

TO BE FORMATTED

Ethics, Misconduct and Integrity in Research, Innovation and Teaching Policy

17th June 2025 – APPROVED BY ACADEMIC COUNCIL

1. Introduction

This Policy provides a framework for professional practice and decision-making on ethical issues as they arise in the work of the University within research, innovation, learning and teaching. It also relates to how the University handles research misconduct.

This is to ensure that the University meets its aim and legal responsibility to promote ethical practice, and protect the rights, welfare, safety and dignity of all staff, students and others involved in Teaching & Learning, and Research & Innovation.

2. Scope and Definitions

This policy relates specifically to the academic activities of i) research and innovation and ii) learning and teaching. It specifically covers research misconduct but not misconduct covered by other University policies.

This policy does not apply to ethical issues relating to the wider strategic interests of the University including business partnerships and matters of procurement or investment. This business is the responsibility of the University Executive Board and/or governors, is normally negotiated at institutional level, and can be contrasted with innovation projects that are typically managed at faculty or department/school levels.

The University has a separate Working with Animals Policy that defines the terms of reference for our Animal Welfare and Ethical Review Body (AWERB), although the AWERB is supported by the University Ethics Committee (see section 6).

This Policy should be read in conjunction with other University Policies, including but not limited to, the Whistleblowing Policy, The Disciplinary Policy, The Equality, Diversity and Inclusion (EDI) Governance Structure, and other relevant policies.

For research the University has adopted the [UKRIO Code of Practice for Research](#) and its definitions. The code of practice requires staff and students to adhere to the key principles of integrity contained therein. Any member of the University who believes that there may have been a breach of research integrity under this policy should then refer to the [Research Misconduct Procedure](#), and seek advice from the Director of Corporate Governance. The University will invoke its staff or student disciplinary procedures in relation to breaches of research ethics, integrity and governance.

This Policy applies equally to research and innovation work carried out through any University subsidiary company, any teaching delivered by partner organisations, and any teaching accredited by the University.

Specific advice and guidance for adhering to this policy can be found on the ethics page of the University website.

3. Values

Ethical judgments result from a process of values-informed debate, in which sometimes complex principles and considerations contribute to the outcome. Some of these values stem from the University, while others originate outside the University. For example, values relating to subject disciplines originate from professional ethics codes as promulgated by professional or subject specific associations or accrediting bodies. The University recognises a distinction between ethical and legal requirements. In most cases strict adherence to the law, or to regulatory requirements, is the primary ethical commitment that must be considered prior to other ethical issues.

Values are the shared, fundamental beliefs held by the University as a community of learning. [The University's Strategy and Vision](#) describes the University as ambitious, responsible and open.

[The University's Strategy and Vision](#) includes a commitment to "act with integrity for the greater good" and to "insist on upholding the highest academic and professional standards". As matter of social responsibility, the University reserves the right to refuse funding from organisations that do not share its values, and requires members of its community to exercise due diligence when entering into agreements with such organisations.

Our commitment to acting with integrity for the greater good and upholding the highest academic and professional standards requires that all members of the University treat one another appropriately and fairly, and that communications of all kinds are not offensive. Issues relating to harassment and bullying are covered in the [Dignity and Respect Policy](#) and policies on communication are embodied in [Staff's](#) and [Students' Email Policies](#).

Innovation, creativity and freedom of academic enquiry and expression are enshrined both by law and the need to ensure openness and respect in relations within our community. Provided that these requirements are met, the University will support staff and students seeking to publicise the results of research and scholarship that has been carried out as a part of their roles within the University. The University expects staff and students to share its values and requires that they do not associate the University, or other members of it, in matters which reflect their own opinions on topics that are not the outcome of work carried out as part of their roles in the University (see the [External Speaker Policy](#)).

Some of the implications of these values are the subject of other policies. These include those in the area of Equality and Diversity, such as [The Equality and Diversity Policy Statement](#) that details the University's commitment to the strategic plan and includes values of being 'serious about inclusivity' and being 'committed to improving social mobility'. The University also has a [Declaration of Interests Policy](#) that provides a framework to help ensure that staff and governors do not place themselves in a position where their professionalism, integrity, impartiality and honesty might be questioned or where the activities of the University are brought into disrepute.

The UK Committee on Research Integrity (UKCORI) publishes a Concordat to Support Research Integrity that sets out a national framework for good research conduct and its governance. The University supports the principles of the Concordat, and of other UK agencies that seek to promote the highest standards of research conduct such as those embodied in the UKRI Policy and Guidelines on the Governance of Good Research Conduct.

