



Ph.D. Program guidelines and codes of practice book

***Stazione Zoologica “Anton Dohrn”
National Research Institute in the field of
Marine Biology, Ecology, and Biotechnologies***

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AUTHORSHIP AND INTELLECTUAL PROPERTY CODE OF CONDUCT

This code is inspired by and links to the following regulation of the SZN, which should be consulted in conjunction:

- [“Scientific Publication Policy, Rights and Obligations at the SZN”](#)
- [“Internal regulations for the protection of intellectual property \(patenting\) at the SZN”](#)
- [“Ethic Code”](#)

Definition of the topic

Authorship of an intellectual work belongs to those individuals who have contributed substantially to the work. We define a work as an intellectual creation which reports novel findings and/or inventions in the form of an editorial product or a patent.

Intellectual property (IP) represents the body of rules which recognize the ownership of a discovery/invention. IP must be considered independently of the authorship and regulated by specific institutional rules. SZN employees do retain the authorship for their findings and/or inventions but the ownership does belong to the SZN, unless differently stated in specific agreements.

Why a code of conduct is needed

Authors and inventors are always persons, while owners of inventions are often organizations or third parties who funded the work of the authors. However, although such rights are normally defined before the work is done, it is necessary to know how to determine these aspects for the appropriate allocation of authorship and IP rights and to prevent possible disputes.

Examples of problematic situations

- A student claims authorship for a published article in which his/her name does not appear among authors.
- A researcher claims authorship for a discovery which is at the basis of the work of other colleagues.
- A technologist claims contribution to the technical developments which led to a novel technique for which the institute is filling a patent.

Rights and responsibilities

It is made clear here that authorship is a right that must be granted to every single person contributing substantially to a work, regardless of his/her institutional position. The solution of any dispute regarding such topic is often long and difficult and requires the evaluation of the facts and reports by third parties. It is therefore ***responsibility of***, and ***of primary interest for***, every individual to constantly maintain clear, reliable and updated track of their everyday work.

Code of conduct

In case of any problem and/or dispute in the attribution of authorship and or IP, the general complaint procedure rules apply. It is nevertheless important that personnel involved in contributing to any kind of intellectual work align to the following guidelines.

Students

Students are the primary producers of results and therefore they should be preserved by any action directed in negating the authorship on the works deriving by their production. To this end, it is fundamental that students keep their lab-book and notes updated with daily integrations containing proof of their results and reasoning. At the same time, they should understand how to evaluate and give the right weight to their contribution to a specific work.

Staff

Researchers and technologists take the lead and coordinate the discovery process and therefore have under their control and responsibility the entire process. They must be impartial in the definition of authorships and their role is fundamental for teaching students how to evaluate the weight of contributions in a work.

CODE ON PLAGIARISM

The definition of plagiarism can be stated in these terms: deliberate use of material published by others, omitting the appropriate quotation. It is also known as the total or partial appropriation of ideas and discoveries of others. Plagiarism is one of the most frequent cases of scientific misconduct.

If one uses a work that is not its own, without indicating the person who produced it (thus not recognizing its origin), they are committing plagiarism, which is a criminal offense. It must be understood that scientific misconduct also damages the reputation of the SZN and therefore institutional actions must be provided for. Italian laws provide a stringent legislation for plagiarism embodied in the so called ‘copyright’ (*Legislative Decree of 29 December 1992 n. 518*).

It is mandatory to appropriately indicate the source of the information that has led to the product, in all the scientific outputs of the research activity (i.e., thesis, reports, publications). The use of these sources without such declaration is considered plagiarism. This means that everybody must make it clear that such words and ideas belong to those who have produced them, or at least that they are coming from another source, by using quotation marks and/or appropriate citations in any published text.

Examples of plagiarism (if without reference to the source)

- use of sentences taken from publications of other authors
- paraphrasing of sentences or concepts of others
- use a text downloaded from the internet
- use of statistics or assembled data from another person or source
- reproduction of Figures, Tables, or charts from publication by others

A special case of plagiarism is the self-plagiarism, in which authors publish repeatedly the same material. This case has different degrees of culpability: while duplication of publications is a clear case of scientific misconduct, the repetition of sentences, in sections such as the Methods, is not necessarily fraudulent.

Procedure for plagiarism cases

All PhD students and supervisors must avoid plagiarism in their work. Any breach will be formally reported to the *Ufficio Procedimenti Disciplinari* of SZN.

Any person who becomes aware of a case of plagiarism should report it to the PhD Coordinator in written, with supporting evidence. The PhD Program Coordinator will examine the case together with the PhD Steering Committee and will decide whether there is sufficient ground for investigation.

In this case, a written report will be sent to the President, the General Director and to the Chief of the *Ufficio Procedimenti Disciplinari* for formal actions at the institutional level.

See also SZN regulation on:

- [“Scientific Publication Policy, Rights and Obligations at the SZN”](#)
- [“Internal regulations for the protection of intellectual property \(patenting\) at the SZN”](#)
- [“Ethic Code”](#)

Website tools for detecting plagiarism cases

Turnitin.com

Plagiarisma.net

Compilatio.net

JGAAP (Java Graphical Authorship Attribution Program)

CODE OF PRACTICE FOR RESEARCH

The SZN PhD Program abides to the Open University Code of Practice for Research, which can be consulted at <https://www.open.ac.uk/students/research/forms-and-guidance>.

The present Code of Practice sets out the standards that regulate the conduct of research activities within the SZN PhD Program. It links to related local documents, which should be consulted in conjunction with this policy:

- [Body of Rules of the OU-SZN PhD Program](#)
- SZN PhD Program Research Integrity Code
- SZN PhD Program Code for Authorship and Intellectual Property Rights
- SZN PhD Program Code against Bullying and Harassment
- SZN PhD Program Code against Plagiarism
- SZN Health and Safety Rules
- SZN PhD Program Complaints and Appeal Code
- [SZN Rules of the Animal Welfare Body](#)
- [SZN “Scientific Publication Policy, Rights and Obligations at the SZN”](#)
- [SZN “Internal regulations for the protection of intellectual property \(patenting\) at the SZN”](#)
- [SZN “Ethic Code”](#)

And all other related policies and information where appropriate.

