

## **FMS/UHWI GUIDELINES FOR THE CONDUCT OF RESEARCH**

### **INTRODUCTION**

Medical research seeks to provide general or specific benefits for society by utilizing medical information obtained through experimentation and investigation. Research may also serve specific intellectual purposes. However, research should be used to increase knowledge in ways that do not harm society.

Academics, scientists, researchers, and students have the responsibility to adhere to the highest ethical and scientific standards in formulating, conducting, and presenting research.

Researchers / investigators are normally expected to assume direct responsibility for the intellectual quality of their work, and must always balance the possibility of harmful application against potential benefits.

Researchers / investigators have the responsibility to ensure that the welfare of human subjects participating in research is safeguarded. The conscience of each investigator in applying ethical principles is the single most important protection for the welfare of human subjects. Such principles include the rights of privacy, confidentiality of research, information, the right of subjects to information about experimental procedures, respect for subjects' psychological well-being, and respect for social stability.

All research should meet the highest ethical and scientific standards, and proposals for research should be reviewed by informed peers who are not directly involved in the research.

### **RESEARCH POLICY GUIDELINES**

Policy guidelines on the conduct of research aim to:

1. Strengthen the integrity of the research process
2. Promote responsible research conduct
3. Clarify appropriate methods to address instances of misconduct in science

**PROCEDURES FOR GOOD ETHICAL PRACTICE IN RESEARCH WITH HUMAN SUBJECTS**

- 1) The protocol should explicitly state all potential benefits (or whether no direct benefit will accrue) and all possible risks or disadvantages for the subjects in the study
- 2) The protocol should provide the exact description of the information to be delivered to the subjects of the study, and indicate when it will be communicated orally and in writing. Examples of this information include: The objectives and purposes of the study, any experimental procedures, any known short- or long-term risks, possible discomforts, expected benefits of the procedures used, duration of the studies, alternative methods for treatment if the study is a clinical trial, suspension of the study if there is a finding of significant negative effects or if there is sufficient evidence of such positive effects that continuing with the study cannot be justified, and the freedom of subjects to withdraw from the study whenever they want.
- 3) When appropriate, indicate any special incentive or treatment that subjects will receive through their participation in the study. If there is any type of remuneration, specify the amount, method of delivery, time, and reason why payment is required.
- 4) Indicate how the information obtained from participants in the study will be kept confidential.
- 5) List any drugs, vaccines, devices, procedures or instruments to be used, and state whether they are registered, unregistered, new or currently being used in this country.
- 6) A brief synopsis of how the research findings will be reported and delivered to the subjects involved in the study or to other interested parties, should be done.
- 7) Indicate and justify the inclusion, as appropriate, of children, the elderly, the physically challenged, or of pregnant women. Justify the non-inclusion in the study group, if appropriate, of women (of any age), an ethnic minority, a racial group, or any other social category .
- 8) When appropriate, indicate how the appropriate balance of the two sexes will be ensured in the study groups. In addition, indicate, when appropriate, how gender inequities and discrimination and disadvantages can affect women's involvement in the research.

## **THE ASSESSMENT OF RISKS AND BENEFITS**

Research must be justified on the basis of a favourable *risk / benefit* ratio. Every biomedical research project involving human subjects should be preceded by careful assessment of predictable risks in comparison with foreseeable benefits to the subjects or to others. Concern for the interests of the subjects must always prevail over the interests of science and society. In order to justify exposing subjects to any risks of experimentation, therefore, research must be well-designed and addressing an important question.

The assessment of the potential benefits of research includes estimations of

- The ***magnitude*** - How is the knowledge gained likely *to* be used? In the research of a particular treatment, how severe is the problem which this research aims to alleviate? How common is the problem?
- The ***probability*** - How likely is the research to achieve its aims?
- The ***beneficiaries*** of the research - Is the research intended to benefit the participant, or other people?
- Resource*** - Will the potential benefits be limited because they are very expensive, or require unusually highly trained professionals?

The assessment of potential harm include estimations of:

- The ***types of intervention*** - How invasive or intrusive is the research? (Psycho-social research should be assessed as carefully as physical research)
- The ***magnitude*** - How severe may be the harms associated with the research procedures?
- The ***probability*** - How likely are the harms to occur?
- The ***timing*** - Might adverse effects be brief or long-lasting, immediate or not evident until years later?