The Board of Governors is responsible for ensuring that the University retains the highest levels of academic and professional integrity and that we deliver our obligations in relation to corporate social responsibility.

4. Ethics, Integrity and Governance

4.1 Research & Innovation

Within research and innovation, Ethics, Integrity and Governance represents three perspectives that together ensure high quality and successful work. Ethics refers to engagement with, and the work of, Ethics Committees. These play a key role in identifying and coming to an opinion on issues that may arise within projects or protocols. Ethics review considers how the widely accepted ethical principles of Autonomy, Beneficence, Non-maleficence and Justice are applied within the proposed work. The University's arrangements for Ethics Review are described in sections 5 and 6.

Integrity refers to the virtues that staff and academics apply as they conduct their work. Common virtues relating to research and innovation include rigour, accuracy, originality, honesty, transparency, collaborative working, openness and creativity. These virtues form the basis for informing specific behaviours such as how data is gathered, handled and analysed, how collaborations are managed, how results are reported, and how expert opinion is provided. In recognition of the wide range of academic fields, methodologies and approaches, the University encourages academic communities to consider how the virtues apply to their work, and how to promote integrity among their stakeholders. Staff are encouraged to engage with their wider academic communities to develop and promote research integrity in their areas of study.

Governance refers to the duties that the University and its staff fulfil when conducting research and innovation activities. Duties are often defined by wider laws (such as arrangements relating to clinical trials, research involving human tissue etc.) and policies such as those published by research and higher education funders or professional and learned societies. Governance duties are often defined in the wider range of University policies and therefore form part of each staff member's contractual relationship with the University. Where research and innovation activities are being conducted (including when research or innovation activities are conducted for educational purposes) responsibility for ensuring governance duties are met lies initially with the member of staff responsible for the project/student, followed by their department/school head, followed by Dean of Faculty, and ultimately PVC research, innovation and external engagement.

4.2 Learning and Teaching

The University embraces the following general principles governing its learning and teaching activities, aiming to maximise students' potential, and encourage democratic participation in civil society:

- a) Teaching methods and styles must be adapted to be inclusive, taking full account of the diversity of students
- b) Learning and assessment requiring public engagement must undergo an ethics review
- c) Students must be encouraged to develop informed opinions
- d) When teaching involves the use of material that might be reasonably expected to cause offence or distress, students must be informed in advance and given the opportunity to opt out
- e) Ethics-related matters are regularly considered in the course review process

5. Ethics Review

All research and innovation activities undertaken by staff and students of the University (and by others in collaboration with us) requires an ethics review prior to starting. Ethics reviews should be proportionate by taking into account work having no material ethical concerns, and work intended to provide a learning experience rather than advancing knowledge.

Ethics reviews are complex but at the minimum should:

- Assess whether activities aim to maximise benefit for individuals and society whilst minimising risk and harm to participants, and that staff/students are acting with due regard to their social responsibilities in conducting and disseminating their research.
- Assess whether activities respect the privacy, autonomy, diversity, values, and dignity of individuals, groups and communities. Reviews should ensure work is not discriminatory and considers the needs, experiences and beliefs of different groups within society where appropriate.
- Wherever possible ensure that participation is voluntary and appropriately informed; consent is provided by the participant or, in the case of a minor, a person with parental responsibility. In the case of adults lacking capacity, researchers must act in accordance with the Mental Capacity Act 2005.
- Ensure activities are conducted with integrity and transparency, employing the most appropriate methods for the purpose with lines of responsibility and accountability clearly defined.
- Ensure independence of research, innovation and teaching, and where conflicts of interest cannot be avoided, they should be made explicit and include detail on how this will be managed.
- Ensure that confidentiality when it is assured, is respected, and due regard is paid to the security and ethical use of personal and sensitive information, adhering to the requirements of the Data Protection Act 2018 and UK GDPR.
- Ensure that all Research, Innovation and Teaching, including work that does not involve human participants, takes account of the following general principles:
 - a. Acting with due respect for the environment, taking account of sustainability and its continuing integrity
 - b. Ensuring sensitive data is managed with care and due regard to legal constraints
 - c. Ensuring Technological innovation aims to improve the quality of life for mankind
 - d. Abiding by legal, institutional and accepted practices, procedures and protocols in the treatment of animals

