UNIVERSITY OF LEICESTER

RESEARCH POLICY COMMITTEE AND COUNCIL

19 March 2015

Final report of the Research Integrity Working Group (RIWG)

Purpose of attached report:

1. Presents the outcomes of the work of RIWG;
2. Forms a basis for the 2015 annual research integrity report to Council, as required by RCUK;
3. Provides a draft for the University response to the RCUK Questionnaire;
4. Makes recommendations for future actions to ensure research integrity becomes embedded in the work of all those undertaking or administering research at the University, so that the University can meet its regulatory commitments.

Decisions or actions required of the committee:

The Committee is asked to note the work of the RIWG, the conclusions made in the report and to consider which of the recommendations to support.

Timing implications:

The recommendations made in this report will take a significant period to scope out and implement. If the University is to be able to report to RCUK in 2016 that it has made progress in the areas it identified in 2015 as requiring attention, then a decision to proceed along the lines proposed needs to be made urgently.

Authors:

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With contributions from all RIWG members.

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Date of report: 12 March 2015
Final report of the Research Integrity Working Group (RIWG)

1. Purpose of this report

This report outlines for Research Policy Committee and Council the requirements placed on the University under the Concordat to Support Research Integrity (*the Concordat*) and the Research Councils UK Research Integrity Assurance questionnaire (*RCUK Questionnaire*). It also

5. presents the outcomes of the work of RIWG;
6. forms a basis for the 2015 annual research integrity report to Council, as required by RCUK;
7. provides a draft for the University response to the RCUK Questionnaire;
8. makes recommendations for future actions to ensure research integrity becomes embedded in the work of all those undertaking or administering research at the University, so that the University can meet its regulatory commitments.

The Concordat recommends that the University should present a short annual statement to its governing body (i.e. Council) that includes a summary of actions and activities that have been undertaken to support and strengthen understanding and application of research integrity issues. This report forms the 2015 annual statement.

2. Background

The Research Integrity Working Group (membership in Appendix 1) was set up by Research Policy Committee in February 2014 as a task and finish group. It has:

- examined current processes, guidelines and training in relation, primarily, to commitments 3 and 5 in the Concordat (see below);
- reviewed the University’s responses to the six questions in the RCUK Questionnaire;
- carried out actions to enhance the understanding of research integrity by all researchers;
- made recommendations to the University for future actions around research integrity.

RIWG has now disbanded.

**Concordat to Support Research Integrity**

The Concordat was launched in 2012 with support from the Government, HEFCE and major research funders such as RCUK and the Wellcome Trust. The University has publically stated its support for the Concordat.

The key provisions of the Concordat are enshrined in five commitments:

1. We are committed to maintaining the highest standards of rigour and integrity in all aspects of research.
2. We are committed to ensuring that research is conducted according to appropriate ethical, legal and professional frameworks, obligations and standards.
3. We are committed to 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. We are committed to using transparent, robust and fair processes to deal with allegations of research misconduct should they arise.

5. We are committed to working together to strengthen the integrity of research and to reviewing progress regularly and openly.

Research Councils UK Integrity Assurance

Research Organisations in receipt of RCUK funding are required to have procedures for governing good research practice, and for investigating and reporting unacceptable research conduct, so as to meet the requirements set out in the Concordat and the RCUK Policy and Guidelines on the Governance of Good Research Conduct.

As part of the RCUK assurance process, universities are expected to provide responses to six questions (see below). RIWG has examined the current University position in relation to these and where possible has ensured that clear and affirmative answers can be provided. It has identified that additional work is required to develop policies and actions in some areas, and has made recommendations for these in Section 4.

The Concordat recommends that the University should present a short annual statement to Council that includes, amongst other things, 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). This, the second and final report of the RIWG, is the 2015 annual statement.

Recommendation 1: That Research Policy Committee and Council approve this report as the University’s 2015 annual report on research integrity.

In line with the Concordat, this report will be made publically available on the University website once approved. This report was reviewed and approved by Research Policy Committee before coming to Council.

