

UNIVERSITY OF COPENHAGEN



# CODE OF CONDUCT FOR RESPONSIBLE RESEARCH



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# 1 Introduction

The University of Copenhagen (UCPH) is a key knowledge and culture-bearing institution. Through independent and curiosity-driven research, the university's researchers and students expand horizons with new knowledge and contribute to influencing societal trends. Safeguarding the principles that underpin the integrity of research is a key element in conducting research at the University of Copenhagen and applies to all scientific disciplines.

The University of Copenhagen's Code of Conduct for Responsible Research is based on the [Danish Code of Conduct for Research Integrity](#) and stipulates that the University of Copenhagen:

1. Maintains clear standards for the responsible conduct of research
2. Offers instruction and guidance in the responsible conduct of research
3. Has clear rules and procedures for the University's handling of suspicions of research misconduct and other breaches of responsible conduct of research.

The general division of responsibilities entails that the individual researcher is responsible for ensuring that published results are accurate, reliable and adhere to all relevant regulations. The university leadership is responsible for fostering and maintaining a culture of research integrity through teaching, training and supervision, and for taking appropriate measures when dealing with breaches of responsible conduct of research. When managers at the University have direct influence on researchers' conduct of a research project, they have a duty to support the researchers in complying with responsible conduct of research. In connection with research projects involving external commissioners or external partners, UCPH expects the external party to assume their share of the responsibility for ensuring the integrity of the research conducted, i.a. by duly maintaining the arm's length principle vis-à-vis the researchers directly involved in the project. Different sets of rules may apply to different types of partners.

All relevant legislation and reporting obligations must be complied with, and anyone who conducts research at the University of Copenhagen is responsible for familiarising themselves with current legislation and regulations within their field of research.

The University of Copenhagen has a number of policies and guidelines related to responsible research. They are available on the [Research Portal on KUnet](#).

## 2 Key principles for research integrity

The University of Copenhagen guards research integrity on the basis of six fundamental principles: freedom of research, transparency, accountability, honesty, impartiality and arm's length. These principles correspond to the principles set out in the Danish Code of Conduct for Research Integrity and in Universities Denmark's report Principles and Recommendations for Research-based Collaboration and Consultancy (the latter in Danish only).

### 2.1 FREEDOM OF RESEARCH

The universities' duty to safeguard freedom of research is laid down in the preamble to the Danish University Act. Freedom of research is a fundamental prerequisite for the universities' activities and the independence and legitimacy of researchers and research. Under the Act, the University enjoys freedom of research, and it has a duty to safeguard the freedom of research of the University and the individual researcher. The individual researcher has the right to freely define research problems, select and develop theories, gather empirical data, apply relevant methodology and present hypotheses, results and reasoning in public.

### 2.2 TRANSPARENCY

Transparency fosters trust in research. All phases of a research project must be subject to transparency in order to ensure the credibility of the scientific reasoning and the correlation between research and current practice in the relevant research field.

This requires that all research projects must be transparent and with open reporting on process, methodology, results, reasoning and conclusions. Transparency also applies to contributors, commissioners and sources of funding relating to the research in question, including the declaration of potential conflicts of interest.

### 2.3 ACCOUNTABILITY

All parties involved should be accountable for the research conducted. This means that researchers, institutions and any external partners have a shared responsibility to maintain the integrity of research in a given research project. All parties involved must contribute to ensuring the correctness and reliability of the research results, and that the research is conducted in accordance with all relevant rules and regulations. The specific division of roles and responsibilities is determined in connection with the planning of the research project.

