Annual Statement on Research Integrity

November 2022

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. Research is a core part of our institutional identity, and the University aspires to be amongst the best in generating new knowledge and tools, facilitated by a vibrant and inclusive research environment.

3. In the 2021 Research Excellence Framework, 90% of our research was confirmed as world-leading or internationally excellent and we secured our place as a top 20 University in the UK for the overall quality of our research. The University is seeking to enhance its position even further and embraces this challenge within an increasingly competitive international stage.

4. Research integrity, ethics and open research is a critical part of the University's vision and the 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.

5. This is the University's sixth Annual Statement. Once approved by the relevant University committees, the 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.

6. The University's historic Annual Statements remain publicly accessible on our "Research Integrity and Governance" webpage.

Period covered by this Annual Statement

7. This Annual Statement summarises the actions and activities undertaken during the 2021/2022 Academic Year to strengthen research integrity/good research practice. It also provides the required assurances and statements on research misconduct and the research environment for the same time period.

Actions and activities (2021/2022 Academic Year)

During the 2021/2022 Academic Year, the University has undertaken a wide range of activities to help support and strengthen research integrity. Key activity during this period is summarised below.

8. Detailed review of the University's implementation of the Concordat

8.1. The University has commenced a detailed review of its implementation of the Concordat, utilising the new edition of the UKRIO Self-Assessment Tool. The purpose of the review is to reflect on our research integrity provision and to identify areas of the University's practice, policy and culture that may benefit from revision to further bolster our commitment to research integrity and the support offered to researchers in this area.

8.2. The review exercise is being led by the University's Research Integrity, Governance and Ethics ('RIGE') team, engaging with various stakeholder groups across the University and reporting to the University's Open Research Integrity and Ethics Committee ('ORIEC')[1].

8.3. At the time of preparing this Annual Statement, 90% of the Self-Assessment questions have been fully assessed and a number of action areas have been identified. Once all questions have been fully assessed, a Research Integrity Action Plan will be prepared and presented to ORIEC for approval (alongside other internal groups and committees as required). Once approved, it is anticipated that progress against the stated actions will be reviewed annually up until the date of a future Self-Assessment exercise and/or similar review exercise (likely to be conducted every 5 years to align with the review cycle for the Concordat).

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[1] ORIEC is the strategic oversight body for research integrity-related matters at Cardiff University and helps to ensure that the University meets the requirements of the Concordat and has appropriate systems in place to support and strengthen research integrity across the University.

8.4. Engagement with key stakeholders across the University will be key in finalising the Research Integrity Action Plan to ensure it is fit for purpose and complements existing Actions Plans in other areas (e.g. Researcher Development and Research Culture).

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

9.1. During the 2021/2022 Academic Year, over 4,300 staff and students completed the RI Training, compared to just over 2,300 during the previous Academic Year. A significant uptake in RI Training completion by UG and PGT students during the 2021/2022 Academic Year contributed to this substantial increase in completion figures. As referenced in previous Annual Statements, Cardiff University has developed its own RI Training (first launched in 2017) which is mandatory for all Academic Staff and for students undertaking Doctoral, MRes or MPhil programmes of study. It is also mandatory for any researcher applying to a School Research Ethics Committee for ethical review of a Human Research project. Completion of the training is also highly recommended for anyone else involved in research at the University.

9.2. Notwithstanding that completion of the RI Training is mandatory for some staff and student groups, securing completion of the training by such groups and undertaking monitoring and reporting activity is challenging, particularly given the University's size and structure. As such, various actions have been taken and/or identified to embed completion of the RI Training into existing processes and to improve the way in which the RI Training is communicated, monitored, and reported. There is also a broader piece of work taking place across the University's Professional Services departments aimed at exploring the creation of a mandatory training policy for the University which will provide clarity on roles and responsibilities, compliance, and reporting.

9.3. To ensure the University's RI Training remains fit for purpose, a review has been conducted of all staff and student feedback provided over the last 2-3 years. The feedback was broadly positive, with many staff and students confirming the value and importance of the training. Some common terms and phrases used to describe the training were "useful", "helpful", "informative, "well structured" and "easy to follow". However, the review also identified a number of areas requiring improvement or further exploration, including the development of discipline-specific case studies and content, increasing the use of interactive exercises and/or videos (to replace some text-based content) and improving IT/system-based troubleshooting guidance and signposting.