In general, the SZN, as a Public Research Institute, abides to the Italian Law for:

- Prevention and Repression of corruption and illegal conduct in the Public Administration (Law 190/2012);
- Conflict of interest in public administrations and others (Legislative Decree 39/2013);
- Code of Conduct for Civil Servants (Presidential Decree 62/2013)
- Code for working in public bodies (Legislative Decree 165/2001)
- National Contract for Universities and research Institutions (CCNL Personale Comparto Istruzione e Ricerca triennio 2016-2018 del 19/04/2018) and following modifications

Introduction

Research within the SZN PhD Program is based on principles of high standards, honesty, openness, accountability, integrity, inclusion, and safety. The SZN PhD Program expects high standards of personal conduct from all those engaged in research activities, and its research environment is one where excellence and high ethical standards are promoted.

It is applicable to all those who conduct, supervise or support research in the PhD Program’s name, including staff, students and other individuals working on SZN premises or using SZN facilities.

All those to whom the Code is applicable are expected to work in accordance with it.

Responsibilities

Researchers, including members of staff and research students, are responsible for:

- Leadership in maintaining best practice standards among all members of their teams;
- Demonstrating good practice in all aspects of their research;
- Maintaining awareness of the relevant policies and procedures of the SZN and in particular of the PhD Program;
- Ensuring that their research complies with these policies and procedures, seeking guidance if needed, and reporting any concerns to the proper person;
- Engaging with opportunities for training and development.

The SZN PhD Program abides to the Open University Research Code of Practice which can be found at: <https://www.open.ac.uk/research/sites/www.open.ac.uk.research/files/files/Documents/research-code-of-practice-final-2021.pdf>

The SZN, its researchers and students must comply with all legal and ethical requirements relating to their research and highlighted in the [SZN Ethic Code](#), such as those regarding:

- Collection and manipulation of human samples
- Research involving animals (see the SZN Animal Welfare Code)
- Personal Data Protection Act
- Freedom of Information and Environmental Information Act
- Copyright and Intellectual Property Rights
- Authorship, publication and access to research outputs
- Conflict of Interest

Advice

Researchers who have questions about how the provisions of this code of practice apply to their research should seek advice from their line manager, Director of Department/Unit, or PhD Program Coordinator, or if a research student, from their Director of Studies, Supervisor(s), or the PhD Program Coordinator. If these routes are not appropriate, the SZN Prevention of Corruption and Openness Officer, the Chief of the Disciplinary Actions Office, or the Ethic Commission will provide assistance.

Allegations of academic malpractice or misconduct

Academic misconduct or malpractice means any breach of the SZN PhD Program Code of Conduct or the other national or local Codes indicated above, including but not limited to:

- fabrication or falsification, including the creation of false data, imagery of other aspects of research, including documentation and/or participant consent, and the inappropriate manipulation/selection of data, imagery, documentation and/or consents;
- dishonesty in proposing, carrying out or reporting results of research, including suppression of relevant findings or data, and misrepresentation of data and/or interest and/or involvement;
- plagiarism, including the general misappropriation or use of others' ideas, intellectual property or work (written or otherwise produced) without acknowledgement or permission;
- deliberate, dangerous or negligent deviation from accepted research practice;

- failure to follow agreed protocols or accepted procedures, or to exercise due care, including:
 - (i) failure to exercise due care in carrying out responsibilities for avoiding unreasonable risk or harm to humans, animals used in research or the environment;
 - (ii) failure to properly handle privileged or private personal information collected during research;
 - (iii) facilitation of misconduct in research by collusion in, or concealment of, such actions by others;
 - (iv) failure to comply with SZN policies regarding ethical review;
 - (v) intentional non-compliance with: the terms and conditions governing the award of external funding for research; the SZN policies and procedures relating to research, including accounting requirements, ethics, and health and safety regulations; or any other legal or ethical requirements for the conduct of research.

The SZN PhD Program, through its Steering Committee, takes seriously and considers fairly all concerns about its conduct of research that are raised in good faith. It believes that staff and students should be able to raise legitimate concerns without fear of their position within the SZN being jeopardized.

The PhD Program Coordinator at SZN oversees the conduct of research activities within the PhD Program, acting as the first point of contact for information on matters of research misconduct or malpractice, and he/she is responsible for the investigation of any allegations of research malpractice or misconduct within a PhD research project. In such cases, evidence will be collected and considered by the PhD Steering Committee which will report to the SZN Prevention of Corruption and Openness Officer, or the Chief of the Disciplinary Actions Office, and to the President and General Director of the SZN to take further action at the institutional level.

Reasonable suspicions about irregularities in the running of the SZN or of the activities of its employees can also be raised via <https://whistleblowing.szn.it/#/>

RESEARCH INTEGRITY POLICY

This code is inspired by the Open University Research Integrity Statement and documents therein indicated.

The SZN PhD Program is committed to achieving excellence in research and scholarship. The pursuit of excellent research and the fulfilment of our responsibilities to participants in research, research users and the wider community requires the maintenance of the highest standards of integrity and ethics.

The information below sets out the principles to which all research and scholarship belonging or affiliated to the PhD Program should adhere and provides guidance on where to seek further advice on specific research integrity issues.

It is expected that all researchers, be they staff, students or visitors to the SZN adhere to SZN Sets of Rules regarding Ethics and Research conduct, and in particular to the [Ethic Code](#) and the [Scientific Publication Policy](#).

It is also expected all actors mentioned above, to abide by national, European and international standards of research integrity.

This includes:

- Honesty in all aspects of research, including:
 - presentation of research goals, intentions and findings
 - reporting on research methods and procedures
 - gathering data
 - using and acknowledging the work of other researchers and/or students
 - conveying valid interpretations and making justifiable claims based on research findings.
- Scrupulous care, thoroughness and excellence in research practice:
 - in performing research and using appropriate methods
 - in adhering to an agreed protocol where appropriate
 - in drawing interpretations and conclusions from the research
 - in communicating the results.
- Transparency and open communication:
 - in declaring conflicts of interest
 - in the reporting of research data collection methods
 - in the analysis and interpretation of data
 - in making research findings widely available, including sharing negative results as appropriate
 - in presenting the work to other researchers and to the general public.
- Care and respect for:
 - all participants in and subjects of research, including humans, animals, the environment and cultural objects
 - the stewardship of research and scholarship for future generations.