## 2.4 HONESTY

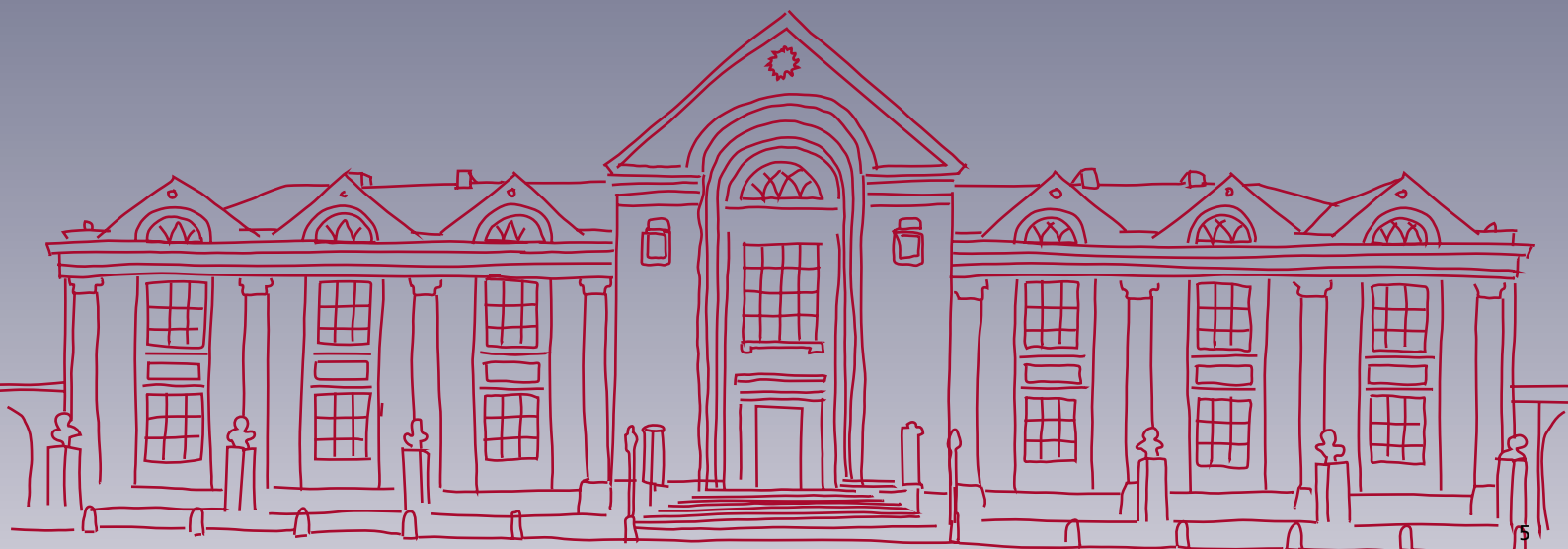
Honesty is a prerequisite for credible research. Honesty entails an objective and non-selective approach to existing knowledge, and an accurate, transparent and balanced account of known scientific positions and paradigms. Researchers must be honest when reporting on objectives, methods, data, analyses, results and conclusions. This applies equally when communicating one's own research and that of others' and when taking the role of peer reviewer.

## 2.5 IMPARTIALITY

Impartiality in research is a key principle for the activities of Danish universities. The University and the individual researchers must be independent of special interests that may influence the choice of methodology, presentation of results and conclusions. External conditions such as political priorities, external funding or partner requirements may have an impact on the choice of research areas in the individual projects, but the research process and the research results must be impartial at all times.

## 2.6 ARM'S LENGTH

Arm's length underpins the quality of and trust in research. The arm's length principle is based on mutual respect and understanding of the different roles, responsibilities and decision-making competences between the parties to a collaboration or in a hierarchy. Arm's length is when each party is given the full responsibility to perform their own tasks. The arm's length principle ensures that the researchers can make independent decisions and deliver impartial research without undue interference or consideration of financial, political or other special interests.



