

Cardiff University
Annual Statement on Research Integrity
July 2017

Foreword

1. Integrity is a guiding principle for all activity at Cardiff University (“University”), as set out in the University’s strategy¹. Research is a key strategic focus area for the University, and the University is committed to supporting the highest levels of research integrity and excellence in all research activity. The University is fully committed to upholding the principles of the Universities UK Concordat to Support Research Integrity (“Concordat”).
2. The University has international recognition as a successful research-intensive university. In the 2014 Research Excellence Framework, the University was ranked fifth in the UK for the quality of its research and second nationally for the impact of its research. The University is seeking to enhance its position even further and embraces this challenge within an increasingly competitive international stage.
3. The University’s Research Grants and Contracts income totalled £113.6 million for the 2015/2016 University year, with £57.8 million from Research Councils and Charities. Income from Research Councils and Charities has continued to rise since 2012².

Purpose

4. In order to improve accountability and provide assurances that measures are being taken to support high standards of research integrity, the Concordat recommends that employers of researchers prepare a short annual statement to their governing body, which provides the following:
 - 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, robust and fair, and that they continue to be appropriate to the needs of the organisation; and
 - 4.3. A high-level statement on any formal investigations of research misconduct that have been undertaken.
5. This is the University’s first Annual Statement on Research Integrity (“Annual Statement”) and it has been presented to the University’s Senate, Governance Committee and Council. As recommended by the Concordat, the Annual Statement will be made publicly available on the University’s website.

¹ The Way Forward, 2012-2017

² Further details of the University’s financial performance, including a more detailed breakdown of the Research Grants and Contracts income can be found in the University’s 2016 Annual Review at <http://www.cardiff.ac.uk/about/our-profile/annual-review>

Period covered by this Annual Statement

6. As this is the University's first Annual Statement, it summarises how research integrity is generally managed at the University, as well as addressing the three areas recommended by the Concordat. The "Actions and Activities" section details the key actions taken in 2016/2017 to strengthen research integrity.
7. All future Annual Statements will relate to a specific academic year. The University anticipates that its next Annual Statement will be released in late 2018, to cover the 2017-2018 academic year.

Research integrity at the University

8. The University has a variety of systems and methods in place to support and encourage research integrity across the institution. This Annual Statement summarises the key methods used to strengthen research integrity across the University.

Policy, procedure and guidance

9. In 2015, the University's Research Governance Framework ("RGF") and Academic Research Misconduct ("ARM") procedures were reviewed to ensure that the requirements of the Concordat were being met. The RGF was renamed the Research Integrity and Governance Code of Practice ("CoP"). The CoP and ARM were distributed to all staff in November 2015 and made publicly available on the University website³.
10. The CoP contains a set of expectations and standards for all staff and students involved in research at the University. The CoP makes it clear that staff and students have a responsibility and a duty of accountability to society, their profession, the University and to the funders of research, to accept full responsibility for the professionalism and integrity of all aspects of the conduct and publication of their research.
11. The CoP is relevant to all types of research, at all stages, and also signposts researchers to other relevant University policies and procedures including ARM; Safeguarding Children and Vulnerable Adults; Data Protection; Disclosure of Interests; Open Access Publications.
12. In accordance with the Concordat, the CoP and other policies relating to research activity are subject to periodic review to ensure they remain fit for purpose.
13. The University has specific procedures in place for ensuring that research involving human participants, data or tissue is subject to ethical review and approval. An ethical review route map is available on the University's research ethics webpages setting out when external ethical approvals are required.
14. Save for cases where external ethical approval is required, all research at the University involving human participants, data or tissue is subject to discipline-specific project reviews, conducted by School Research Ethics Committees ("SRECs"). The work of SRECs is overseen by the University Research Integrity and Ethics Committee ("URIEC"), previously known as the University Research Ethics Committee ("UREC").
15. The "Research Support" section of the University's intranet provides researchers with guidance on a variety of research integrity related issues including Research Ethics; The Human Tissue Act

³ <http://www.cardiff.ac.uk/research/our-research-environment/integrity-and-ethics>
<http://www.cardiff.ac.uk/public-information/policies-and-procedures/academic-research-misconduct>

and research involving Human Tissue; research involving the NHS or Clinical Trials of Investigational Medicinal Products (“CTIMPs”); Data Management; Intellectual Property.

16. The research integrity content on the University’s internet and intranet pages is regularly reviewed and updated.

Training

17. Training on research integrity related topics is available through the University’s HR Staff Development Programme/Cardiff Researcher Programme and the Doctoral Academy (for Postgraduate Researchers). Examples include: Managing Research Data; Child Protection; Intellectual Property; Research Ethics; Managing Research Projects. Discipline-specific training is provided in some key areas, such as Clinical Research; CTIMPs; Human Tissue; Animal Research.
18. The Research Governance team delivers a short presentation on research integrity at postgraduate (research) induction and academic orientation (for staff). A scoping exercise is underway for developing a Cardiff University research integrity training programme.