In addition to these core principles, researchers should ensure that their research is conducted according to appropriate ethical, legal and professional frameworks, obligations and standards. This includes seeking ethical approval for research where appropriate. Researchers are also expected to treat colleagues with integrity, honesty and collegiality, including the fair provision of references and peer review.

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The SZN PhD Program, through its Committee, takes seriously and considers fairly all concerns about its conduct of research that are raised in good faith. It believes that staff and students should be able to raise legitimate concerns without fear of their position within the SZN being jeopardized.

The PhD Program Coordinator at SZN is in charge of overseeing the conduct of research within the PhD Program. He/She acts as the first point of contact for information on matters of research integrity, and he/she is responsible for the investigation of any allegations of research malpractice or misconduct within the PhD Program. In such cases, evidence will be collected and considered by the PhD Steering Committee that will report to the President of the SZN for his/her further action at the institutional level. A communication will also be sent to the SZN Disciplinary Actions Office and, if the case, to the SZN Ethic Committee.

Reasonable suspicions about irregularities in the running of the SZN or of the activities of its employees can also be raised via <https://whistleblowing.szn.it/#/>.

COMPLAINTS AND APPEALS CODE

The Stazione Zoologica Anton Dohrn (SZN) aims to provide all students with an excellent learning experience that enables them to achieve their study goals. However, sometimes students have a query or a problem with any aspects of their relationship with the Institute or have grounds to believe that a decision made in relation to them is inappropriate. The Student Complaints and Appeals Procedures enable the students to bring matters of concern about their learning experience to the attention of the SZN and provide mechanisms through which those concerns may be resolved. The procedures aim to be simple, clear and fair to all parties. Complaints and Appeals (both informal and formal) will be handled sensitively and with due consideration for confidentiality. The details will only be shared with staff who need to be informed in order to investigate and respond to the issues that have been raised. No student who brings a genuine complaint or appeal under this procedure will be disadvantaged by the SZN, regardless of the outcome.

What is a complaint?

A complaint is “an oral or written expression of dissatisfaction concerning the provision of a programme of study or related academic or administrative service, which is not an appeal against a decision”.

The following are some examples of issues, which may give rise to complaints.

- inadequate supervision¹.
- delay in the feedback from supervisors².
- non-availability of essential equipment or resources necessary to complete the work*.
- plagiarism of the student's research (see separate code).
- unauthorized disclosure of confidential information to a third party.
- bullying and harassment (see separate code).
- racist behavior or activity.
- any action likely to cause injury or impair the safety of the student.

What is an appeal?

An appeal is a request for a review of a decision taken by an individual or body charged with making decisions about any aspect of a student's access to learning or learning experience, assessment, student progression, thesis submission and the award.

Preliminary attempts to solve the problem

In some situations, when students are not satisfied with the PhD experience at the SZN, mediation can be an alternative route to resolving matters of concern. The first step is always an attempt to raise and resolve the issue informally with the people concerned. If the student experiences problems with any aspect of the academic or administrative services, he/she should discuss them with the supervision team and the Third-Party Monitor (TPM) as soon as possible. In case the first step has not been proved useful, the student might consider putting forward a formal complaint or appeal procedure.

Students are encouraged to raise issues at an early stage. This is particularly important since delay

¹ In this case, other than in exceptional circumstances, it is expected that a formal complaint should not be made on the basis of an isolated incident but that there would be evidence of a continuing problem before the complaint is pursued.

² The above also applies.

may create problems in the subsequent investigation. Complaints must be made before the final thesis examination and cannot constitute grounds for appeal against the outcome of the examination.

Group complaints

If a group of students wishes to submit a joint complaint, a spokesperson is nominated to correspond with SZN on behalf of the group. All complainants must submit their written authorization to the spokesperson, together with the group complaint. A complaint will only be dealt with as a group complaint if the same issue equally affects all the students in the group. A single response will be given to a group complaint.

STAGE 1: Informal procedures

The first step is to contact the TPM, who will decide whether to inform the PhD Coordinator or deal with the complaint/appeal alone. The TPM will contact the parties, as often cases are based on misunderstandings and can be solved when the parties are confronted and can discuss their respective points of view. The TPM here has the role to facilitate a constructive confrontation of the parties. In difficult cases, the PhD Coordinator can support this action further. In the experience of similar entities, most of the complaints are solved at this stage.

STAGE 2: Formal procedures

Any formal complaint/appeal shall be made in writing and addressed to the PhD Program Coordinator within 28 days of the occurring issue or the student being notified of the decision. If the complaint relates to the PhD Program Coordinator, it shall be addressed to a member of the PhD Steering Committee. The receiver of the complaint will convene a meeting of the PhD Steering Committee to examine the case and plan for further action.

The PhD Program Coordinator shall forward the complaint/appeal to: i) the student's Director of Studies, ii) any member of staff against whom the complaint/appeal is made or who is responsible for taking action to redress it (hereinafter “the member(s) of staff directly involved”), iii) the PhD Steering Committee and iv) the Director of the Department in which the student is working. In case the complaint/appeal relates to the Department Director, it shall be copied to the General Director of the SZN. If the complaint/appeal relates to the General Director, it shall be copied to the President.

Any member(s) of staff directly involved shall have the opportunity to respond to the complaint/appeal in writing, normally within five working days from the reception of the notification. The PhD Program Coordinator and the PhD Steering Committee shall examine the complaint and take the necessary steps, including taking written evidence, to establish and clarify the nature of the complaint/appeal. In particular, they might determine:

- that the complaint/appeal is inappropriate within the grievance procedure and should be dismissed;
- that the complaint/appeal might be resolved amicably, in which case they shall endeavor to do so;
- that the complaint/appeal is upheld.

One member of the PhD Steering Committee will be in charge of writing a full and complete report of all actions taken, including specific recommendations towards a solution of the problem. If the complaint is upheld, the PhD Program Coordinator shall forward the written report to the President and the General Director of the SZN for further action at institutional level.