10. Research Ethics

10.1. Supporting our School Research Ethics Committees ('SRECs') with implementation of the new ORIEC-approved procedures and templates, and promoting the highest ethical standards in research, has continued to be a key focus area for the University. Below are just some examples of relevant activity overseen by RIGE and/or ORIEC during the 2021/2022 Academic Year:

- **Revision of Annual Ethics Report proforma**
  The Annual Ethics Report proforma is a document completed by Schools as part of their annual research ethics reporting duty to ORIEC. The proforma was updated to capture additional information about:
  - The use of "Group Applications" by SRECs and the use of supervisors or non-SREC Members as "Second Reviewers" for projects eligible for proportionate review
  - Approaches to the recording of conflicts of interest declared by SREC Members
  - Local Professional Services support for SREC operations
  - New or emerging trends in ethical review applications

    The above were in addition to capturing the usual information about SREC application numbers, SREC Membership, Human Research projects proceeding prior to receiving a favourable ethical opinion and matters of concern. SRECs were also asked to submit their procedural documents and two ethical review applications reviewed by the SREC during 2021.

- **Review of Annual Ethics Reports and supporting documents**
  The reports and supporting documents received from Schools were reviewed by RIGE and a summary provided to ORIEC. The reports confirm that over 2,500 applications were reviewed in accordance with our SREC procedures during the 2021 calendar year, with 97% of applications ultimately receiving a favourable ethical opinion. The Annual Ethics reporting process enabled RIGE to identify a number of common themes and areas requiring further attention, together with areas of best practice and the identification of SREC-specific issues or challenges. RIGE has engaged with SRECs via bespoke communications and an all-SREC webinar hosted in September 2022 to ensure that the common themes arising from the Annual Ethics Reporting process are communicated and to encourage discussion and reflection.

- **Consideration of "deviation" requests made by specific SRECs**
  ORIEC considered requests from two SRECs to deviate from the ORIEC-approved ethical review procedure. Both deviation requests related to the ethical review process for Undergraduate ('UG') and Postgraduate Taught ('PGT') projects, and both were approved on a short-term basis as a result of a very compelling case put forward by the SREC. A broader piece of work was also approved by ORIEC in this area (see below).

- **Creation of a University Task and Finish Group to consider and propose an alternative robust and proportionate process for the ethical review of UG and PGT educational projects involving humans, human data or human tissue**
  This Group was formed as a result of concerns raised by some SRECs regarding the applicability of the ORIEC-approved ethical review process to certain UG and PGT projects, most notably dissertations and projects aimed at helping students to practice research methods. The concerns centre on whether such projects are truly "research", whether the ORIEC-approved process is proportionate for such projects (in

either case), the impact on SREC and staff workloads in having to review/prepare such applications and the impact on the student experience. The Group first met in July 2022 and is aiming to recommend a new framework for the ethical review of such projects by February 2023.

- **Decision to re-convene a historic University Task and Finish Group to revisit the University's Framework for the Ethical Review of Research using Secondary Data and/or Publicly Available Data only**.
  This Group is expected to re-convene during the 2022/2023 Academic Year and will be asked to consider any changes required to the Framework in light of user feedback, to oversee the development of further guidance on projects involving access to/use of social media data and to consider a range of ways in which the University's ethical review process could be simplified for research projects utilising Secondary Data and/or Publicly Available Information only.

- **Publication of an updated SREC "FAQ" document and provision of advice and guidance to SRECs on a variety of topics**
  Examples include the provision of advice and guidance on:
  o The operation of a "Group Application" process for ethical review
  o The circumstances where a "favourable with conditions" ethical review outcome should be issued, compared to a "provisional/pending" outcome and the extent to which a researcher can commence their research following receipt of these outcomes.
  o The supporting documents to be reviewed by a SREC (alongside the ethical review application form) and in what format.

