



UCL Research Integrity Annual Statement 2014-2015

Background

In 2012 Universities UK published the *Concordat to support research integrity* ('the *Concordat*' hereafter) which is a national framework for helping to ensure good practice and integrity. The concordat was written in collaboration with government departments and various funding and research councils, such as the Wellcome Trust, HEFCE and Research Councils UK. It applies to all disciplines and areas of research and was written to complement existing frameworks relating to good research practice.

As one of the signatories, HEFCE has also made compliance with the *Concordat* a condition of funding and incorporated it into funding agreements.

Following publication, the UCL Research Governance Committee and Senior Management Team approved UCL's adoption of the *Concordat* and therefore the following five commitments contained within:

1. Maintaining the highest standards of rigour and integrity in all aspects of research;
2. Ensuring that research is conducted according to appropriate ethical, legal and professional frameworks, obligations and standards;
3. Supporting a research environment that is underpinned by a culture of integrity and based on good governance, best practice and support for the development of researchers;
4. Using transparent, robust and fair processes to deal with allegations of research misconduct should they arise;
5. Working together to strengthen the integrity of research and to reviewing processes regularly and openly.

As part of the fifth commitment, it is recommended that employers of researchers be explicit about what steps they have taken to strengthen a culture of integrity within their institution. This declaration should be made in a publicly available annual statement to the institution's governing body.

It is recommended that the annual statement includes:

- a summary of actions and activities that have been undertaken to support and strengthen understanding and application of research integrity issues (for example postgraduate and researcher training, or process reviews);
- assurances that the processes in place for dealing with allegations of misconduct are transparent, robust and fair, and continue to be appropriate to the needs of the organisation;
- a high-level statement on any formal investigations of research misconduct undertaken during the reporting period.

As part of UCL's commitment to supporting a culture of research integrity, this report represents UCL's annual statement on research integrity activities for the period 1 October 2014 – 30 September 2015.

Introduction

In response to the publication of the *Concordat*¹ the UCL Research Governance Committee set up a Working Group which suggested a number of short- and long-term activities to increase awareness of research integrity issues as well as demonstrating UCL's compliance with the *Concordat*. The focus was aimed towards the promotion of a 'value-based culture' in which compliance with standards and good research practice, as well as open discussion on integrity issues, was common place and an accepted part of normal research practices.

Research integrity is not a standalone issue but one that encompasses many other areas such as publication and authorship, research data management, information security and funding ethics. Therefore to further establish a culture of research integrity, it is imperative that these areas be considered together by establishing the connection between research activities and development in the mind-set of those involved in research at UCL.

An important factor in delivering the suggested activities was that there needed to be a clear and sustained focus on research integrity across UCL. A single post was therefore created to take responsibility for developing research integrity awareness activities as well as developing and delivering a wider programme of activities as approved by the Research Governance Committee. To this end, a Cultures of Integrity Coordinator was appointed and took up duties at the start of January 2015.

Setting the standards

In May 2015, the UCL Statement on Research Integrity was published which sets out clearly UCL's commitment to ensuring the highest standards of integrity in all aspects of its research activities. It also reiterates UCL's commitment to supporting and enabling its staff and students in maintaining these standards. The four elements of integrity as set out in the *Concordat* (honesty, rigour, transparency and openness of communication, and care and respect) have been adopted as Principles of Integrity. All those involved with research at UCL (staff, students, visitors and research collaborators) are expected to be aware of and abide by these standards.

A copy of the statement is available on the research integrity website.²

Communicating standards

The *Concordat* states clearly the need to comply with accepted good practice as well as 'appropriate ethical, legal and professional frameworks, obligations and standards'. UCL already had for several years clear policies in place, such as at the Code of Conduct for Research, Research Data Policy and Declaration of Interest Policy.

However, information on such policies and related research integrity matters in general was highly dispersed across a number of departmental areas. In order to better enable and support high standards of good practice, it was important to bring together all resources for research integrity information into one area. This central repository would better enable researchers to easily access the information as well as helping to highlight the close affiliation of these areas to each other.

In September 2015, UCL's Research Integrity Website was launched (www.ucl.ac.uk/research/integrity). Highlighting all areas of research integrity at UCL, the website does not attempt to repeat existing information but rather sign-posts and explains the rationale behind it; highlighting the most important information and directing the reader to the relevant page on the UCL website. It also provides additional guidance, for example information on collaborative working and research outside the UK and new guidelines for external researchers who wish to recruit UCL staff or students as research participants.