***Equity***

- Are a few subjects drawn into too many projects simply because they are available? Are researchers relying unduly on subjects who already have many problems?

**Interim finding of harm:**

If evidence of harm, whether in giving or withholding certain treatment, emerges during the trial, how will any possible conflict between the interests of the subjects and those of the valid research be managed?

For patients enrolled in research, an independent, disinterested professional should be responsible for the patient's welfare, and should have the authority to stop any procedure s/he thinks is detrimental to her / his patient. If no such individual exists, the potential researcher should list the potential *conflict of interest* as a possible hazard.

**SELECTION OF SUBJECTS**

Selection of participants for research should be equitable. Researchers should be cognizant of the special problems of research involving vulnerable populations such as children, prisoners, pregnant women, mentally disabled persons, or economically or educationally disadvantaged persons.

(See *The Requirement of Fair Selection of Subjects* -page 15)

**INFORMED CONSENT**

No investigator may involve a human being as a subject in research unless s/he has obtained the legally and ethically valid informed consent of the subject or the subjects, or the subject's legally authorized representative. An investigator shall seek such consent in ways that minimize the possibility of coercion or undue influence.

The right of the research subject to safeguard her / his integrity must always be respected.

The following information shall be provided to each participant in research:

- 1) A statement that the study involves research, an explanation of the purposes of the research and the expected duration of the subject's participation, a description of the procedures to be followed, and identification of any procedures which are experimental;
- 2) Any random assignment of participants to trial treatment arms of the research;
- 3) A description of any reasonably foreseeable risks or discomforts to the subject;
- 4) A description of any benefits to the subject or to others which may reasonably be expected from the research. Where there are no anticipated direct benefits to the participant, the participant should be so informed;
- 5) A disclosure of appropriate alternative procedures or courses of treatment, if any, that might be advantageous to the subject;
- 6) A statement describing the extent, if any, to which confidentiality of records identifying the subject will be maintained;
- 7) For research involving more than minimal risk, an explanation as to whether any compensation and medical treatments are available if any injury occurs, and, if so, what they consist of or where further information may be obtained;
- 8) Any pro-rated payment to be made to the subject for participating in the research;
- 9) The anticipated expenses, if any, to the subject for participating in the research
- 10) The approximate number of participants expected to be involved in the trial;
- 11) Any foreseeable circumstances under which the subjects' participation in the research may be terminated;
- 12) A statement that the subject, or the subject's legally authorized representative, will be informed in a timely manner of any new information that may be relevant to the subject's willingness to continue participating in the research;
- 13) An explanation of whom to contact for answers to pertinent questions about the research and participants' rights, and whom to contact in the event of a research-related injury to the participant;
- 14) A statement that participation is voluntary, and that refusal to participate will involve no

penalty or loss of benefits to which the participant is otherwise entitled, and that the subject may discontinue participation at any time ,without penalty or loss of benefits to which s/he is otherwise entitled.

Before informed consent may be obtained, the investigator, or a person designated by the investigator, should provide the participant or the participant's legally authorized representative ample time and opportunity to inquire about details of the research and to decide whether or not to participate in the research.

If a subject is unable to read, or if a legally authorized representative is unable to read, a witness not connected to the research protocol should be present during the entire informed consent discussion.

The written informed consent form should be signed and personally dated by the participant, and by the person who conducted the informed consent discussion.

None of the oral and written information concerning the research, including the written informed consent form, should contain any language that causes the subject or the subject's legally authorized representative to waive or to appear to waive any legal rights, or that releases or appears to release the investigator, the institution, the sponsor, or their agents from liability for negligence.

### **CONFIDENTIALITY**

Confidentiality in research must not be breached without the participant's consent, and it imposes the duty on researchers of effectively securing any access to participants' personal information. Records that may identify subjects must be kept safe and confidential, and, to the extent permitted by applicable local laws and / or regulations, should not be made publicly available.