5.1 Research

Any research involving NHS patients and/or their relatives or carers requires the submission of the project to the appropriate NHS Research Ethics Committee (REC) prior to the recruitment of any participant. There are other circumstances where ethics review by a NHS REC is legally required such as in relation to the human tissue act or mental capacity act. Further details can be found on the Health Research Authorities webpages. Some other studies might need to be reviewed by other external bodies including the Ministry of Defence REC (for research relating to military personnel), Her Majesty's Prison and Probation Service (for research involving prisoners), and the National Social Care Ethics Committee. Some charities or funders may also have their own ethics committees. Faculty ethics committees should be notified of successful applications to external committees and receive copies of the application documents and favourable opinion letter but need not formally review these studies. As a matter of good practice, Faculty ethics committees should offer advice and support to researchers seeking external reviews.

All research and innovation activity not subject, as a matter of law or policy, to external ethics review must be subject to internal review prior to the recruitment of any participant. It should be noted that review must be proportionate to the risks and burdens associated with the research. Normally, formal review by a faculty committee is only necessary for staff research and innovation, and work undertaken by research students, involving human participation. Ethics review of undergraduate and taught postgraduate research can be undertaken by a school ethics committee following procedures and guidance promulgated by the relevant faculty ethics committee. Where a team conducts research, the leader of the team or principal investigator is responsible for ensuring that the project is subject to independent ethics review. All other research activities must be reviewed using the online review system.

For the purposes of research governance and ethics, the supervisors of undergraduate and taught postgraduate students take the responsibility of principal investigator.

5.2 Innovation

Many innovation projects do not include significant ethical issues as they centre on work such as product development and evaluation. Projects of this nature need not be reviewed by the faculty ethics committees. Staff undertaking such projects must instead use the online review system.

However, where innovation projects raise significant ethics issues (as flagged by the online review system) they must be submitted for review to the relevant faculty ethics committee.

5.3 Learning and teaching

Ethics should be a part of the curriculum and explicitly included in teaching and course materials. Every student in a programme should have opportunities for reflection and debate on relevant ethical issues. AdvancedHE has published further guidance regarding partnerships with students in learning and teaching regarding ethics.

Ethical choices and issues may also arise in relation to the learning, teaching and assessment methods adopted, including students' experiences on placements and in work-based learning contexts. Members of staff need to be alert to any potential for pedagogic practice to treat students, or ask students to treat others, in ways that are unethical.

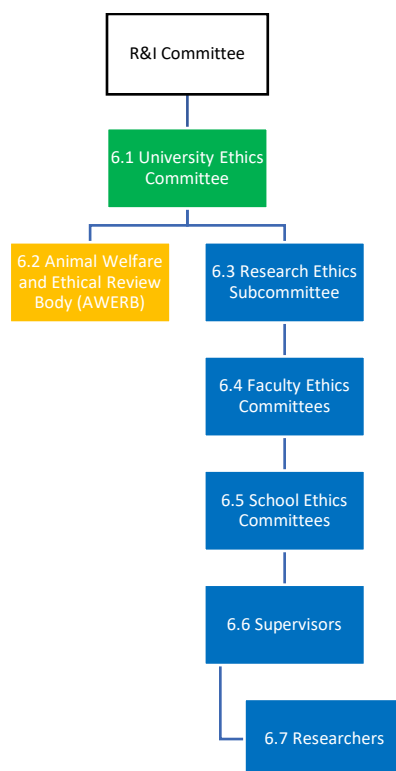
Ethical issues that may be relevant in teaching include:

- a) The design, conduct, dissemination and interpretation of research
- b) The impact of subject matter on individuals or identifiable groups including but not necessarily limited to those groups directly specified in legislation
- c) The understanding and analysis of the context and mechanisms of choice between alternative policies or practices
- d) The impact of applications of the subject matter on the environment
- e) The impact of the subject matter on creativity, freedom and autonomy
- f) The understanding of historical and cross-cultural differences in ethical consideration and standards

This list cannot be exhaustive. Teaching should encourage open debate on how ethical issues might be identified and resolved.

All undergraduate and postgraduate students involved in research projects are required to consider the ethical dimensions of their work and to follow the sections of this Policy relating to research governance, ethics and integrity. General advice can be obtained from their supervisor, school ethics representative, Chairs of the relevant faculty ethics committees, or from the University Ethics Advisor.