¹ <http://www.universitiesuk.ac.uk/highereducation/Pages/Theconcordattosupportresearchintegrity.aspx>

² <http://www.ucl.ac.uk/research/integrity/integrity-at-ucl>

The website acts as a living framework for research integrity. It is divided into five sections: integrity at UCL; ethics; policy and guidelines; research funding ethics; and training.

1. UCL Statement on Research Integrity

This section contains the aforementioned UCL Statement on Research Integrity and the annual reporting on research integrity activities across UCL. There are links to the Code of Conduct for Research, UCL's procedure for investigating and resolving allegations of misconduct in academic research as well as other useful links such as the Montreal Statement (2011) on research integrity in cross-boundary research collaborations.

2. Ethics

The ethics section contains information on ethics across various research areas within UCL; research with human participants; animal research; museums and collections; advice for researchers conducting research outside the UK. A new policy for external researchers who wish to recruit UCL staff and/or students as research participants was created to provide assurance that such research is of the same standards expected of those at UCL.

3. Policy and guidelines

The policy and guidelines section draws together a variety of policy and guidance with regard to the entire research cycle including declaration of interest, publication and authorship, lone and off-site working, research misconduct and research collaboration. There is also an extensive data management and protection section covering research data management, data protection, freedom of information, intellectual property, information security and open access. Further guidance will be developed and added over the coming year, such as new guidance on responsible innovation.

4. Training

The training section holds information on training options available within UCL regarding research integrity and related areas as well as referring the reader to other external options. There is also advice and guidance on how to develop local research integrity sessions, such as departmental seminars. This section will continue to develop as further training opportunities and resources are created. Further information on research integrity training is referenced in a later section.

5. Research Funding Ethics

UCL is committed to ensuring the highest standards of research integrity across all its activities and part of this includes the careful consideration of research funding opportunities available for staff and students. UCL's position on certain funding opportunities, such as from the tobacco industry is clear. There are, however, other particular funding opportunities that may not be acceptable to accept, either for individual projects or in general. Such opportunities could conflict with or be inconsistent with UCL's aims, objective or activities and so the Research Funding Ethics Policy was developed to provide guidance.

Following this, the UCL Ethics Committee and Research Governance Committee established the Research Funding Ethics Committee to oversee the Research Funding Ethics Policy and to review the appropriateness of funding cases referred to it.

A copy of the policy is available on the research integrity website.³

³ <http://www.ucl.ac.uk/research/integrity/research-funding-ethics-committee>

Reviewing and streamlining processes to support a culture of research integrity

In 2014, a Working Group was set up to review the operation of the UCL Research Ethics Committee (UCL REC), routes for ethical approval of non-NHS research and current processes across UCL relating to research ethics. The aim of the Working Group was to make recommendations for improvements to a system which had not been reviewed for several years and in light of a number of identified issues and challenges. Following the merger with the UCL Institute of Education (IOE) in December 2014, another main driver was to harmonise the two institutions' pre-existing ethical review systems.

The Working Group consisted of members from across the institution, including members from the UCL REC, IOE REC as well as local faculty ethics committees, with the final report being presented to, and accepted by, the Research Governance Committee in June 2015. The main recommendation was the adoption of a formally devolved review structure, with authority being delegated to each faculty from the central UCL REC. The recommended system would be based on proportionate review with a risk checklist developed to enable researchers to ascertain the ethical risk of their project and therefore the level of review.

Taking into consideration the differences between the pre-existing UCL and IOE systems, a new Research Ethics Policy was developed along with standard ethics applications forms and guidelines to be used across UCL, as well as harmonised appeals and complaints processes.

The proposed new review structure and process should enable a unified approach to research ethics and ethical review, streamlining processes, and improving usability and accessibility through the new forms and guidelines. This should therefore benefit UCL researchers and reviewers alike. It allows for a more flexible approach through the delegation to faculties which would be able to create systems more suited to their needs but still within a unified framework.

The proposed system is due to be piloted and a report will be submitted to the Research Governance Committee during 2016.