3. Key issues

This section outlines:

a. The responses suggested by RIWG to the RCUK Questionnaire. Responsibility for responding to RCUK lies elsewhere but it is hoped that the responses below will provide the basis for the University’s response for 2015.

b. The findings of RIWG and its recommendations for ensuring integrity in research becomes and remains a core value for the University and its staff.

a) RCUK Questionnaire Responses

Question 1: Please confirm that you have policies and procedures in place that meet the RCUK requirements, including processes for dealing with allegations of misconduct. How often are these reviewed and when were they last reviewed?

Response: The University’s Code of Conduct for Research is the key policy which sets out the University’s commitment to integrity in research. It is underpinned by a range of other codes, each of which lay out in more detail the specific responsibilities of researchers in these areas (e.g. ethics codes, intellectual property policy etc.) The Code of Conduct for Research underwent major revision in 2011 and again in 2014. It is intended in the future to carry out light-touch reviews annually, with in-depth revisions where required.

3
The University processes for dealing with research misconduct in staff form part of the Discipline Ordinances which were extensively rewritten in 2011. They are based on the UK Research Integrity Office procedure. The Discipline Ordinances were reviewed by Human Resources in summer 2014, in light of the revisions to the Code of Conduct, and found to still meet internal and external requirements.

The University’s academic regulations for students make provision for the handling of cases of research misconduct. In response to the revised Code, the Postgraduate Research Policy Committee is considering revisions to the academic regulations for research degrees to ensure these are consistent with the Code. The Postgraduate Research Policy Committee is also working with the Leicester Learning Institute (the University’s chief staff development and training vehicle) to ensure that advice on research integrity is embedded in the training provided to research students and supervisors.

**Question 2**: Please provide the publicly accessible weblink to these policies and the name of the senior officer responsible for dealing with cases of misconduct.

**Response**: The Senior Officer responsible is the Pro Vice Chancellor (Research and Enterprise) Professor Kevin Schürer. The weblink to the Research Code of Conduct is [http://www2.le.ac.uk/offices/researchsupport/integrity/code-of-conduct](http://www2.le.ac.uk/offices/researchsupport/integrity/code-of-conduct).

**Question 3**: How are these policies disseminated to staff? Please indicate if any special provision is made for new employees (including post-graduate students) and also how staff awareness is maintained.

**Response**: A range of posters and booklets have been designed, available in both paper and pdf format (via the above website). Posters have been sent to all departments for display on departmental notice boards and, working with departmental administrators, a booklet was given to every member of staff with research responsibilities (academic, research, technical and administrative) in March 2015. Departments have been provided with spare copies to be placed in the induction packs for new staff; additional copies are available from Research Support Office on request.

Copies of the booklet were also given to staff in Corporate Services whose remit includes research, such as Research Support Office, Enterprise and Business Development, the Leicester Learning Institute and the Graduate Office.

This material is also being made available, on an ongoing basis, to staff attending research events and training sessions, such as new staff induction and via the early career researcher network.

Pdf versions of the booklet were emailed to every current research student -masters and doctoral, both campus-based and distance learning - in February 2015. They will also be included in the starter packs emailed to every new research student and handed out at the induction events in January and October each year.

In addition, the booklets and the new Code will be on the agenda at University and College Postgraduate Research Policy Committees in spring 2015 and, through this route, all departmental Directors of Postgraduate Studies will be made aware of the Code and the implications for students.

**Question 4**: Please outline any 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).

**Response**: In February 2014 the University set up a task and finish group – the Research Integrity Working Group – to review processes, action and activities in this area. As part of its work, RIWG
carried out a full review of the Code, seeking input from a wide range of stakeholders, and the revised code was formally approved in autumn 2014. RIWG also developed an extensive new publicly available website (see link in Q2) which greatly improves the usability of and ease of access to the Code. The launch of the revised Code was announced via the University website and the staff weekly email bulletin and discussed at University and College Research Committees.