# 3 Responsible conduct of research

According to the Danish Code of Conduct for Research Integrity, responsible research encompasses six fundamental standards from the planning phase to the communication of results:

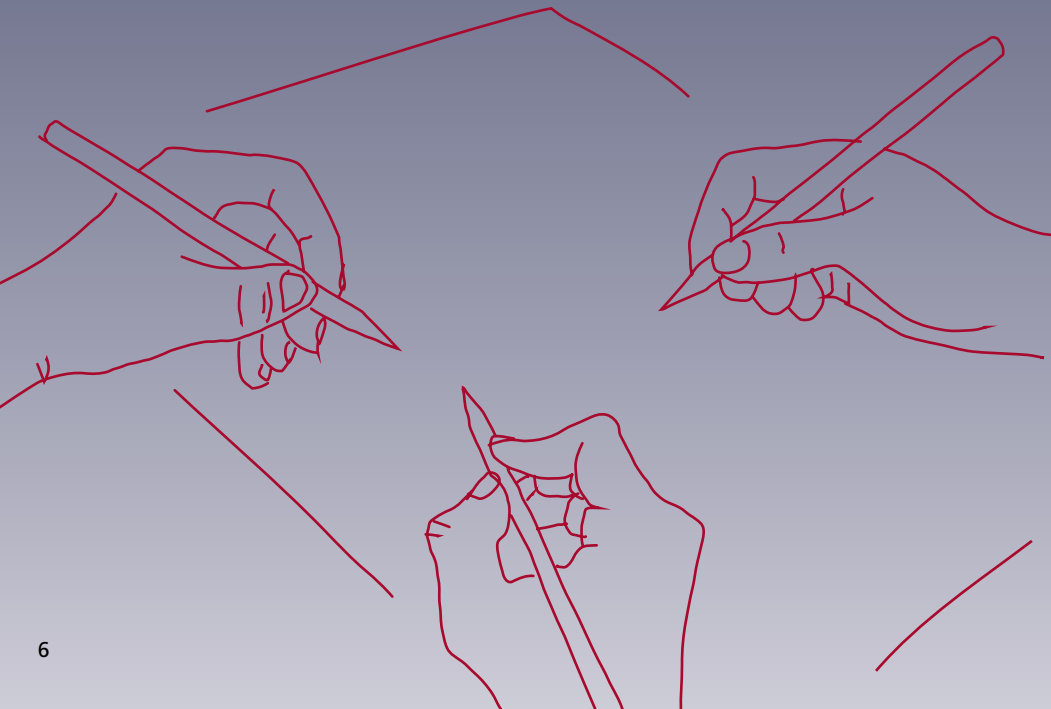
1. Research planning and conduct
2. Research data management
3. Publication and communication
4. Authorship
5. Collaborative research
6. Conflicts of interest

In the following sections, each of the six standards are explained as they are managed at the University of Copenhagen. It is the responsibility of the individual researcher and research group to follow these standards and to document them in accordance with the traditions of the discipline.

## 3.1 RESEARCH PLANNING AND CONDUCT

UCPH adheres to the description in the Danish Code of Conduct for Research Integrity of the responsibilities regarding research planning and conduct. At UCPH, this means that:

- Researchers are responsible for planning and conducting their research.
- Throughout the research, researchers should conduct assessments to determine if there are particular issues requiring permits, approvals, etc., e.g. approval from an ethics committee or an institutional review board
- Researchers cannot enter into agreements (e.g. with funders or others) that limit their access to their own data and their ability to analyse and publish these data independently, unless such access limitations can be justified by the specific circumstances.



The University maintains common policies for the proper management of research planning and conduct and for the procedures regarding the necessary approvals and permits.

To ensure the integrity of research carried out in collaboration with external parties, it is important that the research project is planned prior to its initiation in such a way that can be documented subsequently.

The level of formal measures to be taken in the planning and conducting of research may differ significantly according to the scale of the research project, a security assessment or different scientific traditions.

In some cases, it will be relevant to adapt the project plan during the project and, potentially, adjust project agreements and participant composition. Any changes to agreements should be in writing.