6. Roles and Responsibilities for Ethics Review



6.1 University Ethics Committee

The University Ethics Committee takes a broad overview of the ethical issues relating to the academic activities of the University. The University Ethics Committee reports to the University Research and Innovation Committee (R&I Committee) and Academic Council. It is chaired by the Deputy Vice-Chancellor (Research, Innovation and External Relations). There is representation on the Committee from the Board of Governors in recognition of the ethical responsibilities of the Board. Membership and terms of reference are available on the University's ethics webpage. The University Ethics Committee is responsible for ensuring that values and principles referred to above are applied in all parts of the University. It is not the responsibility of the committee to investigate allegations of research misconduct, although final reports may be shared with the committee on conclusion of the investigation, if pertinent learnings can be made and best practice shared.

6.2 Animal Welfare and Ethical Review Body (AWERB)

All work involving animals (as defined by the Animals (Scientific Procedures) Act 1986) by University staff is reviewed by the Animal welfare and ethical review body (AWERB), irrespective of a requirement by the Home Office for a licence. The AWERB includes a vet, key animal technicians, experienced project licence holders and members of the University's senior management team, together with lay members, some of whom are independent of the University.

In addition to ensuring that all work involving animals is scientifically and ethically justified, for licensed projects, the AWERB considers annually the scientific progress made in each project, together with how the use of animals in that project has been replaced, reduced and refined (the 3Rs). It disseminates best practice and acts as a forum to update animal users on advances that address the 3Rs, thereby keeping the use of animals in research to a minimum.

The University and its researchers are subject to inspection by the Home Office, which examines all aspects of animal research, care and welfare. Under Home Office categorisation our experimental procedures on animals are generally classified as "mild".

6.3 Research Ethics Subcommittee

Recognising that ethics review of research and innovation requires specific procedures and expertise, the University Ethics Committee delegates responsibility for these aspects to this subcommittee. The subcommittee directly supervises the faculty Ethics Committees and takes responsibility for proposing and managing operational aspects of research and innovation ethics review. It also reviews appeals of opinions provided by faculty ethics committee. The research ethics subcommittee is chaired by the University Ethics Advisor and is composed of the chair (or nominated representative) from each faculty ethics committee along with other co-opted members where necessary, and a representative from Research Services. Terms of reference are available online.

6.4 Faculty Ethics Committees

There are ethics committees in all faculties whose primary role is to provide a review of research and innovation projects in their faculty.

Any research or innovation activity carried out by staff in central departments should be referred to the University Ethics Advisor who will recommend a suitable pathway for review.

Faculty ethics committees have the same terms of reference and constitution, available online. Every academic school is represented in the relevant faculty ethics committee. Faculty committees must have a terms of reference, meet at regular intervals, and have a mechanism for review of urgent or short-notice cases. They consider the principles outlined in this document and primarily review research and innovation project protocols. The University Research Ethics subcommittee and University Ethics Adviser ensure that faculty committees operate equitably and follow similar procedures.

Clear guidance regarding necessary documentation and the process of ethics review can be found on the University's website. Application forms for ethics review by a faculty ethics committee can be found on the website. There are also links to templates and guidance documents.

If an applicant is sure that their research poses no ethics issues, for example it does not

- a) Involve animals
- b) involve human participants
- c) impact on the integrity of the environment
- d) impact on our cultural heritage
- e) include any sensitive issues

the online reviewing system should be used.

The favourable opinion of a faculty ethics committee provides assurance that if the research is conducted in line with the documents reviewed by the Committee, it will be deemed as ethically acceptable. The Committee is not empowered to give permission to conduct research. Governance permissions (as described in section 4.1) will need to be obtained within the normal line management structures. If there are any substantial changes to the research protocol or documents submitted for ethics review these must be reported to the committee and further review sought.

Researchers may appeal the decision of a faculty ethics committee to the Research Ethics Subcommittee who will implement a formal appeal process. The decision of the Research Ethics Subcommittee is final.

6.5 School Ethics Committees

All academic schools must have a member of staff on the relevant faculty ethics committee who can also act as an initial point of contact regarding ethical issues arising within their school or department. School representatives must liaise with their faculty ethics committee and the University Ethics Advisor where appropriate. Some schools may need to expand this role into a school ethics committee. These committees are sub-committees of the relevant faculty ethics committee and may review studies at undergraduate and taught postgraduate level only. Terms of reference must be approved by faculty ethics committees.

