example submission of reports according to schedule.
- 19.5. In accordance with the College's [Anti-Fraud and Bribery Policy](#) in no case should any offer of bribery or inducement be accepted.

## **20. Compliance with audit or other monitoring procedures**

Researchers must comply with any audit or monitoring procedures, whether external or internal, with which they legitimately may be asked to cooperate. Examples of such audit or monitoring may include examination of management of specific research projects, compliance with procedures, such as this Code of Ethics in Research or with external sponsor requirements.

## **21. Sources of research funding**

Researchers must consider any ethical implications associated with sources of funding, including potential conflicts of interest or reputational risks for the College. If unsure about the acceptability of a funding source, researchers should contact the Research Office.