### **3.2 RESEARCH DATA MANAGEMENT**

Responsible conduct of research entails the correct handling of physical material and digital data. The main purpose of research data management is to increase efficiency and transparency in the research process and to contribute to the credibility of the research results and the possibility to reproduce them. The University of Copenhagen has adopted a [Policy for Research Data Management](#), which lays down requirements and

guidelines for the handling of research data and defines roles and responsibilities in relation to research data management.

According to this policy, researchers and students must thoroughly consider the handling of research data before physical material and digital data is collected, observed, generated, created or reused. Data management plans (DMP) must be prepared and documented, preferably in electronic form. Researchers and research groups should also ensure that research data is collected and handled in accordance with best practice within their field.

The University of Copenhagen adheres to the FAIR principles, which means that, as far as possible, data must be Findable, Accessible, Interoperable and Reproducible. As a general rule, research data must be publicly available after the end of the project, as a minimum the data sets underlying research publications. Considerations in relation to intellectual property rights, personal data protection, information security, commercial and national interests and legislation must be taken into account in accordance with the principle of 'as open as possible, as closed as necessary'. If there is a conflict between the requirement for public availability and the requirement for protection of personal data, and if this cannot be resolved through, for example, anonymity, the personal data protection requirement prevails.

The [Policy for Research Data Management \(2022\)](#) and more information about research data management can be found on the [Research Portal on KUNet](#).

#### **3.2.1 Protection of personal data**

All staff at the University of Copenhagen are obliged to comply with the [University's privacy policy](#). Research projects containing personal data must comply with current legal and ethical requirements for the processing of research data, including the [General Data Protection Regulation \(GDPR\)](#).

The University of Copenhagen has drawn up a set of [rules on the protection of personal data](#) to ensure that this information is not abused, and that individuals whose data are used in a project are informed of who will be processing their data, how and for what purpose.

Research projects containing personal data, research biobanks and biobanks must comply with the rules of the [General Data Protection Regulation](#). This means i.a. that research projects containing personal data, research biobanks and biobanks must be registered in the [University's records of biobanks](#) and of research projects containing personal data.

UCPH's joint records of the processing of personal data in research are presented to the [Danish Data Protection Agency](#) at their inspections. The record is a statu-

tory requirement that follows from the GDPR.

Research data is only for research purposes. Personal data in research projects may only be used for conducting the project. The data may not form part of administrative procedures. The result of the scientific or statistical processing of personal data may be used in an administrative context if it is not possible to identify individuals.

As stipulated in the General Data Protection Regulation, the University of Copenhagen has a [Data Protection Officer \(DPO\)](#), who is responsible for spreading knowledge and offering advice on the protection of personal data.

More information about the GDPR regulation and about the use of personal data in research is available on the [Research Portal](#) on KUnet.

### 3.3 PUBLICATION AND COMMUNICATION

The University Act stipulates that universities must communicate their research and share their knowledge with society. Publication and other forms of communication are an essential prerequisite for peer reviewing, evaluating and discussing research results. Such communication must be honest, transparent and accurate.

Researchers at the University of Copenhagen are expected to:

1. Publish their research in recognised and relevant scientific media such as journals, monographs and anthologies.
2. Ensure relevant quality control (peer review and/or critical discussion with colleagues).
3. Communicate their research to the public when relevant and support public debate and democratic decision-making.
4. Be open and explicit to the widest possible extent about the scientific grounds behind their public statements.
5. Comply with the [University's guidelines](#) for using their job title, academic degree and UCPH name when participating in public debate.

The University of Copenhagen supports researchers in these endeavours by promoting a culture of critical and open debate by offering guidance on research dissemination, communication and publication strategy, including Open Access. The University of Copenhagen endorses [Universities Denmark's seven principles for good research communication](#).

Employees can find more information on the [Research Portal](#).