10.2. Alongside the work conducted centrally, a significant amount of work has been conducted locally by SREC Chairs, Members and local support staff to achieve implementation of the new ethics procedures and to support researchers in achieving the highest ethical standards. Below are some examples of activity that has taken place locally:
- Creation of Ethics Protocols/Standard Operating Procedures for research projects meeting a specific "full review criterion".
- Implementation of a Group Application process for ethical review.
- Development of local and/or disciplinary guidance on the ethical review process and SREC expectations.
- Information/awareness-raising sessions for staff and students on the ethical review process and common ethical issues arising in the discipline.
- Provision of ethics training to staff and students.
- Engagement with teaching and learning colleagues to better understand the types of student project conducted in the School, the extent to which such projects are "Research" and what solutions could be implemented locally to manage the ethical review of such projects.
- Linked to the above, providing RIGE and ORIEC with feedback and suggestions for improving the ethical review process (specifically for student projects).

11. Research Misconduct

11.1. The University has been carrying out a comprehensive review and update of its [Academic Research Misconduct ('ARM') Procedure](). In January 2022, ORIEC approved a set of "Phase 1" amendments to the ARM Procedure that updated the definition of ARM to bring it in line with the definition contained in the revised Concordat. The Phase 1 amendments also confirmed that the role of the 'Named Person' will be carried out by the University Secretary and General Counsel.

11.2. The second phase of the ARM Procedure review is still underway and has included providing clarity on the procedure for ARM allegations and also focussed on the information and support provided to all involved in an allegation – including complainants and respondents. A key consideration has also related to how the ARM Procedure interacts with other key University procedures including staff grievance/disciplinary procedures. The University has also incorporated the draft guidance and template produced by UKRIO where appropriate.

11.3. It is planned that consultation and agreement of the draft revised ARM Procedure will be completed in 2022/2023.

11.4. In relation to the handling of misconduct allegations against students, the University's Academic Integrity Policy has been updated so that it now includes a definition of Academic Misconduct in Research. The definition aligns with the University's definition of ARM for staff. This update has helped to ensure that the University has a clear and complete definition of what constitutes research misconduct in student policy, consistent with statements that apply to other researchers and supports compliance with the Concordat.

11.5. The following amendments have also been made to the University's Academic Misconduct Procedure for Research Students to help ensure alignment to the principles of the Concordat:

- a statement has been added to confirm that the procedure will continue to its conclusion if a student leaves the University during the course of an investigation, so that all necessary actions, including reporting to external partners, such as publishers, will be completed;
- the procedure has been clarified regarding the reporting of any allegations to ensure onward reporting, where necessary, to funders (e.g. UKRI);
- an external member is now included in the Stage 3 Academic Integrity Panel where the allegations concern research misconduct.

11.6. The Academic Misconduct Procedure for students on Taught Programmes of Study was not changed for the 2021/2022 Academic Year and the procedure continues to meet the requirements of the Office of the Independent Adjudicator. There are some small adjustments to the Procedure for the 2022/2023 Academic Year relating to providing clarity around the operational process and sanctions available e.g. taking account of the fact that skills training may be delivered remotely rather than in person and clarifying when decisions can be made by a Chair of Exam Board and when decisions should be escalated to an Academic Integrity

Panel. There is due to be a fuller review of the procedure during the 2022/2023 Academic Year, alongside a broader project looking at the University's approach to Academic Integrity and developing skills.

12. Clinical Research

12.1. Work has continued on improving Clinical Trial transparency, with 86% of Cardiff University's 'due' trials having reported results (up from 72% in September 2021). Actions have been identified to increase the reporting of results of CU-Sponsored CTIMPs on the EU Trial Tracker website. This activity is overseen by the University's Clinical Trial of an Investigational Medicinal Product Governance Group.

12.2. A Joint Research Office has been established with Cardiff and Vale University Health Board to support the development, set up and approvals of health research in Cardiff.

12.3. In May 2022, NHS-Digital conducted an audit of the University's 'AML 15' trial, focussing on Information Transfer, Access Control and Data Destruction. The audit findings are publicly available here. An action plan has been developed to address each finding.