Leadership and responsibility

19. The Pro Vice Chancellor (“PVC”) for Research, Innovation and Enterprise is the senior academic lead for research integrity at the University. The PVC is chair of URIEC. The University’s Deans of Research are members of URIEC and are actively involved in strengthening research integrity. The involvement of senior academics to support and champion research integrity helps to build a culture of research integrity across the University.
20. URIEC is responsible for maintaining and reviewing the CoP, as well as overseeing compliance with the Concordat. As detailed below, URIEC reports to the University’s Governance Committee
21. In January 2017, the University appointed a Research Integrity and Governance Officer (“RIGO”) to support the Research Governance team based in Research and Innovation Services (“RIS”). The RIGO provides dedicated support for the University’s research integrity activity.
22. The RIGO, and other members of the Research Governance team, are officers to URIEC and assist URIEC with implementation of agreed actions. The Deputy Director of RIS/Head of Research Governance and Contracts, is Secretary to URIEC and manages the agenda and minutes for each meeting.
23. The key regulated areas of Human Tissue, CTIMPs and Animal Research are overseen by specific committees which ensure appropriate dissemination of related policies, procedures and guidance. These committees report to URIEC.

Collaboration and external engagement

24. Research integrity is supported across the University. RIS works closely with Academic Colleges and Schools and relevant areas of Professional Services to ensure that policies and guidance are fit for purpose. This co-operation is key to strengthening research integrity across the University.
25. The University values the opportunity to share best practice in research integrity with other institutions across the UK. The University is a subscriber to the UK Research Integrity Office (“UKRIO”) and attends the UKRIO annual conferences. Cardiff University is part of the Russell Group’s Research Integrity Forum and is represented at research integrity workshops. Both of

these forums encourage discussion around research integrity issues and provide the University with an opportunity to share (and learn) best practice.

Monitoring and audit of research integrity

26. The UKRIO Self-assessment Tool has been utilised to benchmark the University's performance against the requirements of the Concordat. This exercise has provided the University with assurance that it is taking many of the suggested and necessary steps to support and encourage research integrity across the institution. In addition, it has enabled the University to identify specific areas where improvements could be made to further strengthen research integrity. These areas have been flagged as action points for designated teams/individuals.
27. As part of the University's annual internal audit plan, two internal audits were conducted (in 2014 and 2016) to assess the University's observance to the Concordat. Both audits were conducted by the University's Joint Internal Audit Unit and, together with the UKRIO Self-assessment Tool exercise, have allowed the University to identify certain actions to further strengthen research integrity.
28. As mentioned above, the ethical review procedures at the University are overseen by URIEC. All SRECs are required to provide an annual report on research ethics activity to URIEC.
29. The Research Governance team in RIS has implemented a risk assessment process for projects under the remit of the Research Governance Framework for Health and Social Care. The assessment defines levels of risk and enables identification of projects which require additional monitoring provisions. CTIMPs have specific trial risk assessments which are maintained throughout the trial and which are used to define monitoring requirements. The University's Human Tissue Manager and supporting team undertake a comprehensive audit programme that covers all human tissue held under the University's licence. Human Tissue Act internal audits are also carried out on licence-exempt studies. A separate monitoring/audit programme is in place for animal research and is overseen by the College of Biomedical and Life Sciences.

Actions and activities (2016/2017)

30. Research integrity has continued to be a key focus area for the University during 2016/2017. The key activity during this period includes:
 31. The establishment of URIEC
 - 31.1. In April 2016, the establishment of URIEC was approved by the University's Governance Committee, to come into effect from August 2016. As referenced above, URIEC evolved from, and includes the business of, UREC.
 - 31.2. The terms of reference for URIEC are wide ranging and include:
 - 31.2.1. Acting as an oversight body to ensure that the University meets the requirements of the Concordat;
 - 31.2.2. Maintaining and reviewing the CoP;
 - 31.2.3. Monitoring compliance with legislative requirements by receiving (at each meeting) a report from the Biological Standards Committee (in respect of animal research), the Human Tissue Standards Committee and the Clinical Trials (of Investigational Medicinal Products) Governance Group;