### 3.4 AUTHORSHIP

The number of publications, impact factors and H-indexes are some of the key parameters used to assess the quality and/or impact of the research. As publications are a factor in the competition

for funding and positions, it is important that authorship reflects who has, in fact, conducted the research and deserves the recognition. Transparency with regard to authorship is also crucial because it makes it possible to place responsibility for research misconduct or questionable research practice.

Researchers at the University of Copenhagen are expected to follow the [Code of Authorship](#), which is based on the [Vancouver Rules](#) and states that "all persons that satisfy these criteria should be acknowledged as an author". All persons who have been appointed as authors must satisfy all of the following four criteria for authorship and all those who satisfy the four criteria should be acknowledged as authors:

- a) Substantial contributions to the conception or design of the work, or the acquisition, analysis or interpretation of data for the work; and
- b) Drafting the work or revising it critically for important intellectual content; and
- c) Final approval of the version to be published; and
- d) 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.



The criteria for authorship should not be used to exclude persons who would otherwise qualify as authors, and thus persons who meet the first criterion should be given the opportunity to also satisfy the other three criteria.

Researchers who do not meet all four criteria must be acknowledged in other ways. Therefore, it is considered good practice for co-authors, together with all other parties who have made contributions to one of the four items listed above, as early as possible and in a collaborative spirit, to enter into a collegial agreement on how to deal with co-authorship or other forms of acknowledgment.

Students who contribute to research should be acknowledged in a manner that reflects the extent of their contribution.

Read more about the Vancouver Rules [here](#).

### 3.5 COLLABORATIVE RESEARCH

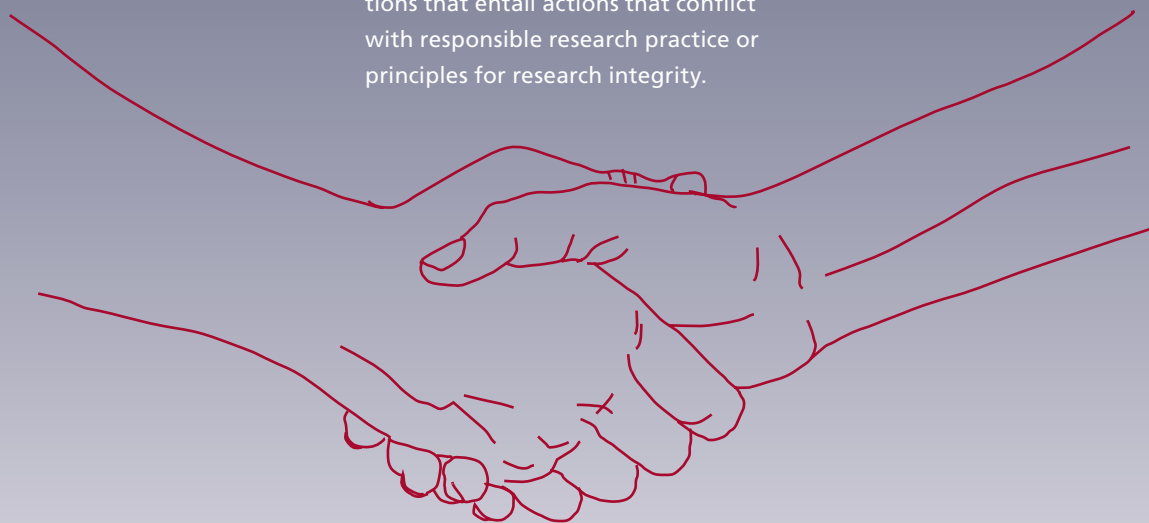
The University of Copenhagen conducts various forms of collaborative research with private and public organisations, including co-funded research, public sector services, commissioned research, research-based advisory services and other income-generating activities.

The University's ambition is to be an attractive partner for external partners. At the same time, it is the University's duty to safeguard freedom of research and the principles that ensure the integrity of research. Therefore, it is important to establish a strong contractual basis for collaboration with external parties.