13. Human Tissue Act (HTA) Research and Governance

13.1. HTA governance reporting lines and risk management between the Human Tissue Standards Committee ('HTSC')[2] and the College of Biomedical and Life Sciences ('BLS'), where virtually all HTA-related activity takes place, have been refined and formalised. In particular:

- HTSC will receive assurances from the Corporate Licence Holder Contact, through their role as Chair of BLS College Board, that risks associated with HTA compliance are being managed appropriately within BLS. The Corporate Licence Holder Contact (who is also the Pro Vice-Chancellor (PVC) BLS) will also provide HTSC with wider compliance assurances from the College of Arts, Humanities and Social Sciences ('AHSS') and College of Physical Sciences and Engineering ('PSE') through:
  o Annual reports and news updates at University Executive Board
  o Ad hoc meetings with PVC AHSS and PVC PSE
  All of the above will enable HTSC to review HTA-related decisions made at a college-level and escalate in the unlikely event that decisions are deemed counter to regulatory compliance. This new reporting line was formalised in the HTSC terms of reference in May 2022.
- The Designated Individual for the university-wide Research Licence and the HTA Manager will prepare an annual report to be considered at BLS College Board. The report will include a summary of compliance and actions needed at a college or school level, and a review of any previous actions. The first formal report was taken to BLS College Board in March 2022.
- In 2021, the HTA Manager developed and has maintained a high-level risk register that will be used to inform, refine and develop HTA strategy

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[2] HTSC is the committee that oversees all HTA-related activity across the University.

and compliance procedures in the university. Risks will be reported annually to both HTSC (for assurance and strategy endorsement) and BLS College Board (for operational action and strategic development).

13.2. The University has developed a self-assessment for Chief Investigators to evaluate whether consent is valid and appropriate for relevant material to be retained under an HTA Licence at study completion. The self-assessments will be reviewed by the HTA Compliance Team before material is permitted under an HTA Licence. The new process will be rolled out during the 2022-2023 academic year.

13.3. Work commenced on scoping the requirements for the redevelopment of the online database containing details of all human tissue studies or collections in the university. This will continue into the 2022/2023 Academic Year.

14. Animal Research and Governance

14.1. The 2021/2022 Academic Year saw more of a 'return to normal', following the upheaval of the previous year, in terms of researchers being on site and procedural work taking place without restrictions. The technical team has continued to support researchers with their focus being on the daily care, maintenance, and welfare checks of animals on site.

14.2. A significant change to affect the area of animal research was the announcement of a Change Programme by the Animals in Science Regulation Unit ('ASRU'), the government department which regulates work performed under the auspices of the Animal (Scientific Procedures) Act 1986 ('ASPA'). This programme resulted in changes to all interactions with ASRU, including the way the University interacts and communicates with them, and the way the University will be inspected and audited in the future. This prompted the University's Biological Services department to undertake a review of processes and systems in preparation for a future audit. The change programme has also resulted in a change to certain processes undertaken by the Biological Services team.

14.3. Cardiff University, as part of GW4[3], provides funding for a Regional Programme Manager ('RPM') for the National Centre for the Replacement, Refinement and Reduction of Animals in Research ('NC3Rs'), who provides training, advice and ensures sharing of good practice. Working with the RPM ensures those working with animals are up to date with all 3Rs developments. The 2021/2022 Academic Year saw the establishment of an Early Careers Researcher 3Rs Group and one of the University's researchers receive the highly commended award for the International 3Rs prize from the NC3Rs.

14.4. A focus for the last year has been training records for licensees under ASPA, with the Named Training and Competency Officer undertaking a training records audit. This ensures all records are up to date but also

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[3] A research consortium comprising the University of Bath, the University of Bristol, Cardiff University and the University of Exeter.

ensures a robust system is in place for the provision of specialist training across the establishment.

15. Research Culture

15.1. Research culture has continued to be a key focus area for the University during the 2021/2022 Academic Year. The University is committed to fostering a supportive, creative, inclusive and open research culture which enables its researchers to succeed and develop.

15.2. In December 2021, senior management endorsed a proposal for "Transforming Research Cultures" at Cardiff University, inclusive of strategic priorities and action areas. The proposal includes an increased focus on addressing systemic and structural issues affecting the research population at Cardiff, as well as support for responsible research assessment, open research and enhanced recognition of the contribution of everyone involved in research. In September 2022, senior management endorsed a further proposal to promote activities associated with implementation of this strategy under the project name *"thrive | ffynnu at Cardiff"*, as well as to launch a research culture survey in Autumn 2022. This survey will include measures relating to research integrity.