Many subject areas within the University will have available requirements, guidelines or a code of practice on ethical issues that have been developed by regulatory authorities, professional bodies, learned societies or subject associations. Where such external documents are available, the school may make an explicit resolution to adopt the guidelines or code for the discipline or profession, either in whole or in part, and should communicate this decision for ratification, together with a copy of the relevant documents, to the University Ethics Committee. Members of staff are encouraged to consult published guidance produced by regulatory authorities such as the Human Tissue Authority. However, the University would not expect individual members of staff to make direct contact with these authorities. If specific advice is required, it should be sought in consultation with the University Ethics Advisor.

6.6 Supervisors

Supervisors of undergraduate and taught postgraduate students are responsible for providing appropriate ethics guidance and take all reasonable precautions to ensure that student research is conducted ethically. Supervisors must take the role of principal investigator and therefore closely support the student who should be regarded as a co-investigator. Supervisors should not normally provide an independent ethics review of their students' work unless agreed in advance by the University Ethics Committee.

Supervisors of postgraduate research students should provide guidance and assistance to ensure ethical design, conduct and dissemination of their student's research. Supervisors are required to 'sign off' their students' applications to ethics committees but cannot provide an independent ethics review. Postgraduate research students should be regarded as principal investigators.

6.7 Researchers

All staff and students involved in research are accountable to society, to the University, and where relevant, to their profession, funders of the research and any research volunteers. This includes cooperation and compliance with governance procedures, seeking ethics review as required, and the subsequent adoption of ethically approved research methods that are appropriate to their discipline.

7. Research Misconduct

Ensuring and sustaining the reliability and trustworthiness of research is a core aspect of the University's commitment to the advancement of knowledge. Misconduct in research damages this, bringing both the individual and the institution into disrepute and can cause harm to those involved in research. Vexatious claims of research misconduct can also be damaging to individuals and institutions. Allegations of research misconduct are therefore an extremely serious matter, and the University has a duty to ensure that if they are reported, a fair and transparent process is in place to investigate. The University seeks to sustain this approach by providing an environment that fosters and supports honesty in research and also discourages unacceptable behaviour by dealing seriously and sensitively with all allegations of misconduct in research.

It is a condition of conducting research under the auspices of the University and/or on University premises that practice conforms to the UK Research Integrity Office Code of Practice for Research. Failure by a researcher to comply with the provisions of that Code will be grounds for action under the Research Misconduct Procedure. Where allegations of research misconduct apply to activities conducted prior to, or external to, an individual's current University position (either as staff or student), and the misconduct allegation has not been resolved by an external entity, the Research Misconduct Procedure will be used to determine whether the University needs to take any further actions.

Staff, research students and all others conducting research under the auspices of the University (e.g. University owned spinouts, industrial partners using University facilities etc.) are required to report misconduct in research where they have good reason to believe it is occurring. The University will investigate allegations or complaints about misconduct in research. Those making an allegation or complaint will not be penalised, if it is done without malice and in good faith, reasonably believing it to be true.

When an allegation of research misconduct is raised under the University's Whistleblowing Policy or through internal processes, the allegation will be considered by the Director of Corporate Governance (or delegated individuals) and subsequently investigated using the process described in the Research Misconduct Procedure. This procedure is modelled on a template provided by the UK Research Integrity office, whose definition of research misconduct is: "behaviours that deliberately or recklessly fall short of the standards expected in the conduct of research". Examples include:

- Using other people's ideas, intellectual property, or work without their permission and/or acknowledging their input (plagiarism);
- Breaching legal, ethical and professional requirements needed for research, for example those needed for human research participants, animals, or human organs or tissue used in research, or for the protection of the environment. An example of this includes proceeding with research without ethics review or not obtaining informed consent.
- Proceeding with research without necessary permissions and approvals in place.
- Making up data or results, or other aspect of the research such as patient consent (fabrication);
- Manipulating and/or selecting research processes, materials, equipment, data etc. to present a false impression or outcome (falsification);
- Misrepresenting data or other information.
- Failing to declare or appropriately manage conflicts of interest.

If misconduct is found the outcome of the process will be to ensure the academic record is corrected, and any individuals involved receive sanction and/or appropriate support and training as detailed in the Research Misconduct Procedure..

8. Training

Training for staff, postgraduate research students, taught postgraduates and undergraduates will include discussions of research ethics, governance and integrity issues, and the relevant codes of practice of the University and external bodies. Members of research ethics committees will receive additional training appropriate to their roles.

Training will be provided to undergraduates and taught postgraduates through their course teams, postgraduate researchers through the Graduate School Development Programme, and staff and contracted researchers through staff training. Training will focus on best practice as promulgated through research funders, learned societies and other charities/organisations that promote best practice in areas of University business (such as Universities UK, and the UK Research Integrity Office). The ethics advisor (see section 9) will ensure that training aligns with such best practice.