Researchers employed at the University of Copenhagen cannot enter into legally binding agreements and collaborations with external parties on behalf of the University. An agreement is only valid when signed by an authorised signatory. Researchers may not commit to obligations that entail actions that conflict with responsible research practice or principles for research integrity.

The following principles will safeguard the integrity of research conducted in collaboration with external parties:

- a) An external party can contribute to determining research topic and questions, but scientific methodology should be chosen solely on the basis of scientifically based considerations, and the university researcher must be able to vouch for the scientific methodology.
- b) Researchers must be allowed the freedom to present their research as they desire.
- c) For quality control purposes, the University's researchers must have full access to data (including raw data and meta data) provided or held by an external party if the research is based on the data.
- d) Funding grants and other resources from an external party must be provided to a unit at the University and not directly to the individual researcher.



### 3.5.1 Legal matters in research collaboration

The Tech Transfer Office (TTO) of the University of Copenhagen negotiates all IP agreements, be they research collaboration agreements or commercial agreements (license agreements). The TTO ensures that the agreements adhere to laws and regulations for public research institutions and observe standards for responsible conduct of research. In all agreements, it is a prerequisite that the University's researchers are able to publish research results and use them for research purposes.

Agreements that do not contain IPR are handled by the faculties.

Elaboration of guidelines, etc., can be found on the Research Portal on KUNet and in Universities Denmark's Principles and Recommendations for Research-based Collaboration and Consultancy (in Danish only).

### 3.6 CONFLICTS OF INTEREST

The University of Copenhagen collaborates with private companies, public institutions, government agencies and organisations. The University aims to maintain and strengthen research collaboration with external parties in order to enhance the relevance of the research for the benefit of society. At the same time, it is the University's duty to safeguard freedom of research and the principles that ensure the integrity of research and independence from special interests.

According to the Danish Code of Conduct for Research Integrity, a conflict of interest is defined as a situation in which financial or other interests have the potential to compromise or unduly influence professional assessments.

Worst case, conflicts of interest can lead to research misconduct that is harmful to public trust in science. Conflicts of interest can also influence the direction and interpretation of research in more subtle ways.

Formal monitoring and disclosure play a key role in managing conflicts of interest; thus, all researchers at the University of Copenhagen must disclose possible conflicts of interest on their online researcher profile in CURIS.

It is also a key element in the handling of potential conflicts of interest to ensure clarity about the distribution of roles, responsibilities and decision-making among the partners in research collaboration.

It is a joint responsibility of the researchers, university management and any external partners to ensure that:

- Research results are not affected by special interests
- Researchers are free to publish and present their research results
- There is transparency about potential conflicts of interest

Elaboration of guidelines, etc., can be found in Guiding principles for handling conflicts of interest and in Universities Denmark's Principles and Recommendations for Research-based Collaboration and Consultancy (in Danish only). See also Security in international research collaboration on the Research Portal and UCPH rules for external activities in the Employee Guide on KUNet.



CONTRACT

# 4 Teaching and training responsible conduct of research

It is the University's responsibility to facilitate an open and critical academic discussion – which is crucial to maintaining and developing the principles of good responsible research and preventing research misconduct.

To promote the necessary knowledge and organisational readiness to handle breaches of the University of Copenhagen's Code of Conduct for Responsible Research, the University of Copenhagen continuously works to promote a culture of honesty, transparency and responsibility.

This is done through training and supervision, as well as by collaborating with institutions that provide advice and handling of claims of research misconduct or breaches of responsible conduct of research.

## 4.1 TEACHING AND SUPERVISION

All researchers at the University of Copenhagen (at the BA, MA/MSc, PhD, postdoc, assistant, associate and full professor levels as well as permanent and visiting staff) must familiarise themselves with the University of Copenhagen's Code of Conduct for Responsible Research. To promote and support this endeavour, the University has implemented the following initiatives:



- As part of their employment, all members of staff are obliged to familiarise themselves with and adhere to the University's Code of Conduct for Responsible Research.
- The principles behind responsible conduct of research are an academic learning objective for all BA and MA/MSc introduction programmes.
- All PhD students must complete a course on responsible conduct of research
- All principal PhD supervisors must complete a course on responsible conduct of research.

