

Foreword

1. Our vision is to be a world-leading, research-excellent, educationally outstanding university, driven by creativity and curiosity, which fulfils its social, cultural and economic obligations to Cardiff, Wales, the UK, and the world ([The Way Forward, 2018-2023: Recast COVID-19](#)).
2. Notwithstanding the challenges posed by the global pandemic, research remains a core part of our institutional identity. Our ambition to be amongst the best UK Universities in generating new knowledge and tools in partnership with stakeholders, facilitated by a vibrant and inclusive research environment, remains unchanged. This vision is a vital part of accelerating the contributions that Cardiff University makes to the health, wealth, security, and well-being of future generations in Wales, in the UK and globally. Research integrity, ethics and open research is a critical part of this vision.
3. Cardiff University is committed to upholding the principles of the [Concordat to Support Research Integrity](#) ('Concordat'), and has robust systems in place to support its researchers to conduct research to the highest professional standards.

Purpose and context

4. To improve accountability and provide assurance that measures are being taken to support high standards of research integrity, the Concordat requires that all employers of researchers prepare and publish an annual statement on research integrity ('Annual Statement'), which provides:
 - 4.1. A summary of actions and activities undertaken to support and strengthen understanding and application of research integrity issues;
 - 4.2. Assurances that the processes in place for dealing with allegations of misconduct are transparent, timely, robust and fair, and that they continue to be appropriate to the needs of the organisation;
 - 4.3. A high-level statement on any formal investigations of research misconduct that have been undertaken, including data on the number of investigations;
 - 4.4. A statement on what the University has learned from any formal investigations of research misconduct that have been undertaken, including what lessons have been learned to prevent the same type of incident re-occurring; and

- 4.5. A statement on how the University creates and embeds a research environment in which all staff, researchers and students feel comfortable to report instances of misconduct.

Note: The requirements stated in paragraphs 4.4 and 4.5 above were introduced as part of the most recent Concordat revision (October 2019) and therefore do not appear in previous Annual Statements published by the University.

5. This is the University's fourth Annual Statement and has been prepared for the University's governing body (its 'Council'). This Annual Statement will be made publicly available on the University's website and a link provided to the Secretariat of the Signatories to the Concordat, as required by the Concordat.

Period covered by this Annual Statement

6. This Annual Statement summarises the actions and activities undertaken during the 2019/2020 Academic Year to strengthen research integrity. It also provides the required assurances and statements on research misconduct and the research environment for the same time period.
7. For detailed information about the University's overarching approach and framework for research integrity and research misconduct, please refer to the University's [first Annual Statement](#) published in July 2017.

Actions and activities (2019/2020 Academic Year)

Research integrity has continued to be a key focus area for the University during the 2019/2020 Academic Year. Key activity during this period to help support and strengthen research integrity is set out below.

8. Update to URIEC name and Terms of Reference

- 8.1. The Terms of Reference for the University Research Integrity and Ethics Committee ('URIEC') have been updated to ensure that 'open research' and 'responsible metrics' are appropriately captured (and fall within the Committee's remit). The following additions were made in particular:

- *"We are committed to working with our staff and students to develop innovative approaches to support Open Research and the responsible use of research metrics"*
- *"The Committee will act as an oversight body, and receive reports, to ensure that the University meets the requirements of Open Research and the San Francisco Declaration on Research Assessment (DORA)"*

- 8.2. To reflect the above, and the University's commitment to Open Research more broadly, the name of the Committee has also changed to the 'Open Research Integrity and Ethics Committee' ('ORIEC').

9. Review of revised Concordat and University's performance

- 9.1. Following publication of the revised Concordat in October 2019, the University's Research Integrity, Governance and Ethics Team (RIGE) commenced a preliminary review of the University's performance against the revised Concordat (with the exception of the obligations contained in Commitment 4, which will be subject to a separate review).
- 9.2. On 28 January 2020 the Concordat revisions, together with the conclusions of the preliminary review, were discussed by ORIEC. As a result of the pro-active steps already taken by the University to promote and embed research integrity, the University had already positioned itself positively against the revised Concordat requirements. Notwithstanding this, several areas for improvement were identified through the preliminary review (together with relevant actions) to further enhance research integrity across the University.
- 9.3. RIGE is currently overseeing implementation of the areas for improvement and actions noted in paragraph 9.2 but is confident that the University has met (or will meet through its usual processes) the minimum requirements for employers of researchers and that it will, in many cases, exceed such requirements.