15.3. The University's Research Culture Working Group ('RCWG'), which includes representatives in the areas of research integrity and research misconduct, has continued to meet and engage during the 2021/2022 Academic Year. Below are some examples of activity conducted over the last Academic Year to help ensure that research integrity forms part of broader discussions relating to research culture and is not managed in isolation. It is hoped that continued engagement between RIGE and the RCWG, together with some overlap in ORIEC and RCWG membership, will help to ensure that research integrity and research culture-related work are mutually reinforcing:

- March 2022 - Members of the RCWG were provided with an overview of the UKRIO Self-Assessment Tool and the review exercise referenced at paragraph 8 above. Members were asked to reflect on specific research integrity culture-related questions and to provide feedback and suggestions on proposed action areas.
- May to August 2022 - Initial consideration and planning for the development of a Cardiff University Research Culture Survey (inclusive of questions relating to good research practice and research misconduct).
- July 2022 – Members of the RCWG were asked to provide input on a revised version of the University's Academic Research Misconduct Procedures.
- September 2022 – Members of the RCWG were asked to provide input on this Annual Statement.

15.4. Implementing the Transforming Research Cultures proposal under the auspices of the *"thrive | ffynnu at Cardiff"* project will continue to be a key action area for the University during the 2022/2023 Academic Year. The University has created two new Research Culture posts (one at 'Officer' level and one at 'Manager' level) to help take this work forwards.

Recruitment for these posts is currently ongoing, and it is hoped that the post holders will have started in their positions before the end of 2022.

16. Open Research and Transparency

16.1. The work of the University's Open Research Operational Group ('OROG') has continued, with College-level 'Open Research and Integrity Leads' now appointed. OROG is currently reviewing the School-level 'Open Research and Integrity Lead' role description and considering the extent to which this distinct role could be re-framed as a set of 'open research' and 'integrity' responsibilities that each School must ensure are addressed. These responsibilities could then be integrated into one or more School research leadership roles to best fit the needs and structure of the School.

16.2. The University's Open Access Policy has been updated to align with the 2022 UKRI Open Access Policy. Training resources have also been updated to reflect these changes.

16.3. The University has been following the progress of the House of Commons' Science and Technology Committee's Reproducibility and Research Integrity Inquiry and RIGE has been providing periodic high-level updates to ORIEC.

17. Responsible research assessment

17.1. The University's DORA[4] Working Group ('DWG') successfully delivered the DORA Action Plan during the 2021/2022 Academic Year, which resulted in the amalgamation of the DWG into the broader Research Culture Working Group ('RCWG').

17.2. There has been a continued focus on training and development, with 19 Schools having received training on DORA and responsible research assessment (and four more scheduled for training during the next academic year).

17.3. A 'DORA Health Check' document has been developed by the University to monitor implementation of DORA principles at School-level. The RCWG is currently considering how best to roll this out in the context of broader monitoring of School-level practices around research culture.

17.4. CRediT (Contributor Roles Taxonomy)[5] is currently being piloted in three Schools (Biosciences, Earth and Environment Sciences, Physics and Astronomy) to allow for greater transparency and recognition of Cardiff researchers' diverse contributions to scholarly outputs.

18. Trusted Research

18.1. The University is continuing to review its approach and governance structure around Trusted Research and is undertaking a number of activities with a view to developing a Trusted Research Action Plan. This

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[4] The San Francisco Declaration on Research Assessment
[5] CRediT describes 14 roles that represent the parts typically played by contributors to a scholarly output

activity involves various stakeholders across the University including the Pro Vice-Chancellor for International and Student Recruitment and Head of the College of Physical Sciences and Engineering, and a number of professional services teams including Research and Innovation Services, Compliance and Risk, Human Resources and Registry.