### **SUPER VISION OF RESEARCH TRAINEES**

Careful supervision of research trainees by their mentors is required. Each trainee should have a designated primary scientific mentor. It is the responsibility of this mentor to provide a training environment in which the trainee has the opportunity to acquire both the conceptual and technical skills of the field. Research undertaken by trainees should involve discussion between the mentor and the trainee, and should have the potential to yield new knowledge of importance in that field. The mentor has the responsibility to supervise the trainee's progress closely, and to interact with the trainee on a regular basis. Trainers must impart appropriate standards of scientific conduct by instruction and example to trainees. (See Appendix I: University Policy on Student Involvement in Research)

### **RESEARCH ON MEDICAL RECORDS**

Research to be done on medical records will require the approval of the Head of the Medical Records Department of the University Hospital of the West Indies (UHWI). Such research protocols should be submitted to the FMS/UHWI Ethics Committee with an application for an exemption from committee review if there will be no personally identifying information in the study. Research by students should be supervised by Faculty, University Hospital staff, or an investigator attached to the Faculty of Medical Sciences or the University Hospital of the West Indies.

Researchers from other institutions wishing to use the resources of the Faculty of Medical Sciences or the University Hospital of the West Indies will be required to include the collaboration of a Clinical Department of the FMS/UHWI, and to submit their protocols for research ethics review.

### **RELATIONSHIP WITH COLLEAGUES**

It is the duty of investigators to present the materials of their research in scholarly ways. Criticisms of colleagues should be restricted to relevant scholarly and academic matters, and should always be made in a spirit of mutual respect.

Senior researchers should consider it their duty to advise less experienced colleagues.

Due acknowledgement for assistance in research and facilities of all kinds should be recorded in all publications. In cases of joint work leading to publication or exposure in any form, due credit should be given to each of the contributors according to their fair measure and genuine input.

### **AUTHORSHIP**

#### a) Attribution of authorship

Authorship is attributed to all those persons who have made significant scholarly contributions to the work and who share responsibility and accountability for the result.

The main criterion for co-authorship of a manuscript is that the co-author has made a significant intellectual or practical contribution to the paper. The attribution of authorship is not affected by whether researchers were paid for their contributions or by their employment status.

#### b) Duties of the principal Author

The first author should review all the primary data on which the report is based, and be able to defend all aspects of the study.

The submitting author should be considered the primary author with the additional responsibility of co-ordinating the completion and submission of the work, satisfying pertinent rules of submission, and co-ordinating responses of the group to inquiries or challenges. The submitting author accepts the responsibility of having included as co-authors, all persons who are entitled to co-authorship, and including none who are inappropriate.

The submitting author should send each co-author a draft copy of the manuscript and should make a reasonable attempt to obtain consent to co-authorship, including the order of names. Other contributions should be indicated in a footnote or *Acknowledgement* section, in accordance with the standards of the discipline and the publisher:-

c) Ownership of copyright

In the absence of an agreement between the researchers, the allocation of copyright is governed by University policy and the law.

### **PEER REVIEW**

Peer review is the expert critique of a scientific treatise (such as an article prepared or -submitted for publication), a research grant proposal, or an investigator's research programme. Scientists have an obligation to participate in the peer review process when called upon to do so, and, in doing so, they make an important contribution to science. Peer reviewers should be experts in the subject under review, and should avoid any real or perceived conflicts of interest that might arise because of a direct, competitive, collaborative or close relationship with one or more of the authors of the material under review.

### **COLLABORATIVE RESEARCH**

a) ***Attribution of Authorship and Copyright Ownership***

Research collaborators should establish as early as possible, the relative contribution of the researchers and how the attribution of authorship and the allocation of copyright are to be divided between them.

An administrative relationship to the investigation does not of itself qualify a person for co-authorship.

b) ***Student -Staff Collaborations***

The rules in (a) apply to the case where the collaborators are staff and student. A student should be granted due prominence on a list of co-authors of any multiple-authored article that is based primarily on the student's own dissertation / thesis according to the practice in the discipline

The staff -student relationship is one of inequality, in which the member of staff usually possess the advantage. Staff should therefore be scrupulous not to exploit the relationship to their advantage, and in their published work should make appropriate acknowledgement of any assistance they have received from students.

(See Appendix I: University Policy on Student Involvement in Research)

c) ***The Duty to Acknowledge Sources of Funding***

All public and private funding sources (grants, contracts, and gifts, including endowed income that fund named chairs) used in the conduct of research should be acknowledged in resulting publications.

d) ***The Duty of Co-Researchers to resolve Disputes***

Where disputes between co-researchers arise, they should be resolved amicably and in a respectful and collegial fashion. Where a dispute cannot be resolved by the parties themselves, they should seek the advice of the appropriate authorities in their unit to effect conciliation, mediation, and binding or non-binding arbitration.