RIWG designed the booklets and posters mentioned above, and ensured their dissemination to staff and postgraduate students. A short presentation is being written explaining what integrity is, about the Code and how to report possible research misconduct. The members of RIWG will be using this in presentations to College and University Research Committees to raise awareness.

As part of its work, RIWG also carried out a review of current training provision and looked at the possibility of purchasing an online training package from an external provider, as well as use of internal expertise. In its final report before disbanding (spring 2015), RIWG made a number of recommendations to the University concerning provision of training for staff and students, ongoing monitoring, and how to ensure that integrity becomes and remains a core value for all staff. These recommendations are currently being considered by the University.

**Question 5**: How many formal investigations (as defined in RCUK policy) of research misconduct have been completed in the past three completed academic years which relate to researchers funded by or responsible for funding from Research Councils (including supervisors of postgraduate awards)? Please complete the table below.

**Response**: Data supplied by Human resources indicate that no formal investigations have taken place within this time frame (see RCUK required table below).

<table>
<thead>
<tr>
<th></th>
<th>Number of formal investigations completed</th>
<th>Number of allegations upheld (in whole or in part)</th>
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<tbody>
<tr>
<td></td>
<td>Year 1* Year 2 Year 3</td>
<td>Year 1* Year 2 Year 3</td>
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<tr>
<td>Fabrication</td>
<td>0</td>
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<tr>
<td>Falsification</td>
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<td>Plagiarism</td>
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<tr>
<td>Misrepresentation</td>
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<tr>
<td>Breach of duty of care</td>
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<tr>
<td>Improper dealing with allegations of misconduct</td>
<td>0</td>
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<tr>
<td>Other (please specify)</td>
<td>0</td>
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<tr>
<td>Details of any allegations upheld in part</td>
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</tbody>
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**Question 6**: The Research Councils expect that the research they support will be carried out to a high ethical standard. Please explain the arrangements you have in place for reviewing that any research funded by the Research Councils is planned and conducted in accordance with such ethical standards.

**Response**: The University’s commitment to ethical standards begins before the point of application with the provision of appropriate training for staff and students. When making an application for external funding, staff are required to indicate on their internal application approval form whether or not ethical review is required for their project, and whether approval would come from University or NHS ethics committee. Each department has access to at least one nominated ethics officer who is trained and able to advise colleagues on ethical issues and can approve projects of minimal risk. They
are supported by five ethics sub-committees. Ethical review of projects of above minimal risk is conducted by the Sub-Committees; these can sign off anything projects or choose refer them to UREC. For projects falling within the remit of NHS ethics review, the University’s Research Governance Office provides dedicated expertise and has close links to the local NHS trusts and ethics committees. Oversight of University ethical review and ethics policies lies with the University Research Ethics Committee (UREC).

Where a project requires ethical review, on hearing that their funding application is successful, or where no external funding is requested, or in special cases before application, the PI (Principal Investigator) completes an online ethical review form, which is then submitted electronically to the relevant Sub-Committee for review. The Sub-Committee can approve the application or request amendments to, for example, protocols or questionnaires. They can also request mid-point reviews or updates if they feel a project merits additional oversight. PIs are required to return to the Committee for updated approval should there be any significant changes to protocols etc. UREC will be shortly rolling out a new ethics online review system. This is a user friendly, web-based system accessible to all staff and students. In parallel, the University is revising the University Ethics Code of Practice to factor in the consequent changes to the ethics review system and also to update ethical review procedures.

Except in exceptional circumstances, for externally-funded project requiring ethical approval, Research Support Office staff will only allow projects to pass from award to activation stage once the PI has supplied the ethics approval code and the approval date. These are recorded as part of the project details within the finance system.

The University Research Ethics Committee also has procedures and regulations for ethical approval of student research projects and/or coursework, from undergraduate through to and including postgraduate research level.