18.2. To help support the review, a large amount of background work, information gathering, and engagement is taking place between the University, internal stakeholders, external groups and Government agencies. Some specific activities undertaken during the 2021/2022 Academic Year include:

- Engagement with Russell Group colleagues, the Higher Education Export Controls Association ('HEECA') and the Research Collaboration Advice Team ('RCAT') to discuss ideas and share best practice
- Awareness raising and/or training sessions with various internal committees and groups including ORIEC, University Executive Board, International Strategy Group, Professional Services Board and researchers within the School of Engineering.
- Submission of one Standard Individual Export Licence Application.
- Securing UEB approval for additional University resource and a broad proposal for managing Trusted Research and Internationalisation at Cardiff University.
- Recruitment of an additional Research Integrity and Governance Officer to provide specific support in the area of Trusted Research and in working with researchers and professional services colleagues across the University to identify, mitigate and manage risks connected with international collaboration, including the requirements of export control regulations and the National Security and Investment Act.

19. External funding practice

19.1. The University remains committed to transparency and due diligence in the management of research funding from external sources. During the 2021/2022 Academic Year, the University's new "Funders Advisory Panel", a subcommittee of Council, held its first meetings. The Funders Advisory Panel offers advice to the University's Executive on the appropriateness of the acceptance, transfer (to third parties) or rejection of external funding (from philanthropic sources, research grants and contracts, or commercial development activities). It also provides reassurance to Council in the same areas.

19.2. The work of the Funders Advisory Panel will help to ensure that the University continues to make responsible decisions, and acts with integrity, when considering external funding sources.

20. Data management

20.1. Alongside business-as-usual activity to support good practice in research data management, including the provision of data protection and records management advice and training and the completion of information security questionnaires from research funders and collaborators, a number

of actions have been taken during the 2021/2022 to further support our research community and/or ensure best practice in data management:

- Development of a pre-contract questionnaire to help those initiating research projects understand what Data Protection requirements they will have so that appropriate support can be provided at an early stage.
- Mapping of University data compliance policies to relevant funder requirements.
- Provision of data protection/data management support as part of an NHS Digital audit in May 2022.
- Collaboration across various Professional Services teams to ensure the University's approach to the disclosure of upheld harassment cases to Wellcome Trust (as per a Wellcome Trust requirement) is compliant with Data Protection legislation. A working group was established which carried out a Legitimate Interest Test and determined that the university does have a legal basis to disclose this information.

20.2. After Jisc announced the retirement of their Research Repository Service early this year, work has also taken place to identify possible alternatives for a University research data repository. Planning for procurement of a new data repository system has now commenced with the aim to have a replacement in place by the end of 2023.

21. <u>External engagement and sharing best practice</u>

21.1. 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 UKRIO and the Russell Group Research Integrity Forum and a member of RIGE was invited to deliver a talk to UKRIO subscribers on the University's Research Integrity Lead system as part of the 2022 UKRIO Annual Conference. The University also ensures RIGE attendance at meetings of the Association of University Sponsors wherever possible.

21.2. The University has also continued (whether on its own, or as part of a wider group of representatives) to engage with and/or provide feedback on UK-wide initiatives and proposed research integrity-related guidance and/or policy. Specific examples include:

- Providing input into, and acting as a reviewer for, UKRIO's [Good Practice in Research: Research Integrity Champions, Leads & Advisers](#) guidance document.
- Taking part in the '[Concordats and Agreements Review'](#) commissioned by UUK, UKRI and Wellcome Trust to explore the impact of concordats and agreements on research culture and the research environment. This review was conducted alongside the [UK government's review of research bureaucracy](#) in support of the broader aims of the [UK's Research and Development Roadmap](#). Representatives from Cardiff University conducted an online survey as part of this review and were interviewed to assist with the development of institutional case studies.

- Providing feedback on proposed Export Controls training content for the HE sector, led by Cranfield University and the University of Edinburgh as part of a Research England Development Fund project.

Planned activities

22. The following research integrity activities will be treated as priority areas during the 2022/2023 Academic Year:

- Finalising an institutional Research Integrity Action Plan, based on the outcomes of the Self-Assessment exercise referenced at paragraph 8;
- Introducing a robust, proportionate and practical solution for the ethical review of UG and PGT educational projects involving humans, human data or human tissue, based on the recommendations of the Task and Finish Group referenced at paragraph 10; and
- Further development of the University's governance structures and systems around Trusted Research and internationalisation, including the development of an institutional Export Controls Policy and tools to support compliance in this area.