10. Research Integrity Online Training Programme ('RI Training')

- 10.1. At the start of the 2019/2020 Academic Year, completion of the University's RI Training became mandatory for all Academic Staff (having previously been mandatory for new Academic Staff on specific career pathways only). The RI Training continues to be mandatory for students completing a Doctoral, MPhil or MRes programme. The expansion of the mandatory completion group reflects the University's serious commitment to embedding a culture of research integrity across the institution.
- 10.2. During the 2019/2020 Academic Year, 1,523 staff and students completed the training programme.
- 10.3. In addition to expanding the mandatory completion group, a number of content updates were also made to the RI Training, including the addition of new content on responsible metrics/responsible research assessment and supervision responsibilities (particularly in relation to oversight of the ethical review process, for projects requiring ethical review). Updates were also made to reflect the revised Concordat.
- 10.4. In respect of the student version of the RI Training in particular, the content has also been updated to incorporate more practical exercises and reflection opportunities (including the addition of research integrity dilemmas/case studies) and the addition of new material on questionable research practice. Some of these changes will be incorporated into the staff version of the RI Training at the start of the 2020/2021 Academic Year.

11. Review of Research Ethics Procedures

- 11.1. As reported in the University's 2018/2019 Annual Statement, the University undertook a review of its Research Ethics Procedures for research involving human participants, human material or human data and required that all School Research Ethics Committees (SRECs) implement a set of new procedures and templates from the start of the 2019/2020 Academic Year. As a result of feedback obtained from SRECs via the usual annual reporting process (to ORIEC), together with the impact of strike action and the COVID-19 pandemic, the implementation period has been extended until the start of the 2021/2022 Academic Year.
- 11.2. Notwithstanding the above, several updates to the template procedures and supporting documents were agreed by ORIEC in May 2020, to reflect feedback from SRECs as part of the annual reporting process. RIGE has also implemented systems to increase information-sharing between SRECs and improve consistency, whilst reducing duplication. Examples include: a workshop for SREC Chairs in December 2019, and the creation of a new Microsoft Teams page for SREC Chairs and Administrators and representatives from RIGE.
- 11.3. Linked to the above activity and a common query arising from SRECs, a Task and Finish Group was established in Spring 2020 to map the use of secondary or publicly available data in research across the University, and to explore the extent to which the University requires such projects to undergo ethical review. The Task and Finish Group is aiming to present its conclusions and recommendations to ORIEC during the 2020/2021 Academic Year.

12. COVID-19: Conducting Human Participant Research

- 12.1. As a result of the COVID-19 pandemic, the University undertook numerous actions to ensure the safety of its staff, students and participants involved in research. This included the formation of a Human Participant Research Task and Finish Group to set out the conditions under which research projects involving face to face contact with human participants (both clinical and non-clinical) may recommence and the mitigation measures that should be put in place to ensure the safety of researchers and their research participants.
- 12.2. The University's position is that, where possible, human participant research should be conducted remotely (such as via digital tools) for as long as there are social distancing restrictions in place. New guidance has been developed to help researchers undertaking remote human participant research, including accessing and managing research data remotely and conducting interviews using video and telephone conference methods.
- 12.3. Where conducting research remotely is not possible, a risk assessment must be undertaken to identify risks to researchers and participants involved in the project and ensure application of appropriate mitigation measures prior to the start of human participant research.

13. Research Culture

13.1. The University is committed to fostering a positive, supportive, and creative research culture which encourages, and enables, its researchers to succeed and develop.