Recommendation 2: That Research Policy Committee and Council approve these responses as draft responses to the 2015 RCUK Questionnaire.

b) Findings and Recommendations of RIWG

i. Statement of Principles

As stated at the beginning of the Code, the University sees integrity in research as a core value for staff and students. Throughout the work of RIWG, it was clear that most of those covered by the Code lack a clear understanding of what research integrity means and are not familiar with the routes for reporting possible misconduct in research. This does not mean that misconduct in research is common across the University, since the vast majority of staff and students routinely behave with integrity.

RIWG is of the opinion that understanding of research integrity and what constitutes appropriate behaviour needs to be taught to all those who carry out research. For many reasons, the statements of principle in the Code need to be backed up with proactive measures. In the findings and recommendations below, RIWG has borne in mind ways in which these principles could be embedded in practice and makes recommendations to the University on how this might be done.

ii. Training

RIWG carried out a survey of research integrity-related training provision across the University. Although there were examples of good training in relation to some aspects of research integrity, such as plagiarism or ethics, no department or college provided training in
all aspects of research integrity. In addition, not all eligible groups (research students, early career researchers, supervisors and new academic staff etc.) had access to, or were encouraged to undertake, training. Research integrity does not feature in the Postgraduate Certificate in Academic Practice in Higher Education that most new academic staff are required to complete.

RIWG then considered what would be required if basic training in all aspects of research integrity were to be provided to all staff and post-graduate students carrying out research-related activity. This was estimated at 2000 people initially, with smaller numbers of new starters each year, but still numbering several hundred. It is clear that providing direct training for all these groups would require the development of many courses, each to be delivered in workshops to small groups, requiring a large number of trainers with relevant expertise. Workshops would need to be tailored to the needs of different subject areas. To be effective, attendance at all courses and completion of the full range of relevant workshops would need to be monitored. The cost and effort required to do this was perceived to be prohibitive.

RIWG then considered other ways in which basic training in all aspects of research integrity might be provided to relevant groups. Online training was considered an attractive option as large numbers of people could receive training without massive input from training providers. Providing modules via Blackboard, the University’s virtual learning environment which is already used by all staff as well as campus-based and distance learning students, was seen to be an attractive outcome.

Previously, a short online training module on data security was developed by a small group of Universities (including Leicester) and is now available via Blackboard. It may be possible to develop research integrity modules in the same way and efforts were made to investigate the possibility and cost of this (see below).

RIWG members obtained trial access to a suite of research integrity training modules developed and provided by Epigeum. These covered all aspects of research integrity and had five subject-related strands (e.g. biomedical, social science) allowing users to take a subject-specific module. These modules used a variety of teaching techniques and provided links to additional material such as video interviews and reports (newspaper and journal) to allow users to explore further if they wished (see below).

If online training could be used for basic training, it would be feasible for departments, colleges and the university to work together to identify the groups that need advanced training in specific areas related to research integrity, and to provide this.

**Recommendation 3:** That Research Policy Committee and Council recommend to the University the purchase and implementation of a suitable online system for basic training in research integrity (see below for cost estimates).

**iii. Monitoring**

RIWG identified three aspects of monitoring that need further attention. The first relates to monitoring compliance with training requirements and the second to training provision. The third involves monitoring the Code to ensure it is updated as required.

**Monitoring of training**

If research integrity is to be embedded in practice, completion of training needs to be easy to monitor and report. Use of an online system like Blackboard has attractions as responses to
questions can be checked and users given a final mark. The Epigeum system, for example, has a pass mark of 85%, and the user is provided with an e-certificate on successful completion.

Using this model, it would be possible to require all post-graduate research students to provide their e-certificate to Graduate Office as part of their probation review, such that provision of this certificate might become a requirement to progress.

For new research and research-related technical staff, approval of the completion of probation might include a requirement to supply HR with their e-certificate. A model for academic staff might require completion within a set period without which permission to apply for external research funding might be withdrawn or ethical approval for proposed research not given.

Completion of a course might be optional, but encouraged, for staff working in research-related roles within Corporate Services such as Research Support Office or Enterprise and Business Development, as well as for departmental staff such as (e.g.) departmental managers.