Awareness Raising Activities

In a successful culture of research integrity, researchers at all levels should not only be able to recognise when behaviour falls below accepted standards, they should also feel able to raise and discuss these issues as and when they arise. Conversations regarding good practice and standards should be commonplace amongst all those involved with research at UCL.

Therefore an important aspect of building and supporting a culture of research integrity is awareness raising through discussions and open communication. UCL is of the firm view that creating an ingrained, widespread culture takes time and has therefore taken a long-term approach to its awareness raising plans.

Current Activities

A review of training opportunities showed that there were already a number of courses and training opportunities available throughout UCL in relation to research integrity, such as courses/workshop on areas relating to publication and authorship run by the Doctoral School and Organisational Development.

The Joint Research Office developed a template for a half-day introductory seminar on research integrity for the School of Life and Medical Sciences (SLMS) which has been very successfully delivered on a number of occasions and is a model which is also available for use outside of SLMS.

In February 2015 the Centre for Advanced Learning and Teaching (CALT) arranged an introductory workshop with a representative from the Erasmus University Rotterdam which centred on the Dilemma Game, a training device created by Erasmus University. Representatives from CALT, in addition to those working within research ethics, integrity, the

Doctoral School and Organisational Development attended to review the benefits of the Dilemma Game.

CALT have since run several sessions for UCL students using the Dilemma Game which have received very positive feedback from attendees. An abbreviated version was used as the basis of two sessions at this year's Research Staff Conference and the full version is recommended for local seminars on the training section of the research integrity website.

Future training and development

As part of the long-term view taken by UCL, a Research Integrity Training Strategy was developed during 2014-15. The strategy sets out the vision and aims in relation to research integrity development across UCL and seeks to develop a cohesive programme of training and learning opportunities that take into account differences in disciplines as well as learning needs and styles.

The programme of training opportunities has not been designed to be prescriptive as to the nature, style and number of opportunities, but instead seeks to work with key stakeholders within UCL to provide a joined-up and cohesive model of opportunities that promote, *inter alia*, individual responsibility, cross-disciplinary collaboration and best practice.

There are already examples of good practice within UCL; the strategy seeks to build on current opportunities and to work with such stakeholders to increase and improve on the types and number of opportunities available for both staff and students with UCL.

To this end, a Steering Group has been established that will include key stakeholders in the development of the overall UCL research integrity development agenda. The strategy is long-term and so includes inductions for new staff, development for students from undergraduate to post-graduate and new postgraduate supervisors as well as experienced members of staff. The target audience will include professional services and support staff as well as academics.

Internal communications

As part of the launch of the research integrity website a communications plan has been developed to coordinate communications regarding research integrity across UCL. Reference to the research integrity website and links to it have been connected across the UCL website and will continue to be developed, with further communication aimed at local level distribution.

The communications plan is linked to other awareness raising activities such as local integrity seminars and is part of the overall research integrity agenda. Networks across UCL will be used to raise awareness of the website and research integrity in general, particularly to ensure leadership buy-in and ownership. As the website was launched in September 2015, the main activities are due to commence at the start of the new academic year and so will be reported in detail in next year's annual statement.

Research Misconduct

The UCL procedure for investigating and resolving allegations of misconduct in academic research closely follows the UK Research Integrity Office's model whilst allowing some minor variations to fit with local circumstances and usage of terminology. Over the past year a review of the procedure has been underway, with the aim of ensuring a proportionate response to allegations and to enable greater expediency in considering allegations.

The review primarily relates to the first two parts of the procedure; the initial assessment and the screening stages. Currently, allegations that proceed to the screening stage are reviewed by a bespoke panel created specifically to review the allegation. Many factors impact upon the time taken to bring the panel together and to complete the screening stage. The current procedure also invites such panels to investigate the allegation and this causes confusion with the formal investigation stage of the process. Therefore, the review is focused on seeking ways to clarify the role of the screening panel and to reduce the time taken to complete this stage of the

process and consequently reduce the effect on all parties concerned. At the date of this report the review is in the final stages of completion and training for panelists is being planned; the revised procedure is expected to come into force on 1 February 2016.

Summary of investigations

No formal investigations were undertaken during the academic year 2013-14 and no cases of academic misconduct proved. For the academic year 2014-15 one formal investigation was completed and the allegation of piracy (defined as the deliberate exploitation of ideas from others without proper acknowledgement) was partly upheld. Retractions were also recommended as the result of one other allegation.