## **SCIENTIFIC MISCONDUCT**

Any form of academic dishonesty is a serious offence.

Misconduct in science is defined as fabrication, falsification or plagiarism in proposing, performing or reporting research data.

Fabrication refers to inventing or concocting data or results. Falsification refers to fraudulently altering or misrepresenting data or results. Plagiarism is using the ideas or words of another person without giving appropriate credit.

Misconduct does not include errors of judgment, errors in the researching, selection, or analysis of data, or differences in opinions involving the interpretation of data or misconduct unrelated to the research process.

## **THE DUTY OF HONESTY AND INTEGRITY**

Researchers are expected to maintain the highest standards of honesty and integrity

### a) ***Falsification and Plagiarism***

Researchers should never publish as true, data they know to be false or that are the result of deliberate acts of falsification.

Researchers should not knowingly represent the published or unpublished work of another person as their own or assist anyone else in doing so. Use of work done by other people must be appropriately and adequately acknowledged. Plagiarism is an act of academic dishonesty and is considered to be misconduct meriting the most severe disciplinary penalties.

Upon the demonstration that a researcher has misappropriated another person's work and represented it as his / her own, the researcher would bear the burden of rebutting by evidence to the satisfaction of the person or body hearing the case.

b) ***Conflict of Interest***

A conflict of interest may arise when the researcher has a material interest -personal, financial, career or otherwise -that may conflict with the researcher's duty of honesty and integrity. Where a conflict of interest of a financial nature arises, the researcher has the duty to disclose that interest to his / her superior and to all other persons to whom it should be disclosed, where the relevant circumstances are not a matter of public knowledge.

(See Appendix II: University Conflict of Interest Disclosure Form)

c) **Misuse of Research Funds**

Where a research funding body provides guidelines on the use of research funds, researchers and directors of research projects must follow those guidelines scrupulously. Researchers and directors of research must also follow all university guidelines on the management and disbursement of funds. Regardless of the source of research funding, it is not permitted to divert research resources for personal use, except in cases where the grant or contract specifically provides otherwise.

**DUTIES REGARDING RESEARCH WITH HUMAN AND ANIMAL SUBJECTS**

a) ***Human Subjects***

Research involving human subjects must be carried out in accordance with the highest standards of conduct. It must be conducted in an ethical manner that respects the autonomy and rights of the persons who are the subjects of the research and in accordance with the rules and guidelines prescribed by research funding bodies, the laws of the country, and the University

b) ***Animal Research***

All animal research must be conducted in compliance with the University's guidelines on the use of animals for research and teaching.

### **DISCIPLINARY ACTION AND GRIEVANCE**

Any allegation of misconduct made against a member of the University, shall be dealt with in accordance with the University's legal instruments (for example, Ordinance No.8 and the Students' Charter).

### **FUNCTIONS OF THE RESEARCH ETHICS COMMITTEE**

The Research Ethics Committee will categorize research into the following categories:

- Observation studies or systematic collection of routine clinical data where *NO* additional procedure is performed on the subject of the research
- Studies with *MINIMAL* risk that may lead to information that is beneficial in the management / treatment of the *INDIVIDUAL* subject
- Studies with *MORE* than minimal risk where there may be an immediate and personal benefit for the *INDIVIDUAL* subject
- Studies with *MINIMAL* risk where the objective is an increase in knowledge *WITHOUT* there being any benefit to the participating subject
- Studies with *MORE* than minimal risk where the results will *NOT* benefit the individual patient



Studies judged to be in the first two categories, will be quickly expedited (within 2 weeks) by the research ethics committee. Those in categories 3: and 4 may take longer. For studies falling under category 5, it is likely that the principal investigator will be asked to appear before the research ethics committee. This may take up to two months to arrange.

The research ethics committee reserves the right to impose restrictions on the research protocol. The committee may also monitor on-going research.

The committee should be informed by the principal investigator (who is responsible to the ethics committee for the ethical conduct of the research) if any untoward occurrence is noticed, if the procedures deviate from that which was originally approved by the committee, if an alteration of the protocol is desired, or if the principal investigator, for any reason, no longer has full day-to-day control of the research procedure.