**Recommendation 4:** That Research Policy Committee and Council recommend to the University (Graduate Office and Human Resources) that it investigates how completion of research integrity training might become a formal part of all progression/probation systems.

**Monitoring Training Provision**

Alongside the provision of basic training, staff and students will need advanced training in aspects of research integrity that are particularly relevant to them. Identification of these areas, and provision and publicising of training opportunities, will require a co-ordinated approach across departments and corporate services.

Some aspects of advanced training could be provided through department- or college-specific training sessions, but other aspects might be best served by central provision.

Oversight will be needed to ensure that:

- Resource development is not duplicated;
- The online system is updated and maintained as required;
- New staff and students receive appropriate induction material and are aware of any requirement to complete basic or advanced training;
- Examples of best practice and training materials are shared across departments/colleges;
- Advanced training is made available and publicised widely to all who might benefit;
- Those providing the training have access to suitable resources and training and are encouraged to take advantage of this;
- Developing understanding of research integrity is valued and seen as a core competence of all researchers, fully supported by their supervisors.

**Monitoring the Code**

The provisions of the Code require annual light-touch revision with more extensive updates as changes in law or regulations require. As RIWG has disbanded, having completed its allotted work, a decision needs to be taken on where this responsibility should lie.
Recommendation 5: That Research Policy Committee and Council recommend to the University, the formation of a permanent Research Integrity Steering Group, reporting to Research Policy Committee. The Group would take responsibility for

- monitoring and updating the Code;
- providing the annual report for Council as required by RCUK;
- ensuring any online training provision is maintained and updated;
- working across the University to ensure training is available at all levels and researchers take advantage of this.

4. Resource implications

Using the cost of the data security module developed in house as a guide, and assuming that the necessary IT resources and staff expertise (for content and platform development) are available at no extra cost, RIWG estimated the cost of developing suitable materials at about £150,000, plus costs for regular updates to reflect changes in the law and practice. This was not perceived as viable in terms of staff input needed, potential development time, or value for money to the University.

RIWG also investigated the costs of a subscription to an online system to provide basic training in research integrity to all researchers. This would need to be auditable so that checks could be made on completion/take-up. Care would need to be taken to ensure that the training is UK specific, as some available systems are USA-focussed and the law operates rather differently there. Based on our enquiries with Epigeum, an annual, University-wide, subscription would cost around £15,000 (including VAT), and the supplier would be responsible for updates and revisions.

A subscription to an externally developed, sector-specific, basic training system was seen as the most cost effective way of delivering basic training to all researchers (see Recommendation 3).

Resource implications that might arise from the need to develop and provide advanced training are not considered in this report as the level and type of training required has not yet been assessed. Nor have any resource implications of making training compulsory been assessed (e.g. monitoring certificates), but these are likely to be minor compared to the cost of training provided through any other route.

5. Risk factors

There are potentially major reputational risks to the University if an incident of research misconduct were to take place and the University were perceived not to have appropriate systems and training in place. The University has publically endorsed the Concordat and to be seen not to be adhering to the five principles would constitute a reputational risk.

With the new RCUK assurance requirements, and related ones from HEFCE, failure to provide adequate responses to the assurance questions risks reputational damage with key funding bodies. Continuing issues in this area could, at their most extreme, lead to financial penalties and the possible black-listing of individual researchers or larger groups by some or all of the major funders who require adherence to the Concordat as a condition of funding. Any block on access to research funding would have very serious financial and reputational implications.

6. Equality implications

Throughout its work RIWG has sought to ensure that all those whom the Code covers are treated equally by its provisions. The Equality Officer has reviewed the Code and will continue to assist in reviewing future revisions.
7. Timing implications

The recommendations made in this report will take a significant period to scope out and implement. If the University is to be able to report to RCUK in 2016 that it has made progress in the areas it identified in 2015 as requiring attention, then a decision to proceed along the lines proposed needs to be made urgently.