13.2. In April 2020, the University established a Research Culture Working Group (RCWG), chaired by the University's Dean of Research Environment and Culture. The Terms of Reference for the RCWG are summarised below:

- To synthesise the main outcomes of the Wellcome Trust's '*What Researchers think about the culture they work in*' report (January 2020)
- To identify activities that Cardiff University is already undertaking with regards to promoting a positive research culture, aligned to the main themes outlined in Wellcome's report.
- To consider what solutions might be needed to address any gaps (where possible) and what benefits could derive from any intervention(s).
- To develop an integrated action plan for research culture, the new Concordat to Support the Career Development of Researchers and Research Integrity.

13.3. On 18 September 2020, the University hosted a regional Wellcome Trust 'Reimagine Research Virtual Townhall' event. The event was attended by 100 members of the local and regional research community, reflecting voices from across career stages and disciplines including academics, support staff, researcher associations, union members, learned societies, EDI and HR professionals from across the GW4, Wales and South-West research community. This event formed part of a wider set of regional townhall events, responding to the 'Reimagine Research' survey commissioned by the Wellcome Trust in 2019. The event created a virtual space for research communities to digest the findings of Wellcome's Report; to reflect on what a better research culture looks like; and to share ideas for cultural change.

13.4. Feedback obtained from the above event (and others) will be collated by Wellcome Trust to support setting clear goals for the Trust. These goals and recommendations will be shared with Cardiff University, supporting ongoing University initiatives to progress positive and inclusive research culture ambitions.

13.5. Whilst the above activities are not specific to research integrity, the success of the University's research culture initiatives will impact significantly on the nurturing of research integrity. Similarly, the success of the University's research integrity initiatives will help to foster a positive working environment in which the underlying principles of the Concordat (honesty, transparency, care and respect, rigour and accountability) are valued. As such, the University recognises the importance of ensuring that its research integrity and research culture activities are aligned and mutually reinforcing.

14. Open Research and Transparency

14.1. During the 2019/2020 Academic Year, the University approved an Open Research Position Statement and Open Research Action Plan, prepared by the University's Open Research Operational Group (who report to ORIEC). The purpose of these documents is to help ensure that the University is at the forefront of open research best practice and actively addresses specific areas (e.g. reproducibility, registered reports, registration of Clinical Trials on public registries).

14.2. The University has also become members of the UK Reproducibility Network (UKRN), an independent network of stakeholders in the UK dedicated to improving the quality and reproducibility of academic research outputs. This represents an important part of the University's commitment to develop an Open Research culture that embraces a range of actions to improve the quality, integrity and accessibility of its research.

14.3. An updated role description for the University's Research Integrity Leads (soon to be renamed 'Open Research Integrity Leads') has also been approved, incorporating specific responsibilities relating to open research. It is anticipated that the School Open Research Integrity Lead roles will be advertised and filled within each School during the 2020/2021 Academic Year.

15. Responsible use of research metrics

15.1. On 13 November 2019, the University formally signed the San Francisco Declaration on Research Assessment (DORA). A dedicated Responsible Research Assessment Officer has been appointed by the University to support the delivery of the University's DORA Action Plan and to facilitate the use of responsible research metrics at the University.

15.2. Further information about responsible research assessment/responsible metrics at Cardiff University is available via the University's Responsible Research Assessment [webpage](#).

16. Human Tissue Research

16.1. In 2019-2020 the University has strengthened its procedure for the transfer of material considered relevant under the Human Tissue Act 2004. Relevant Material transferring from an internal licence-exempt research project with NHS Research Ethics Committee approval to the Human Tissue Authority Research Licence for continued storage and use must now undergo a rigorous audit of consent, traceability and premises. In addition, all transfers of Relevant Material into or out of the University must also undergo review of consent documentation to ensure the consent is appropriate for the intended use and fully warranted in the material transfer agreement. These additions have supported and strengthened the already robust approach to human tissue governance within the University.

17. Security-sensitive Research

17.1. In Spring 2020, RIGE commenced a review of the University's Security Sensitive Research Policy ('SSR Policy'). Whilst the review has been placed on hold in light of other priorities and challenges arising from the pandemic, the review will primarily focus on:

- the extent to which changes are required to reflect the revised 'Oversight of security-sensitive research material in UK Universities' guidance published in November 2019;
- the CU definition of SSR and whether this remains fit for purpose, or should be expanded;
- how to effectively manage research subject to security clearance;
- any updates required to improve clarity and/or overall operation of the policy (based on its use to date and feedback obtained).