The research ethics committee will keep a file of all proposals submitted to it. This file will be open to inspection by all members of the Faculty.

Any person, who feels that a research project is unethical, has the duty to present her / his concerns to the ethics committee in writing. The committee will then review the ethical aspects of the research, investigate the concern, and take whatever action it considers appropriate.

### **REVIEW OF PROPOSALS FOR RESEARCH**

Particularly when studies involve human subjects, the research ethics committee should evaluate and, if satisfied, endorse the research, preferably before the proposal is submitted to any research grants program.

For this purpose, the form for research involving human subjects should be filled out, and care should be taken to attach the informed consent form which should be signed by the subjects involved in the study.

## **EXEMPTIONS FROM ETHICS COMMITTEE REVIEW OF RESEARCH PROTOCOLS**

Review of the research protocol and exemption from ethics committee review may be granted by the Chairman of the Ethics Committee, or his/her designate. He/she will assume the authority of the ethics committee, excepting that s/he may not disapprove any research, but should refer dubious research to the ethics committee for evaluation.

Research whose protocols are granted exemption from review by the ethics committee will be notified expeditiously.

Those protocols that are not granted exemption will be submitted to the Ethics Committee for possible expedited review.

### **Guidelines for Exemption:**

Research activities that may qualify for exemption include:

- Research on the effectiveness of instructional techniques, curricula, or management methods;
- Research involving interview and survey procedures, observation of behaviour, or educational tests, where participants are not personally identifiable;
- Research involving study of publicly available data, documents, records, and diagnostic and pathological specimens, or where the recorded information does not render participants personally identifiable;
- Research involving the review of medical records if the information collected is recorded in such a manner that subjects cannot be identified. Such research should be supervised by Faculty, University Hospital staff, or an investigator attached to the Faculty of Medical Sciences or the University Hospital of the West Indies.

If personally identifying information is to be recorded, ethics committee review of the research will be required.

### **Existing Data**

Research on existing blood samples or tissue for which additional information must be obtained from patients' medical records will not qualify for exemption.

## **GUIDELINES FOR PREPARING RESEARCH PROPOSALS**

The following information will be required for the consideration of research proposals:

- 1) TITLE OF THE RESEARCH PROPOSAL

- 2) **DATE** (And version -if there has been a previous submission)
- 3) **NAME AND DEPARTMENTS OF INVESTIGATORS, COLLABORATORS, AND/OR SUPERVISORS** (starting with the principal investigator). *Indicate which parts of the protocol each investigator will be responsible for, who will actually be carrying out any procedures on patients, and, if appropriate, what training they have had.*
- 4) **PLACE(S) OF RESEARCH** (The research ethics committee may be interested in the facilities available for subjects' comfort, and those available for emergency procedures in the event of an unanticipated occurrence)
- 5) **SUMMARY OF THE STUDY** (not more than 250 words)

This should include:

- a. *The usefulness and significance of the study*
- b. *The hypothesis and scientific basis or justification for the study* c. *An outline of the study design*
- d. *An assessment of the benefits (to participants and/or groups in the community or the entire community) and the risks*
- e. *An indication of steps taken to ensure and maintain confidentiality*

## 6) **THE PROJECT PROPOSAL**

- A) Introduction and background information on the research topic
- B) A clear statement of the Objectives of the research proposal
- C) Justification for the research:

*This should include a review of the current knowledge from the literature on the topic, with an explanation of why this project is necessary, and how it will contribute to the overall knowledge in this area*

### D) Materials and Methods:

- *Details of procedures to be performed* (for example, the volume of blood, frequency, timing, and possible site of venepuncture; any drug administration, physiological measurements, etc.)
- *Choice of subjects, inclusion (and exclusion) criteria, number of subjects (and, where appropriate, a justification for that number), controls, etc.*

- *Procedures to be performed on human subjects:*
  - i) *Which procedures are new (i.e. experimental), and which are routine procedures that would have been done on the subjects, even if they were not involved in the study*
  - ii) *Which procedures may cause pain and / or discomfort for research subjects*
- *Procedures for obtaining informed consent, and a copy of the informed consent form*
- *Methods to protect the confidentiality of the subjects, and methods to ensure that a subject who opts out of the study is well protected as far as normal health care delivery is concerned*
- *Data collection and analysis*
- *Relevant references (i.e. literature cited)*