23. In addition to the priorities above and the work areas and initiatives listed in the *"Actions and Activities"* section, there are several other research integrity-related activities planned to commence and/or conclude during the next Academic Year including:

- a revision of the University's [Research Integrity and Governance Code of Practice](#) (the University's framework for good research practice); and
- confirming the 'open research' and 'integrity' responsibilities that each School must ensure are addressed. It is anticipated that these responsibilities could be integrated into one or more School research leadership roles and could replace the current 'Research Integrity Lead' role.

Dealing with allegations of Research Misconduct

24. 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.

Allegations against Cardiff University staff

25. 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](#).

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

26.1. 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.

26.2. 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.

26.3. 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.

27. As noted at paragraph 11, the ARM Procedure is currently being reviewed and it is expected that a revised procedure will be published during 2022/2023.

Allegations against students

28. The University takes all allegations of student misconduct during, or relating to, research seriously and has a range of policies and procedures to deal with such allegations. The exact policy and procedure to be applied will depend on the nature of the allegation/the alleged conduct and the level of programme on which the student is enrolled. The most relevant student misconduct policy in this specific context is the University's Academic Integrity Policy, and related Academic Misconduct Procedures. These are all contained within the University's Academic Regulations which are publicly available on the University's website.

29. The University's Academic Integrity Policy sets out the overarching principles of what constitutes Academic Misconduct and confirms that a relevant Academic Misconduct Procedure will be applied to any student alleged to have engaged in such conduct. The relevant procedures referred to are the University's Academic Misconduct Procedure (Research Degrees) and the University's Academic Misconduct Procedure (Taught Students).

30. The University's Academic Misconduct Procedures contain a fair and clear process for considering and investigating Academic Misconduct concerns. In respect of the Academic Misconduct Procedure (Research Degrees) in particular, there are three stages to the procedure as follows:

30.1. Stage 1 (Preliminary Review) - the Director of Postgraduate Research or the Chair of the Awards and Progress Committee (or an appropriate nominee), as applicable, conduct an initial review of the concerns. Depending on when the concerns were raised, the outcome of the Preliminary Review could be to dismiss the concerns, take remedial action or refer the concerns for a Stage 2 investigation.

30.2. Stage 2 (Formal Investigation) - the Head of School appoints a senior member of the school's academic staff to act as an Investigating Officer and to consider the concerns, meet with the relevant parties and produce a report. The Head of School considers the report and all available evidence and determines, on the balance of probabilities, whether Academic Misconduct has occurred. The Head of School may dismiss the concerns if they are unfounded or if there is insufficient evidence that Academic Misconduct has taken place, or they can determine that, on the balance of probabilities, Academic Misconduct has occurred. If it is determined that Academic Misconduct has occurred, the Head of School can refer the case to a Stage 3 Academic Integrity Panel or can determine that, due to the level of seriousness and/or other relevant circumstances, the case does not warrant referral to Stage 3 and that specific remedial action can be taken instead.

30.3. Stage 3 (Academic Integrity Panel) - an Academic Integrity Panel is convened, comprising 3 members of academic staff from outside the School, to consider the case. The panel can dismiss the concerns or determine that, on the balance of probabilities, Academic Misconduct has occurred. If the panel determines that Academic Misconduct has occurred, it can impose one or more of a set of listed actions and sanctions which includes, by way of examples, a written apology, thesis amendment and other formal reprimands including exclusion from the University.

31. The University has a central Student Cases Team that has the following role in relation to Academic Misconduct cases:

31.1. To advise Schools on the steps required under the procedures;

31.2. To convene a panel, and support the panel process (where the earlier investigation determined that a panel was required); and

31.3. To record the outcome of an investigation whatever the outcome (including dismissal of concerns).

Statement on investigations of Research Misconduct

32. During the 2021/2022 Academic Year, three (3) allegations/sets of allegations were received under the University's ARM Procedure (ARM 21.04, ARM 21.05 and ARM 22.01). The decisions in these cases were as follows:

32.1. ARM 21.04 – dismissed at Preliminary Review stage as no evidence of misconduct was provided. The allegation raised related to a difference in opinion regarding the research.