8. Conclusions

The work carried out by RIWG has shown that the University has the required procedures and policies in place to comply with the first four commitments of the Concordat, although these should remain subject to regular review and revision, and reporting requirements need to be followed.

The final commitment (to working together to strengthen the integrity of research and to reviewing progress regularly and openly) has been identified by RIWG as the one where most work still needs to be done. The same applies to Questions 3 and 4 of the RCUK assurance questionnaire which cover similar areas: ensuring all researchers (staff and students) receive suitable training in the understanding and application of research integrity issues.

RIWG has identified a number of ways, and made recommendations about, how the University can ensure it fully meets its commitments under the Concordat and RCUK assurance so that conducting research with integrity is understood by all researchers and becomes a core University value.

9. Recommendations

Recommendation 1: That Research Policy Committee and Council approve this report as the University’s 2015 annual report on research integrity.

Recommendation 2: That Research Policy Committee and Council approve these responses as draft responses to the 2015 RCUK Assurance Questionnaire.

Recommendation 3: That Research Policy Committee and Council recommend to the University the purchase and implementation of a suitable online system for basic training in research integrity at an approximate cost of £15,000 (including VAT) per annum.

Recommendation 4: That Research Policy Committee and Council recommend to the University (Graduate Office and Human Resources) that it investigates how completion of research integrity training might become a formal part of all progression/probation systems.

Recommendation 5: That Research Policy Committee and Council recommend to the University, the formation of a permanent Research Integrity Steering Group, reporting to Research Policy Committee. The Group would take responsibility for

- Leading work to embed research integrity across the University;
- Monitoring and updating the Code;
- Providing an expert voice for the University in research integrity issues;
- Providing the annual research integrity report for Council as required by RCUK;
- Ensuring any online training provision is maintained and updated;
- Working across the University to ensure training is available at all levels and researchers take advantage of this.

Any new Group should include representation from the research community and corporate services offices with relevant expertise.
10. Actions required of the Committee

The Committee is asked to note the work of the RIWG, the conclusions and to consider which of the recommendations made above to support.

Lead Authors: Professor Mark Jobling, Chair, Research Integrity Working Group & Department of Genetics
Dr Juliet Bailey, Member and Secretary, Research Integrity Working Group & Head of Research Development & Policy Support, Research Support Office

With contributions from all RIWG members.

Date of report: 12 March 2015
Appendix 1: Details of Research Integrity Working Group

Terms of Reference

a. To consider the implications of the Concordat for Research Integrity for the University
b. To gather evidence on current policies and compliance from relevant internal groups
c. To evaluate current practices and procedures in light of the Concordat
d. To consider and report on areas of improvement, suggesting mechanisms where possible
e. To work with internal stakeholders in developing reports and proposals
f. To communicate their work broadly across the University
g. To contribute to the report on implementation of the Concordat required by HEFCE
h. To consider and record the potential equal opportunity impacts of decisions made by the Group (in accordance with the ‘due regard’ provisions of the Equality Act 2010).

Reports to the Research Policy Committee

Secretariat: Research Support Office

Membership

Professor Mark Jobling (Genetics; Chair)
Professor Jo Brewis (Management)
Professor Paul Cullis (Chemistry)
Professor Jose Miola (Law)
Jan Davies (Research Support Office)
Brian Berry (Research Support Office)
Dr Meera Warrier (Leicester Learning Institute)
Dr Juliet Bailey (Research Support Office; also Secretary)

Groups consulted over revisions to Research Code of Conduct

1. Enterprise and Business Development
2. Library
3. University Ethics Committee
4. IT Services
5. Human Resources
6. Information Assurance Services & Data Protection Officer
7. Academic Registrar
8. Governance Office
9. Development and Alumni Relations Office
10. Pro Vice Chancellor Research and Enterprise
11. Research Policy Committee
12. Research Governance Office
13. University Legal Advisor
14. UK Research Integrity Office
15. Equalities Officer