## 4.2 **ADVICE AND GUIDANCE ON RESPONSIBLE RESEARCH**

The University of Copenhagen has established institutions for advice on issues regarding responsible research on multiple levels. Each faculty has appointed at least one Named Person who offers advice on the principles of responsible research and in relation to research misconduct.

Furthermore, research ethics committees can be appointed at all faculties as needed. Finally, the University has set up a Practice Committee responsible for articulating standards for responsible conduct of research, considering claims of research misconduct and breaches of responsible research conduct, and which can refer cases to the Danish Board on Research Misconduct.

### 4.2.1 **Named Persons**

Each faculty at the University of Copenhagen has appointed Named Persons. Named Persons contribute to the faculty's compliance with the standards for responsible conduct of research.

A Named Person is tasked with:

- Advising on responsible conduct of research
- Advising on suspicions of breaches of responsible conduct of research

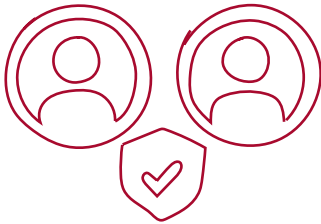
If deemed appropriate, the dean may enter into an agreement with the Named Person to take part in the faculty's work to inform, supervise and develop norms for responsible conduct of research, including contributing to the training of researchers, etc.

The faculties' Named Persons are independent entities. All staff and students can contact the Named Person at their faculty with questions of responsible conduct of research.

The Named Person has a duty to inform faculty management if there are reasonable grounds for suspecting research misconduct in a specific case or if there are reasonable grounds for suspecting that questionable research practices of a gross nature have been conducted.

Each case of suspicion of breach of the principles for responsible conduct of research or suspicion of research misconduct must be submitted to the Practice Committee. The Committee will decide whether the case should be referred to the Danish Committee on Research Misconduct, cf. sections 10 and 11 of the Act on Research Misconduct etc.

Employees can find more information and read the University's guidelines for Named Persons on the Research Portal.



#### 4.2.2 Research Ethics committees:

The University of Copenhagen wants to ensure that all research activities that require ethical considerations are carried out in a way that respects the rights, dignity and welfare of all involved humans and animals, and minimises the risk to all participants, researchers, third parties and the University itself.

Ethical assessments can be obtained for all research projects at the University in order to comply with international policies on research involving human participants as well as national rules and EU rules on personal data.

Research ethics committees can be appointed at all faculties as needed. The research ethics committees assess research practices with sensitivity to ethical considerations within their relevant fields.

Specifically, research ethics committees offer ethical assessments of research projects – and for some committees, also of publications – required by funders or scientific publishers, and which fall outside the remit of the regional science ethics committees or other national institutions.

Employees can find more information about research ethics committees on the [Research Portal](#).

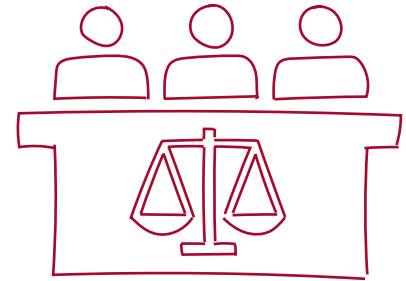
#### 4.2.3 The Practice Committee

The Practice Committee is set up by the Rector and is an internal committee composed of representatives appointed by the Academic Councils of the University's six faculties. The Committee deals with questions of responsible conduct of research in accordance with the Act on Research Misconduct etc.