The PhD Program Coordinator shall make the decisions of the Committee known in writing to the student, normally within fifteen working days from the reception of the written complaint/appeal.

The final decision shall be copied to the Members of the PhD Steering Committee, the student’s Director of Studies and any member(s) of staff directly involved.

Anonymous complaints will not be accepted, as complaints can only be investigated properly when full and clear background information can be gathered.

If the problem remains unsolved after that the SZN internal procedures have been completed, the student may address the complaint/appeal to The Open University.

Recommendations

Complaints and appeals must be set out clearly, stating the problem and including any details of specific events. Any evidence that may support the complaint/appeal must be provided.

CODE FOR DEALING WITH BULLYING AND HARASSMENT

This code is inspired by the Open University Code for Bullying and Harassment.

Introduction

The PhD Program commits to ensure that all complaints of bullying or harassment will be treated seriously and thoroughly investigated.

Cases of alleged serious criminal offence, such as physical and sexual assault, must be immediately reported to the Police.

What are bullying and harassment?

There are many definitions of bullying and harassment:

- Bullying can be defined as offensive, intimidating, malicious or insulting behaviour, an abuse or misuse of power through means intended to undermine, humiliate, denigrate, or injure the recipient.
- Harassment can be defined in general terms as unwanted conduct affecting the dignity of men and women. It may be related to age, sex, race, disability, religion, nationality, or any personal characteristic of the individual, and may be persistent or an isolated incident. The key is that the actions or comments are viewed as demeaning and unacceptable to the recipient.

Some behaviour can cause offence even when there is no malicious intent. The impact of behaviour on a person affected by it is more relevant than the motive behind it. It is relevant to ask the question: Would a reasonable person think that the behaviour amounted to bullying or harassment? In most cases people know, or should know, that remarks or actions are causing offence, and that causing such offence is unacceptable.

One trivial incident will not constitute bullying or harassment. However, a series of such incidents might do so, particularly where someone has expressed a dislike of such behaviour or has asked for it to stop. Threatened violence, threats relating to assessment issues, promises of special treatment in return for sexual favours, are examples where one incident would be sufficient.

Examples of unacceptable behaviour

Unacceptable behaviour can manifest itself physically or in conversation, written communications, telephone calls, emails, and electronic conference contributions. The following list provides a range of examples but is not exhaustive:

- Unnecessary and unwanted physical contact.
- Excessive and unwanted contact of any kind.
- Shouting or sarcasm.
- Personal insults or name-calling.
- Public humiliation, derogatory or belittling remarks concerning performance, opinions, or beliefs.
- Constant non-constructive criticism.
- Setting up for failure by imposing impossible workloads or deadlines.
- Sexual innuendo.
- Unwelcome advances, attention, invitations, or propositions.
- Staring or leering.
- Suggestive and unwelcome comments or attitudes, insulting behaviour or obscene or offensive gestures.
- Coercion, including promises of rewards in exchange for sexual or other favours.

- Unwelcome comments on the effects of a disability on someone’s personal life.
- Offensive or derogatory comments relating to someone’s gender, sexual orientation, colour, ethnic or national origin, age, socio-economic background, disability, religious or political beliefs, family circumstances or appearance.
- Intrusion by pestering, spying, following, stalking etc.
- Persistently ignoring, patronising, or excluding.
- Displaying, transmitting, or offering access to degrading, indecent, pornographic or racist material including posters, graffiti, websites and emblems.

Rights and responsibilities

All PhD students have the right to carry out their study and to learn in an environment that is free from bullying and harassment. The SZN is committed to providing a working environment in which all students and staff are given the dignity and respect to which they are entitled. The SZN has a responsibility to ensure that its activities are free from discrimination and do not endanger the health and safety of its students or its staff.

Everyone has a responsibility to respect the feelings and sensibilities of others in the working environment, and to behave in a way that does not cause offence. In some instances, individuals may be genuinely unaware that their behaviour is causing offence, but it is the duty of everyone to be sensitive to the impact their conduct may have on others.

Students

Students have a responsibility to comply with this policy and to ensure that their behaviour towards other students and staff does not cause offence and could not in any way be considered as bullying or harassment.

Differences in culture, religious and political beliefs, attitudes and experience, or the misinterpretation of social signals, mean that what is perceived by the person experiencing the behaviour as bullying and harassment, may not be perceived in the same way by others. It is important to be sensitive to the feelings and reactions of others and adjust behaviour as necessary.

Students should discourage bullying and harassment by making it clear that they find such behaviour unacceptable and by supporting other students who experience such treatment.

Staff

Tutors and supervisors have a responsibility to comment critically but constructively on students’ work and to challenge them academically. This is very different from bullying or harassment. However, it is important that consideration is given to style of dealing with others – tutors and supervisors should not behave in a way that would generally be considered offensive or unreasonable.

All members of staff are expected to:

- Set a good example by treating students and other members of staff with dignity and respect.
- Explain and promote awareness of the SZN’s policy on bullying and harassment to students.
- Understand and implement this policy and make every effort to ensure that harassment and bullying do not occur.
- Respond speedily, sensitively, and supportively to any student who makes an allegation of harassment.
- Attempt to resolve any incidents of bullying or harassment of which they are aware.

- Provide clear advice on the procedure and timescales to be adopted.
- Maintain confidentiality in accordance with this policy.
- Make sure there is no further problem of bullying, harassment, or victimisation because of a complaint having been made.
- Report incidents of alleged bullying and harassment to the appropriate authority.

If staff are aware of behaviour of other staff or students that might cause offence, they should not wait for a complaint to be made.

PROCEDURES

Introduction

Any student who experiences bullying or harassment will have the full support of the SZN PhD Steering Committee, and the commitment that all actions necessary to put an immediate stop to it will be taken. These procedures provide a framework for dealing with allegations of incorrect behaviour which can be classified under bullying and/or harassment definitions. Their main aim is to provide guidelines on how to solve the problem quickly and informally whenever possible.

Timescales

Anyone who experiences, or witnesses, bullying or harassment should not wait until the situation reaches an intolerable level. It is easier to put a stop to unwanted behaviour as soon as it occurs. While there is no absolute time limit, if you wish to raise or report an incident, either informally or formally, it is advisable to do so as soon as possible after it has happened, because memories may fade.