18. External engagement and sharing best practice

18.1. During the 2019/2020 Academic Year, the University has continued to engage with external groups and organisations to share best practice and explore effective governance arrangements for the promotion of research integrity. In particular, the University continues to be an active member of the Russell Group Research Integrity Forum (RGRIF) and RIGE provides feedback from RGRIF events to relevant University teams and committees, including ORIEC. The University also ensures RIGE attendance at meetings of the Association of University Sponsors wherever possible.

18.2. The University continues to subscribe to the UK Research Integrity Office (UKRIO) and intends to utilise the revised UKRIO Self-Assessment Tool (once available) to review the University's performance against the revised Concordat. Following the announcement of the UKRIO 2020 Seminar Series (a replacement for its Annual Conference and other events, cancelled in light of the pandemic), the University has ensured the attendance of at least one University representative at each of the seminars.

Planned activities

19. In addition to the continuation of many of the activities mentioned above, there are several research integrity activities planned for the next Academic Year including:

19.1. Detailed review of University's performance against revised Concordat

PRIORITY AREA

RIGE will commence, and co-ordinate, a detailed review of the University's performance against the revised Concordat utilising the UKRIO Self-Assessment Tool and/or the UUK Checklist (once available). ORIEC will have oversight responsibility for this activity.

19.2. Policy and Procedure reviews

RIGE will commence, and co-ordinate, a review of the University's Research Integrity and Governance Code of Practice (the University's

framework for good research practice) to ensure it remains accurate and fit for purpose.

The University's Compliance and Risk Team will oversee, with assistance from a dedicated working group, the review of the University's Academic Research Misconduct Procedure to ensure it aligns with the revised Concordat and emerging best practice in this area.

19.3. Supporting implementation of revised Research Ethics procedures and templates

RIGE and ORIEC will continue to support SRECs with implementation of the new procedures and templates, and intends to host and/or deliver a variety of engagement events and activities during the next Academic Year to enable increased information-sharing and training opportunities for SREC Chairs and Members.

19.4. Open Research Integrity Leads

During the next Academic Year, the University intends to advertise and appoint School Open Research Integrity Leads, utilising the new role description referenced in paragraph 14.3.

19.5. Export Controls

RIGE intends to commence, and co-ordinate, the development of an institutional 'Export Controls and Sanctions Policy'. Representatives from the University's Research and Innovation Services have already attended several Export Control events during the 2019/2020 Academic Year and have formed an initial working group to discuss the actions required by the University. The University has also ensured representation on the newly formed Russell Group Export Control Forum.

Dealing with allegations of Research Misconduct

20. The University is committed to ensuring that its processes for dealing with allegations of research misconduct are transparent, timely, robust, fair, and appropriate to the University's needs.

21. The University takes all allegations of Academic Research Misconduct seriously and has a dedicated procedure to deal with such allegations. The University's Academic Research Misconduct Procedure (ARM Procedure), together with a named contact, is publicly available on the University's [website](#).

22. There are three stages to the ARM Procedure. At each stage the allegation may be dismissed or may proceed to the next stage:

22.1.A Preliminary Stage where the Named Person, in consultation with the PVC and normally within 20 working days, conducts a preliminary review of the allegation. In order to reach a decision, the Named Person may seek the advice of an internal expert on the seriousness and credibility of the concerns.

22.2.A Screening Stage where, normally within 30 working days, a Panel of up to three internal members of staff with relevant expertise and academic standing will conduct a preliminary evaluation of all relevant material

relating to the allegation supplied by the Complainant and the Respondent and seek further clarification if required. The Screening Panel will make a confidential written report of its evaluation and decision and lodge it with the Named Person.

22.3. A Formal Investigation Stage where a Panel is set up, consisting of an impartial, independent Chair and two impartial members with appropriate expertise and seniority. The Chair and at least one of the two members should be external to the University, being neither a person employed by or contracted to the University. The internal member should not be a member of staff in the same School as the Respondent.