The Practice Committee contributes to clarifying the existing norms for responsible conduct of research and considers specific cases of suspected breach of responsible conduct of research. If the Committee finds that a case is serious enough to be labelled as research misconduct, it refers the case to the Danish Board on Research Misconduct.

The Practice Committee considers cases submitted as written complaints: Cases submitted by employees seeking to have their name cleared in the wake of rumours of misconduct, cases submitted by the Rector and cases that the Committee itself deems to be of 'special significance'. The Practice Committee also hosts conferences on various topics related to responsible conduct of research.

Employees can find more information about the [Practice Committee](#) on the [Research Portal](#).



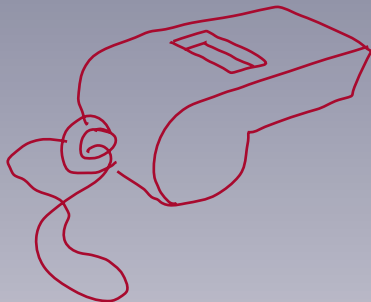
# 5 Research misconduct and other breaches of responsible conduct of research

The Act on Research Misconduct etc. defines research misconduct as fabrication, falsification and plagiarism committed wilfully or with gross negligence in the planning, performing or reporting of research.

- Fabrication: Undisclosed construction of data or substitution with fictitious data.
- Falsification: Manipulation of research material, equipment or processes as well as changing or omitting data or results making the research misleading.
- Plagiarism: Appropriation of other people's ideas, processes, results, texts or specific concepts without giving due credit

The Act on Research Misconduct etc. defines questionable research practice as:

“Violation of generally accepted standards for responsible research practices, including the standards in The Danish Code of Conduct for Research Integrity and other applicable institutional, national and international practices and guidelines for research integrity”



All current and former staff, both academic and administrative, as well as students – and the University leadership especially – are obliged to react to suspicions of breach of responsible conduct of research at the University of Copenhagen. External partners and persons not affiliated with the University of Copenhagen are also encouraged to draw attention to suspicions of breach of responsible conduct of research at the University.

The Named Person at the relevant faculty can advise on how to proceed with a suspicion of breach of responsible conduct of research or research misconduct. A suspicion can also be shared with University management or the Practice Committee, who will investigate and handle the case.

In cases of suspicion of breach of responsible conduct of research, the University of Copenhagen's Code of Conduct for Responsible Research should be applied. In accordance with the Danish Code of Conduct for Research Integrity, this means that:

- Those involved in dealing with the suspicion and the investigation should be impartial.
- The investigators should possess professional competences within the specific fields of research and thorough knowledge of responsible conduct of research. Preferably, one or more of the investigators should have experience with cases of research misconduct and/or breaches of responsible conduct of research.
- The parties to the case should be involved directly in the processing of the case by being given the opportunity to comment on the investigation material and by being kept informed of the case procedure.

- The parties to the case should be protected to the extent possible so that:
  - People who bring forward suspicions in good faith are protected from reprisals.
  - Complaints strictly brought forward in bad faith (as harassment) should in themselves be considered a breach of responsible conduct of research.
  - The identities of the parties are kept confidential to the extent possible.
- Similar cases/situations should be treated similarly.
- Investigation procedures should be made public.
- Cases should be completed in an efficient manner, so that no one is part of an investigation longer than strictly necessary.

More information is available on the Practice Committee website.

# 6 Links

Act on Research Misconduct etc.

Danish Code of Conduct for Research Integrity

Data Management Planner DMPonline

Research Portal

Practice Committee

Employee Guide rules on external activities

Tech Trans Office Pixi Guide 'Conflicts of Interest'

University of Copenhagen Code of Authorship

UCPH Policy on Research Data Management

Vancouver Rules

Guidelines for international research and innovation collaboration (UFM.dk)

Universities Denmark's Principles and Recommendations for Research-based Collaboration and Consultancy (in Danish)

Faculty-specific guidelines and other documents can be found on KUnet