It is in everyone's interests that all complaints are dealt with as quickly as possible. A timescale for dealing with each complaint will be agreed and the parties involved will be kept fully informed about its progress.

Confidentiality

As a general principle, the SZN is committed to maintain confidentiality. Information will only be given to those who strictly need to know. If the complainant wishes to remain anonymous it is unlikely that it will be possible to take any action, although the SZN will seek to support all individuals in the resolution of genuine complaints and concerns. It may be possible to address such complaints through indirect methods (e.g., training initiatives, awareness raising, publicising the Bullying and Harassment Policy). There is a need to balance individual confidentiality with the nature of the risk. The decision as to whether a complaint should be progressed will usually rest with the complainant, but if there are unacceptable risks to health, safety, or property it will be necessary to act under this procedure whether or not the complainant agrees. If such action is necessary, the complainant will be notified.

Group complaints

If several people are experiencing bullying or harassment from the same source, and complain as a group, individual statements should be made. If a complaint is made against several people, individual responses to the complaint will be needed.

HOW TO PROCEED:

There are various ways in which individuals can deal with bullying or harassment. The approach taken

can be either informal or formal, but it is mandatory for staff and students to behave in a manner aimed at putting an immediate stop to objectionable behaviour. In many cases this will mean choosing an informal route to begin with.

1) Preliminary attempts to solve the problem

The first step should always be an attempt **to raise and try to resolve the issue informally** with the people concerned. If the student experiences problems with any aspect of the academic or administrative services, he/she should discuss them with the supervision team and/or the third party monitor as soon as possible and, if necessary, initiate the student complaints procedure.

Students are at first encouraged to raise the issue with their Director of Studies and the supervision team (or with the Third-Party Monitor if the complaint relates to the Director of Studies). In many cases it will be possible to resolve the issues amicably at this level. The formal procedures should only be used either when the complaint is so serious that it would be inappropriate to deal with it at an informal level, or when informal action at the departmental level has failed to resolve the issue to the satisfaction of the student.

Students are encouraged to raise issues at an early stage. This is particularly important since delay may create problems in the subsequent investigation of the complaint. Students should note that complaints must be made before the final thesis examination and cannot constitute grounds for appeal against the outcome of the examination.

The complainant should try to keep a record of all incidents in order to be clear about what happened, when, where, and whether anyone else was there. Such records will be particularly useful if it becomes necessary to take more formal action.

The complainant might take any of the following steps:

- Talk to the person who is bullying or harassing him/her, telling him/her about the behaviour that is causing distress, and asking for it to stop. This should be done as soon as possible. In some cases, the person may be unaware that his/her behaviour is inappropriate or objectionable, or that his/her words or actions have been misinterpreted. In such cases, the misunderstanding should be cleared up speedily. Even where the behaviour was intentional, a swift and clear indication that it is objectionable may prove sufficient to stop it.
- Ask another student or a member of staff to go with him/her to speak to the person.
- Write to the person against whom he/she has a complaint, being specific about what was offensive, and asking for the behaviour to stop. It is recommended to keep a copy of the letter in case further action is necessary.
- Ask a member of staff if he or she is prepared to take up the matter on behalf of the complainant.

2) Informal procedure

For students, the first step is to contact the TPM, who will decide whether to inform the PhD Coordinator or deal with the complaint alone. The TPM here has a role of facilitator. In difficult cases, the PhD Coordinator can further support this action. In the experience of similar institutions, most of the complaints are solved at this stage.

The TPM will contact the person against whom the complaint has been made, explaining the nature of the complaint, and who has made it. The person will be given the opportunity to respond (any written

complaint or written response will be made available to both parties). If he/she acknowledges that the behaviour has taken place, the situation will be monitored to ensure no reoccurrence. He/she will also be given a copy of this policy and advised of the procedure that would be followed if a formal complaint were to be made, or if there were to be a reoccurrence of the behaviour.

If, after separate discussions with the parties involved, it is clear that there are differing views and perceptions of the situation, the TPM may arrange to meet both parties together. Whenever this meeting does not lead to clarification or reconciliation, and the matter remains unresolved, the member of staff may consult any witnesses to clarify the situation. When the member of staff decides that there is substance to the complaint, the person who is being complained against will be asked to ensure no future reoccurrence, and the situation will be monitored. Support, guidance and/or counselling will be offered as appropriate.

3) Formal procedure

If a complaint cannot be resolved informally, or if an informal action is considered to be inappropriate (for instance if the behaviour complained about is serious or persistent), the complainant shall present a formal complaint.

Any formal complaint shall be made in writing and addressed to the PhD Coordinator. If the complaint relates to the PhD Coordinator, it shall be addressed to any one member of the PhD Steering Committee. The receiver of the complaint will convene a meeting of the PhD Steering Committee to examine the case and plan for further action.

The PhD Steering Committee will decide how to investigate. Actions may include asking the complainant and anyone stated to have knowledge of the circumstances of the alleged offence, to attend an interview or to submit a signed statement. In the case of sexual harassment any interview will, if possible, be conducted by a senior staff member of the same sex as the complainant, to minimise any feelings of embarrassment. Complainants may ask another student or member of staff in whom they have confidence to accompany them to interviews. Based on the interviews and the statements received, the PhD Steering Committee will decide whether or not further action is necessary.

It is mandatory:

- for the complainant – to take the matter seriously, investigating the allegation thoroughly and, in case, taking swift and effective action to prevent a recurrence.
- for the person against whom the complaint is made – to investigate impartially, to make sure that the person has the opportunity to be represented, and to give a clear account of the allegation so that a case can be stated, and witnesses can be called or cross-examined.

At any time during formal procedures, action to support the complainant’s academic progress may be taken.

The PhD Coordinator shall copy the complaint to: i) the student's Director of Studies, ii) any staff member(s) against whom the complaint is made or who is responsible for taking action to redress it (hereinafter referred to as the member(s) of staff directly involved), iii) the PhD Steering Committee and iv) the Director of the Department in which the student is located. If the complaint relates to the Department Director or other senior staff, it shall be copied to the General Director of the SZN. If the complaint relates to the General Director, it shall be copied to the President.