7. **THE CHECKLIST OF INFORMATION FOR REVIEW OF RESEARCH INVOLVING HUMAN SUBJECTS** (See Appendix III)

8. **THE REQUIREMENT OF FAIR SELECTION OF SUBJECTS**

A statement that subjects were selected only because of the specific problem under investigation, and not because of easy availability, diminished autonomy, or social bias. (This ethical principle ensures that the benefits and burdens of medical research are distributed fairly [distributive justice])

9. **FMS/UHWI GUIDELINES FOR THE CONDUCT OF RESEARCH**

A statement that the principles enunciated in the FMS/UHWI *Guidelines for the Conduct of Research* have been complied with.

**ACHIEVING INFORMED CONSENT**

The *INFORMED CONSENT FORM* must include the following:

- a. Statements outlining in lay language the purpose of the research, what will be done in the study, and indicating that this has been explained orally and in writing to the participant (or the participant's parent or legal guardian -if a child) who understands what will be done. These must be countersigned by the participant or his/her legally authorized representative~
- b. Explicit statements about any risks or discomfort to the participant, with an assessment of the degree of risk, and viable alternative

- c. A statement that the subject's participation is voluntary, and that refusal to participate or (if after having agreed to participate) withdrawal from the study at any time will not affect the participant's access to or the type of care to which he or she is entitled~
- d. The name, address, telephone and fax numbers, and email address of a contact person;
- e. A statement confirming that time was given for the participant to consider her / his involvement;
- f. Statements that the participant or her/his legal guardian has read the informed consent form, or that it has been read to her/him, and that s/he understands its contents~ that a copy will be given to the participant; and that the signature of the participant or the legal guardian indicates that s/he has freely agreed to participate;
- g. The signature of a witness to the consent procedure who is not connected to the research protocol.

(See details of *Informed Consent* on page 4)

## **POLICY ON STUDENT INVOLVEMENT IN RESEARCH**

The following policy relates specifically to undergraduate and graduate students who are engaged in research as part of their university programs. Some sections also apply to those cases where an investigator enlists the services of an inexperienced person as assistant, technician, trainee, etc. in connection with a research project.

### **Health and Safety**

- 1) It is the responsibility of the investigator to implement all possible measure that will ensure the health and safety of his/her research colleagues. Such measures include:
  - a) Strict adherence to the safety procedures set forth in any regulations of the building in which the research is being carried out.
  - b) Careful training of all new personnel in the correct usage of equipment a materials.
  - c) Provision of adequate protective clothing, first aid kits, etc. and their regular inspection.
  - d) Clear precautionary labeling of containers of hazardous materials
- 2) Students, especially undergraduates, tend to have only temporary involve men with a research project and may be absent during routine safety drills particularly, attention should be given to the instruction of each beginning student. Solitary work in laboratory containing potential hazards should be strongly discouraged. Research projects shall avoid a requirement for solitary after-hours work. ..
- 3) Where research projects involve the use of specially hazardous materials (e.g radioactive, carcinogenic or poisonous chemicals) departments shall ensure tha1 students have signed a statement that they have received and read appropriate health and safety information.

### **Academic considerations**

- 1) When a student assists in a research project, a clear distinction should be made between work for which the student is paid, and research training which contributes to the student's academic program.
- 2) As a general rule, paid work should not be considered eligible for credit towards and undergraduate course. In some department, different arrangements have traditionally been held; in such department open discussion should ensure that one policy is applied uniformly throughout the department and disseminated to students.

- 3) When a graduate student is assigned a salary or partial support by the investigator (e.g. from an operating grant or similar fund controlled by the investigator) a clear agreement should be made as to the duties expected of the student in conjunction with the investigator's own research project vis-a-vis the work contributing to the student's thesis.

### **Secrecy**

When a student begins working with an investigator who may be funded in whole or in part by contracts, consulting agreements or grants from outside agencies, a clear agreement should be made at the outset as to the accessibility of research findings for publication.

### **Responsibilities of the Student**

Academic freedom brings responsibilities to students and staff alike. Students should realize that the good name and research reputation of the University and its professors rests in large measure upon the quality of research done by its students.

### **Responsibilities of the University**

- 1) The University shall inform students of all appropriate regulations and policies concerning research.
- 2) The University shall provide researchers a safe research environment for student researchers.

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