32.2. ARM 21.05 – the Preliminary Review stage identified that there was no evidence of ARM however issues raised were investigated under an alternative University procedure (staff Grievance/Disciplinary Procedure).

32.3. ARM 22.01 - matters raised related to a previous full investigation that concluded in 2012-2013. The review found that the conclusion/action taken at the time was appropriate and no further action was required by the University.

33. During the 2021/2022 Academic Year, the Student Cases Team received one (1) report of an Academic Misconduct investigation in respect of a PGR student (conducted under the University's Academic Misconduct Procedure (Research Degrees)). The investigation related to a matter of authorship and the Academic Misconduct concerns against the PGR student were dismissed following an investigation by the Head of School.

What has the University learned from the investigations?

34. The following lessons have been learnt from the ARM investigations carried out during the 2021/2022 Academic Year:

    34.1. That authorship disputes remain as one of the common areas for ARM-related queries and allegations and frameworks such as CRediT can be useful when addressing such disputes (mainly for science disciplines). It is clear that the University should continue to encourage researchers to consider and document contributor roles at the start of research projects/collaborations (and update as required throughout the project) to avoid issues arising at a later stage.

    34.2. That the revised ARM Procedure should ensure that there are clear links between the Procedure and other relevant University policies/procedures to facilitate referral of an investigation of issues raised to an alternative procedure where appropriate.

35. In respect of student Academic Misconduct cases, the University is continuing to explore ways of improving reporting and identifying common issues arising in a system where the majority of Academic Misconduct cases are investigated and resolved locally. The University is also conducting a piece of work alongside a wider sector group (the Welsh Assessment and Integrity Network) to map how the University fulfils the principles of the QAA Academic Integrity Charter. This work may result in action to improve the promotion of Academic Integrity across the student population and to improve investigation and reporting processes in this area.

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

36. 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.

37. The University will continue to review and monitor its approach in this area and will reflect on its current systems and potential improvements as part of the Self-Assessment exercise referenced at paragraph 8.

Preparation of this Annual Statement

38. Preparation of this Annual Statement was co-ordinated by RIGE. A draft of this statement was endorsed by the University's Executive Board on 11 October 2022 and was approved by ORIEC (subject to some minor amendments and additions) on 20 October 2022.

39. The Annual Statement was also approved by the University's Governance Committee on 10 November 2022 and noted by Council and Senate on 24 November 2022 and 30 November 2022 respectively.

Questions on this Annual Statement

40. Any queries regarding the content of this Annual Statement should be addressed to the University's Research Integrity and Governance Officer (cullene1@cardiff.ac.uk) or the Research Integrity, Governance and Ethics team (resgov@cardiff.ac.uk).

Professor Roger Whitaker
Pro Vice-Chancellor for Research, Innovation and Enterprise
November 2022

Acronym key

AHSS	College of Arts, Humanities and Social Sciences
ARM	Academic Research Misconduct
ASPA	Animal (Scientific Procedures) Act 1986
ASRU	Animals in Science Regulation Unit
BLS	College of Biomedical and Life Sciences
CRediT	Contributor Roles Taxonomy
CTIMP	Clinical Trial of an Investigational Medicinal Product
DORA	Declaration on Research Assessment
DWG	DORA Working Group
GW4	Great Western 4/GW4 Alliance
HEECA	Higher Education Export Controls Association
HTA	Human Tissue Act 2004
HTSC	Human Tissue Standards Committee
MRes	Master of Research
MPhil	Master of Philosophy
NC3Rs	National Centre for the Replacement, Refinement & Reduction of Animals in Research
ORIEC	Open Research Integrity and Ethics Committee
OROG	Open Research Operational Group
PGT	Postgraduate Taught
PSE	College of Physical Sciences and Engineering
PVC	Pro Vice-Chancellor
RCAT	Research Collaboration Advice Team
RCWG	Research Culture Working Group
RGRIF	Russell Group Research Integrity Forum
RIGE	Research Integrity, Governance and Ethics Team
SREC	Schools Research Ethics Committee
UEB	University Executive Board
UG	Undergraduate
UKRI	UK Research and Innovation
UKRIO	UK Research Integrity Office
UKRN	UK Reproducibility Network
UUK	Universities UK