Any member(s) of staff directly involved shall have the opportunity to respond to the complaint in writing, normally within five working days of receipt of notification.

The PhD Coordinator and the PhD Steering Committee shall take any necessary step, including taking written evidence, to establish and clarify the nature of the complaint, and they may determine:

- that the complaint is inappropriate within the grievance procedure and should be dismissed;
- that the complaint might be resolved amicably, in which case they shall endeavour to do so;
- that the complaint is upheld;

One member of the PhD Steering Committee will be in charge of writing a full and complete report of all actions taken. If the decision is that the complaint should be upheld, the PhD Coordinator shall forward the written report to the President, the General Director, and the Responsible for Disciplinary Actions of the SZN for further actions at the institutional level.

The PhD Coordinator shall make the conclusions known in writing to the student, normally within ten working days of receiving the written complaint. The conclusions shall be copied to the Members of the PhD Steering Committee, the student’s Director of Studies, the President and any member(s) of staff directly involved.

Anonymous complaints will not be accepted, as complaints can only be investigated properly when full and clear background information can be gathered.

Recommendations

Complaints must be set out clearly, stating the problem and including any detail of specific events. Any evidence that may support the complaint must be provided.

If someone complains to you about being bullied or harassed

Someone who is experiencing bullying or harassment and is unable or unwilling to take the appropriate action, may talk to you about it. In these circumstances you should respect the confidence placed in you and give any support you can. You cannot take action on that person’s behalf unless he/she explicitly asks you to do so.

If you witness harassment

You have a right to work and learn in an environment free from bullying and harassment. If you witness bullying or harassment you can complain on your own account. This would also apply to any perceived harassment of a more general nature, such as public disparagement of a group.

Victimisation

Victimisation or retaliation because of actions being taken under this code is unacceptable and may lead to disciplinary action.

Appeals

Any PhD student who considers that he/she has been unfairly treated in terms of this code can write to the PhD Coordinator and request that his/her case be referred to the Responsible for Disciplinary Actions of the SZN and to the SZN President.

POSTGRADUATE RESEARCH STUDENT WELLBEING & MENTAL HEALTH POLICY

Introduction

Postgraduate research students may encounter a diverse range of challenges during their student journey. Some of these challenges may be overcome by talking to family, friends, a supervisor, or a third-party monitor. However, the Stazione Zoologica of Naples Anton Dohrn (SZN) recognises that some students may experience emotional and/or psychological difficulties which have a significant impact on their ability to engage in their research and progress on the student journey. These may be temporary and/or episodic and may require different levels of supports at different points in a student’s progress. The SZN hosts students for doctoral theses in collaboration with several Italian and foreign Universities, and acts as Associated Research Center of the Open University of Milton Keynes, UK. These higher education activities are a priority for the next decade ([SZN Vision 2021 2030.pdf](#)) in order to train a new generation of top scientists who could represent suitable candidates for future positions as researcher or technologist.

In order to deliver its mission and vision, the SZN aims to provide a supportive environment in which student wellbeing is paramount. The SZN is committed to taking reasonable steps to ensure the wellbeing, and promote the good mental health, of its postgraduate research students. However, SZN will not always be able to, and in some cases should not provide such specialised mental health support and wellbeing services that individual students may need to access, as this is the role of professional mental health services, general practitioners or therapists.

This policy outlines how SZN supports the postgraduate research student community, working to promote wellbeing and good mental health.

For specific guidance on how this policy may relate to your personal circumstances, please contact the PhD Program Coordinator via phdszn@szn.it.

Who and which circumstances this policy covers

This policy outlines how SZN supports the postgraduate research student community, working to promote wellbeing and good mental health.

Who and which circumstances this policy does not cover

This policy does not cover students who are not postgraduate research students.

Purpose

The objectives of this policy are:

- Promote an SZN community that is committed to supporting postgraduate research student wellbeing and positive mental health.

- Promote a culture of healthy behaviours that support wellbeing and positive mental health within the postgraduate research student community.
- Raise awareness of mental health issues (e.g. anxiety, depression, severe mental illness) and their causes (e.g. stress, workload, loneliness or pre-existing mental health conditions) in order to promote discussion, reducing stigma and encouraging students in difficulty to seek the appropriate health support.
- Work collaboratively across the different SZN departments to ensure the early identification of any students at risk and proactively work to provide signposts to the necessary support.
- Ensure effective signposting and easy access to resources and services that meet the needs of its diverse postgraduate research students.
- Provide training and support for student-facing staff which enables them to help those students in need to access advice and guidance.

Roles

Support for students with mental health issues can currently be found at the following:

- Upon registration, students are assigned a supervisory team, and within one month of registration they are assigned an independent third-party monitor with whom they can raise issues and seek advice in confidence³.
- Alternatively, the student may wish to address concerns to the Department Director or the PhD Program Coordinator.

The staff in these student-facing roles is required to attend the specific training offered by the Open University, in order to acquire an awareness of the indicators of mental health difficulties. Staff should be able to respond in a timely and appropriate manner to a student’s declaration of any mental health concerns and direct them to appropriate support.

Admissions

SZN recognises that research degree programmes are challenging and that it is imperative that students maintain a healthy work-life balance. Students are therefore admitted on the expectation that their research project can be completed within the designated time frames.

Disclosure

SZN recognises that poor mental health conditions have been stigmatised and that although a significant amount of work has been done to raise awareness and promote discussion, it remains a difficult subject for some people to address. Anxiety about the response to a declaration of mental health difficulties, concerns about lack of confidentiality, and the potential for impact on their academic standing make some students reluctant to admit that they have a problem.

SZN encourages students to declare any difficulties at an early stage in order to provide the necessary help and support in a timely manner and minimize any negative impact on academic progression.

³ A third party monitor who has genuine concerns regarding the health and welfare of a student or other parties may in confidence raise the issues discussed with the SZN PhD Program Coordinator.

Although the student retains the right not to declare a mental health issue this will impact SZN’s ability to support the student.

Study breaks and phased return to study

According to the Open University rules, PGR students who experience mental health issues, can seek to take study breaks in periods of one or more months. A full-time student may apply for a study break for up to a maximum of 12 months and a part-time student may apply for a study break for up to a maximum of 24 months.