23. There is currently a working group set up to revise the ARM Procedure in line with the revised Concordat. This group will aim to prepare a revised ARM Procedure during the 2020 Autumn/Winter term and will aim to submit the revised ARM Procedure to ORIEC for initial review and approval in early 2021.

Statement on formal investigations of Academic Research Misconduct

24. During the 2019/2020 Academic Year, two allegations/sets of allegations have been received under the University's ARM Procedure (ARM 20.01 and ARM 20.02). Of these allegations:

24.1. For 20.01 the Preliminary Review concluded that the allegations could not be investigated under the University's ARM procedures as the research was not carried out under the auspices of Cardiff University. The journal was contacted to request an amendment to the incorrect affiliation on the paper.

24.2. Allegation 20.02 is ongoing following some delays due to the COVID 19 lockdown. The complainant has been notified of the delays. A Preliminary Review has been completed and the allegations will be considered by a Screening Panel.

What has the University learned from the formal investigations?

25. The following lessons have been learnt from the ARM investigations carried out during the 2019/2020 Academic Year:

25.1. That the ARM Procedure needs to be extended to include all research carried out 'under the auspices' of Cardiff University and some thought needs to be given to how this is defined. This will be addressed in the revised ARM Procedure.

25.2. That as ARM allegations can relate to historical research carried out in some cases more than 20 years ago, consideration needs to be given to the University's Research Records Retention Schedule and providing clear guidance on the period for which information must be kept. The University's Records Manager has planned some targeted work regarding a records management plan that also sets out the strategy for communicating with stakeholders about the revised records management policy. The aims of the plan are to:

- increase awareness amongst staff of their records management responsibilities under the new policy.
- listen and engage with stakeholders to identify legitimate obstacles and records management needs in order to incorporate into University records management strategy.
- promote and increase good records management practice.
- mitigate risks to University from poor recordkeeping practice

25.3. That the categories of ARM are not always clear to complainants and, as such, the planned ARM Procedure revision will aim to clarify this as well as bringing the categories of ARM in line with the revised Concordat.

Creating and embedding a research environment in which all staff, researchers and students feel comfortable to report instances of misconduct

26. The University is committed to fostering an environment in which all its staff and students are able to report misconduct and feel supported through this process. The University has several mechanisms and enablers for this including:

- The availability of advice and support from central University teams/contacts on a range of topics and themes including research integrity, research ethics, research culture, responsible research assessment and whistleblowing.
- A named point of contact for ARM allegations.
- A network of School Research Integrity Leads and Ethics Officers (local points of contact).
- The University's Research Integrity Training which contains dedicated content on research misconduct reporting and signposts internal support and the availability of UKRIO as a source of external, independent advice.
- The delivery of bespoke research integrity and/or research misconduct training sessions to Schools where required or requested.

27. The University will continue to review and monitor its approach in this area and will look to review any recommendations made by UKRIO within its Self-Assessment Tool (once available).

Preparation of this Annual Statement

28. Preparation of this Annual Statement was co-ordinated by the University's Research Integrity, Governance and Ethics team. A draft of this statement was presented to the University's Executive Board (UEB) for note and to ORIEC for debate and initial approval. The Annual Statement was noted by UEB and approved by ORIEC on 03 November 2020.

29. The Annual Statement was presented at further meetings of the University's Governance Committee on 09 November 2020, Senate on 11 November 2020, and Audit Committee on 16 November 2020, before proceeding to Council for formal approval on 23 November 2020.

Professor Kim Graham
Pro Vice-Chancellor for Research, Innovation and Enterprise
December 2020

Acronym key

ARM	Academic Research Misconduct
DORA	Declaration on Research Assessment
ORIEC	Open Research Integrity and Ethics Committee
RCWG	Research Culture Working Group
RGRIF	Russell Group Research Integrity Forum
RIGE	Research Integrity, Governance and Ethics Team
SREC	Schools Research Ethics committee
SSR	Security-sensitive Research
UEB	University Executive Board
UKRIO	UK Research Integrity Office
UKRN	UK Reproducibility Network
URIEC	University Research Integrity and Ethics Committee
UUK	Universities UK