9. Management and communication

The implementation of this Policy requires that:

Managers in all areas of the University are responsible for considering how to address the governance, ethics and integrity dimensions of research, innovation, learning, teaching and business partnership activities.

Heads of Schools, Department and Deans are responsible for ensuring that necessary ethics committees are in place, that they report to the University Ethics Committee, and that staff and students are informed of ethical issues in their subject areas. They will also ensure that the Business Partnerships sub-committee is made aware of all new, and any renewed, proposals.

All members of the University community (governors, staff and students) have the right to raise ethics issues, seeking advice if necessary, from their school ethics representative, Chair of the relevant faculty ethics committee, University Ethics Adviser or the Director of Corporate Governance.

Any member of the University community who has concerns about any aspect of conduct and practice should seek the advice of the Director of Corporate Governance. Members of the community are reminded that the University has a [Whistle Blowing Policy](#) that protects members of staff who wish to report some danger, fraud, or other illegal or unethical conduct in the workplace from any detriment.

All researchers and research groups must include consideration of ethics, integrity and governance matters in their work.

Heads of Department and Deans are responsible for ensuring that local codes, guidelines and procedures are communicated effectively and are supported by appropriate administrative arrangements and documentation.

The University will employ an Ethics Adviser whose job is to manage and scrutinise the University's processes to:

- a) Establish best practice in ethical standards relating to research & innovation and learning & teaching, across the University.
- b) Meet the requirements of the UUK Concordat, UKRI and other external funding bodies regarding ethics, governance and integrity matters
- c) Advise the University Executive Board where appropriate on ethical issues
- d) Chair the research ethics subcommittee and/or business partnerships ethics subcommittee.
- e) Develop, implement and oversee new policies, procedures and practices relating to research ethics, integrity and governance
- f) Provide strategic guidance, general advice and support concerning ethics to those undertaking research and innovation activities
- g) Coordinate training of staff and students in relation to this policy
- h) Ensure the University ethics procedures are consistent with external national and international standards and procedures where relevant.
- i) Where delegated, and if there is no conflict of interest (as agreed by the Director of Corporate Governance), coordinate or support any activities relating to the Research Misconduct Procedure.

10. References

UK Research Integrity Office (UKRIO) Code of Practice for Research (October 2009), adopted by the University of Portsmouth:
<http://www.ukrio.org/publications/code-of-practice-for-research/>

UKRIO Recommended Checklist for Researchers:
<http://www.ukrio.org/wp-content/uploads/UKRIO-Recommended-Checklist-for-Researchers.pdf>

Equality and Diversity Policy Statement, University of Portsmouth:
<http://policies.docstore.port.ac.uk/policy-027.pdf>

Dignity and Respect Policy 2016:
<http://policies.docstore.port.ac.uk/policy-007.pdf>

External Speaker Policy:
<http://policies.docstore.port.ac.uk/policy-181.pdf>

Governance Arrangements for Research Ethics Committees. Department of Health 2018
<https://www.hra.nhs.uk/planning-and-improving-research/policies-standards-legislation/governance-arrangement-research-ethics-committees/>

Procedure for the investigation of Allegations of Misconduct in Research, University of Portsmouth:
<http://policies.docstore.port.ac.uk/policy-023.pdf>

Declaration of Interests Policy, University of Portsmouth:
<http://policies.docstore.port.ac.uk/policy-104.pdf>

UKRI Policy and Guidelines on research integrity:
<https://www.ukri.org/about-us/policies-and-standards/research-integrity/>

Staff Email Policy:
<http://policies.docstore.port.ac.uk/policy-070.pdf>

Universities UK Concordat to support research integrity (2019):
<https://www.universitiesuk.ac.uk/news/Pages/Updated-concordat-must-be-followed-if-research-is-to-be-trusted.aspx>

Whistleblowing Policy, University of Portsmouth:
<http://policies.docstore.port.ac.uk/policy-067.pdf>

Working with Animals Policy, University of Portsmouth:
<http://policies.docstore.port.ac.uk/policy-080.pdf>

Research and Innovation Strategy:
<http://www.port.ac.uk/realising-the-vision/strategy/>

Research and Innovation Services – ethics and governance website:
<http://www.port.ac.uk/research/ethics>
<http://www.port.ac.uk/research/our-research/research-governance/>

NHS Ethics Review:
<https://www.hra.nhs.uk/approvals-amendments/>