Absence from the PhD program for a period exceeding 30 days can be only accepted in case of relevant and compelling reasons. In this case, students must request the suspension from the Program with a written communication sent to the PhD Coordinator, indicating the grounds of the request. This implies the suspension of the fellowship stipend for the same period and all actions indicated in the following paragraph. These requests of suspension are subject to the prior approval by the OU.

The Director of Studies of any student who has suspended the course, at the end of the three years will evaluate if the student has recovered the suspended time, or has to defer the final examination. In the latter case, he/she will send a reasoned request to the PhD Coordinator for the final approval of the deferment. The postponement following the suspension for the reasons above is covered by the fellowship stipend for a maximum period corresponding to the suspension time. SZN will not bear the costs of the registration fees during the deferral period.

Whereas a student has episodic mental health issues that incapacitate them for short periods of time, this should be discussed with the supervisors and an action plan put in place to mitigate the long-term impact on progress and the ability to meet deadlines. In such cases the Open University may allow the student/supervisors to record the days on which they were unable to work (max 30 days) and adjust the maximum registration date accordingly.

Study breaks do not count towards the maximum period of study.

Studying at a distance

Where a PGR student is studying away for SZN for the purposes of fieldwork, research or conferences, it is the responsibility of the Director of Studies to ensure that the risk to those students with mental health issues are identified and actions are identified and taken to mitigate any effects (e.g. frequency of contact, shared contact details).

Support for students in crisis

Where a member of staff is concerned that a student’s mental health capacity is impaired, they should involve the Director of Studies and the PhD Program Coordinator.

Health, Wellbeing and Fitness to Study

Unless the student is incapacitated it is unlikely that they will not be able to make decisions about their study and it is important not to conflate mental illness with fitness to study.

The guidelines are intended to provide a framework for the positive management of students. However, where behaviour as a result of ill health or disability poses a risk of harm to either the student

themselves or others, or where students do not positively respond to more supportive interventions it may be necessary to invoke Disciplinary Procedures.

Confidentiality

The SZN respects the confidentiality of its students’ health and welfare, according to SZN [Privacy Policy](#). A student may feel that disclosing personal or “special category”⁴ data, such as information about physical or mental health, will help them to access the support that they require.

Students will disclose disability information to competent physician upon the mandatory medical examination. The information will be entered into the student record and treated in compliance with EU Regulations n. 679/2016 and n.101/2018.

In case students deem it necessary to ask for support, they should inform the PhD Program Coordinator. Under normal circumstances, student data will not be shared with third parties outside SZN. If the data does need to be shared, SZN will seek the consent of the student.

Further clarification

If you have any queries around the content provided within this document and how to interpret it, please contact the PhD Program Coordinator via phdszn@szn.it.

If you have any comments about this policy document and how it might be improved, please submit these to phdszn@szn.it.

⁴ “Special categories” data comprise racial or ethnic origin, religious beliefs, political opinions, trade union membership, genetics, biometrics (where used for ID purposes) physical or mental health, sex life and sexual orientation.

THIRD-PARTY MONITORING GUIDELINES

What is Third-Party Monitoring?

Third-party monitoring is a system of support for SZN research students that is in place to:

- a) Provide pastoral support for students outside of the supervisory environment
- b) Identify and resolve potential problems, thus avoiding impeded progress
- c) Provide a dispassionate view if difficulties arise with a student’s progress
- d) Identify resource management problems (staff time, equipment etc).

It allows students to discuss their studies with a third party, who is not one of their supervisors or their head of discipline. The third-party monitoring system allows students to discuss and seek advice about:

- a) Pastoral matters
- b) Areas of potential student/supervisor conflict
- c) Research process problems.

Third-party monitoring timetable

Each student may choose (not mandatory for students at universities other than The Open University) a third-party monitor as early as possible in the student’s registration. Within the first month of registration, every student receives a list of potential third party monitors, among which he/she is invited to choose one.

New students should have had their first third party monitoring session by the fifth month of their registration.

Third party monitoring sessions should then take place annually in the first quarter of the calendar year (January - March) for all research students.

The third-party monitor should be available for consultation by the student on an ongoing basis throughout the year. Where possible the same third-party monitor should be retained throughout the student’s research degree studies.

Third party monitoring minimum requirements

- a) Third party monitors must be members of SZN staff and have PhD supervision experience (experience with UK PhD student supervision is required by the OU).
- b) Third party monitors should not normally be member of the SZN PhD Steering Committee.
- c) Third party monitors must act in the best interests of the student, irrespective of any professional or social relationship with either the student or the supervisors.
- d) Third party monitoring meeting must be offered to all new students by the fifth month of their registration and then annually in the first quarter of the calendar year (January - March).

- e) Third party monitors should be available for consultation by the student throughout the year.
- f) For full-time students, third party monitoring must involve a face-to-face meeting. Face to face meetings should be in person; however, where this is impracticable other arrangements for synchronous meetings may be used such as video conference, Skype or telephone.
- g) Both the third-party monitor and the student should have the right to request a changed allocation.
- h) Third party monitoring should allow students to discuss issues in confidence, unless it is agreed that further action is needed, or it is of a serious nature e.g. bullying and harassment.
- i) The TPM informs the PhD Program Coordinator that the annual meeting took place. Any records on file must be kept confidential and in a secure location.
- j) Third party monitors should be responsible for monitoring any follow-up or should involve the PhD Program Coordinator if difficulties arise that cannot easily be resolved.
- k) Notwithstanding of (a) to (j) a third-party monitor who has genuine concerns regarding the health and welfare of a student or other parties may in confidence raise the issues discussed with the PhD Program Coordinator.

Third party monitor person specification

- PhD supervision experience (UK PhD supervision experience is required by the OU).
- A commitment to the best interests of the student.
- An understanding of, and commitment to, professional independence from the supervisors.
- Effective listening, communication and interpersonal skills.
- An appreciation and understanding of confidentiality issues.
- Effective meeting skills.
- An understanding of and respect for diversity.
- Effective problem solving and negotiating skills.
- An awareness of institutional policy and procedures relating to research students, and knowledge of where to refer issues

Third party monitoring good practice

Person Specification	Examples of Good Practice	Actions to be Avoided
<p>Understanding of, and commitment to, the best interests of the student understanding of, and commitment to, professional independence from the supervisors</p>	<ul style="list-style-type: none"> • third party monitoring where there is no close personal relationship with student or supervisors • meeting with the student without the supervisors being present • meeting the student on neutral ground • declaring any potential conflict of interest • agreeing on the format and content of any feedback to the supervisors or PhD Program Coordinator from the monitoring process • sticking to the plans of action agreed between student and third-party monitor • using formal channels of communication formally recording agreed actions 	<ul style="list-style-type: none"> • communicating about the student to the supervisors or PhD Program Coordinator without student agreement. • assuming a prejudicial position with student or supervisors • defending bad practice breaking confidences
<p>Effective listening, communication and interpersonal skills</p>	<ul style="list-style-type: none"> • taking account of the fact that the student’s first language may not be English • asking open questions • allowing the student to finish what they were saying • listening and repeating your understanding of what has taken place during the meeting to check that both parties agree • keeping a formal record of the meeting • inviting fuller questions • asking relevant, reflective questions • summarizing or seeking clarification 	<ul style="list-style-type: none"> • focusing entirely on the student’s academic progress • giving the impression that the meeting is not a high priority • being too prescriptive too early in the meeting
<p>Appreciation and understanding of confidentiality issues</p>	<ul style="list-style-type: none"> • explaining the role of the monitor at the first meeting • agreeing ground rules (e.g. no disclosure unless agreed) 	<ul style="list-style-type: none"> • breaking confidences • exposing specific problems with other students and/or supervisors

	<ul style="list-style-type: none"> • reassuring the student that information will not be shared without permission • storing records in a secure place 	<ul style="list-style-type: none"> • discussing any aspect of the meeting outside the meeting
Effective meeting skills	<ul style="list-style-type: none"> • agreeing times in advance • being on time • switching off email/divert phone calls • ensuring student knows the purpose of the meeting • agreeing agenda in advance • stopping when it is clear that the business is finished • keeping brief notes • having a pre meeting check list of issues to discuss with the student • agreeing a suitable neutral venue with the student • agreeing the content of any notes written up at end of meeting • giving the student an opportunity to write up notes • face to face, not phone or email, if possible 	<ul style="list-style-type: none"> • cancelling at the last minute • trying to schedule meeting at late notice • allowing insufficient time • inappropriate, noisy, distracting location • being late
Understanding of and respect for diversity	<ul style="list-style-type: none"> • relating to the student as a person, not a member of a particular group • soliciting the student’s perspective • being open and flexible • being aware of your own assumptions • checking with student (eg time, venue, etc) before making arrangements for meeting 	<ul style="list-style-type: none"> • assuming certain beliefs or views • arranging meetings at times/places that are inappropriate
Effective problem solving and negotiation skills	<ul style="list-style-type: none"> • ‘sleeping on it’ • discussing a range of possible solutions • advising when necessary • talking to all parties concerned • getting advice 	<ul style="list-style-type: none"> • assuming you know the answer already • being prescriptive avoiding possible solutions because they are ‘politically’ difficult

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	<ul style="list-style-type: none"> • asking probing questions • being a good listener • clarifying issues for and with each stakeholder 	
<p>Awareness of institutional policy and procedures relating to research students, and knowledge of where to refer issues</p>	<ul style="list-style-type: none"> • knowing where to get help • understanding of institutional research degree policy and procedures • making suggestions to student about where s/he can get info/help • saying ‘I don’t know’ if that’s the case. 	<ul style="list-style-type: none"> • dismissing any OU (if the case) and/or SZN policy as irrelevant • being self-congratulatory • vague, unfocused advice • ignoring communications

GUIDELINES FOR PH.D. STUDENTS’ TRAVEL

(These guidelines only apply to students whose fellowship is financially managed by Stazione Zoologica)

As indicated in the Stazione Zoologica-Open University Ph.D. Program Regulations, the Stazione Zoologica (SZN) assigns a budget to support Ph.D. students’ participation to external training events (missions). These events are mainly courses, conferences, workshops or any other activity on topics related to their research project, organized outside the SZN premises.

Provided that funds are available, €1.500,00 per student are allocated for the above missions. These are charged to the SZN Ordinary Fund.

PhD students whose fellowships are supported by external funds are excluded from the scheme. These students are allowed to attend such events, but their participation must be supported by external funds as well.

Their participation to the events must be notified to the Higher Education Office in written by the Director of Studies.

Missions are ruled by the regulation “[Regolamento Missioni](#)” (Approved with Board Resolution n. 54 of 20/04/2021 - *English version available in the Ph.D. Students Dropbox*). However, the application submission follows an ad hoc procedure as indicated in the following paragraph.

Submission of mission application

The travel funds application shall be submitted by the student to the Higher Education Office (phdszn@szn.it) at least 30 days before the event and shall contain the following documents:

- a) Request letter from the student containing the motivations for the participation to the event and its training content, also signed for approval by the Director of Studies;
- b) Any supporting document about the event indicating its content (announcement, program, invitation, etc.);
- c) Form “*Modulo d’Autorizzazione Missione*” available on the SZN intranet web site, duly and fully completed and digitally signed;
- d) Cost estimates;
- e) Eventual abstract presented and/or accepted;
- f) Any document supporting the evidence that the student has advanced request of additional support to the event’s organization or to any other external entity.

In order to be reimbursed, at the end of the mission, students have to submit the claim for expenses to the administration office according to the procedure indicated in the “*Regolamento Missioni*” of the SZN.

In addition, students must send to the Higher Education Office by email (phdszn@szn.it), a copy of the reimbursement forms (“*Modulo Liquidazione Missione*” and “*Rendiconto Missione*”) and a copy of the certificate of attendance to the event.

It is allowed to fund the participation to more than one training event per student, provided that the maximum limit of €1.500,00 per student is not exceeded.

Also, students that carry out missions not charged on the fund indicated in the first paragraph (i.e.: external funds, mission free of charge, etc.) must send to the Higher Education Office (phdszn@szn.it) a copy of the form “*Modulo d’Autorizzazione Missione*” submitted to the Administration, and a certificate of attendance to the event.