- 31.2.4. Oversight of the ethical review procedures at the University (a role previously undertaken by UREC), which includes receipt of an Annual Report from each SREC; and
- 31.2.5. Receiving reports on allegations of ARM.
- 31.3. URIEC will meet four times a year and report to the Governance Committee. The preparation of this Annual Statement is a requirement of URIEC's terms of reference.
- 31.4. URIEC met for the first time in November 2016. Subsequent meetings were held in January 2017, April 2017 and June 2017. The current priority areas for URIEC include:
- 31.4.1. *Research integrity training*
A project is currently underway to scope the development of specific research integrity training for researchers at the University. Consideration is being given to developing a University online training module, alongside other training options.
- 31.4.2. *Identification of high risk research projects*
Criteria is being developed to help identify high risk University research projects. Subsequently, a system will need to be implemented to identify any such research projects and to determine levels of project monitoring.
- 31.4.3. *The "Prevent Duty" and Security Sensitive Research*
Consideration is being given to the systems the University can, or should, implement to ensure compliance with the Prevent Duty and for monitoring Security Sensitive Research.
- 31.5. Since its establishment, URIEC has received reports from the Biological Standards Committee (in respect of animal research), the Human Tissue Standards Committee and the Clinical Trials (of Investigational Medicinal Products) Governance Group, as planned. A report on allegations of academic research misconduct and adverse events in human tissue research have also been received.
- 31.6. Other key activities undertaken by URIEC since its establishment have included:
- 31.6.1. Approving revisions to the CoP, including the addition/updating of sections on Export Controls and Bribery. The updated CoP will be published by the end of the 2016/2017 academic year; and
- 31.6.2. Hearing an appeal against a decision made by an SREC.

32. Update to Annual Report from SRECs – the Prevent Duty

The University has implemented an update to the 2017 School Ethics Annual Report proforma (that all Schools complete and submit to URIEC) to specifically address the Prevent Duty. As part of the update, researchers are asked to confirm that due regard has been given to the Prevent Duty and weblinks are included on the proforma for further information on the Prevent Duty.

33. Appointment of the Research Integrity and Governance Officer

The RIGO commenced employment with the University in January 2017 and this post is part of the Research Governance team within RIS. The RIGO has been working with key individuals across the University (and with staff at other UK universities) to develop

initiatives that will strengthen research integrity at Cardiff University. The RIGO is an officer of URIEC and has taken the lead on a number of the priority areas for URIEC, including the development of research integrity training.

34. Mapping research integrity policy/guidance across the University

An exercise has commenced to centrally co-ordinate all University policies and guidance that fall under the umbrella of research integrity. As part of this exercise, a review will take place to ensure that responsibilities are clear and that the documents align and are complementary. The information collated could assist in future decision-making around research integrity activity and may identify further areas to assess.

35. Safeguarding children and vulnerable adults in research

Members of RIS, including the RIGO, have fed into the development of a new University safeguarding policy, which should be published shortly. This will include specific guidance to researchers to help ensure legal compliance.

36. Discussions with GW4 counter-parts

Discussions are ongoing between the University's RIGO and appropriate counter-parts from GW4 institutions⁴ regarding the possibility of collaborating on a future research integrity initiative.

37. Communication and raising awareness

37.1. Members of the Research Governance team attended "Speak Week" events at the University in February 2017. The purpose of these events were to raise the profile of the employee voice at the University and encourage staff to share their views. Staff were given an opportunity to learn about the work of RIS and ask questions about research governance and integrity.

37.2. During 2016/2017, the Research Governance team has presented at PhD students and research staff inductions regarding research integrity at the University.

37.3. In March 2017, an article on research integrity was included in "Blas" which is the University's staff newsletter.

Academic Research Misconduct Procedure

38. The University takes seriously any allegation of research misconduct and has produced a procedure to deal with such allegations in line with the principles of the Concordat and guidance issued by UKRIO.

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

39.1. A Preliminary Stage where the Named Person, in consultation with the Pro Vice-Chancellor Research and normally within 20 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.

⁴ GW4 is an alliance which combines the intellectual capacity and physical resources of the four leading research-intensive universities in the South West of England and Wales: Bath, Bristol, Cardiff and Exeter.

- 39.2. A Screening Stage where, normally within 30 days, a Panel of three internal members of staff would consider all relevant material relating to the allegation supplied by the Complainant and the Respondent and seek further clarification if required.
- 39.3. A Formal Investigation Stage. 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.
40. The ARM Procedure was last reviewed and revised in 2015. This revision arose from experience in dealing with allegations received since 2010, advice received from UKRIO and the issue of the Concordat. The revised ARM Procedure was approved by the University's Senate and endorsed by the Governance Committee.
41. In keeping the ARM Procedure under regular review and obtaining feedback from UKRIO, the University ensures that its ARM Procedure remains fit for purpose, complies with best practice and is robust and fair.

Statement on formal investigations of Academic Research Misconduct

42. During the 2016/17 academic year to date, three allegations have been received under the University's ARM Procedure. Of these allegations:
- 42.1. Two were dismissed at the preliminary stage; and
- 42.2. One case is still being considered

Preparation of this statement

43. This statement was prepared and coordinated by the Research Governance team, RIS, with specific input from Strategic Planning and Governance (responsible for the Academic Research Misconduct Procedure). A draft of the statement has been reviewed and commented on by URIEC.
44. The statement was presented and discussed at a meeting of the University's Senate on 14 June 2017, the Governance Committee on 21 June 2017 and Council on 10 July 2017. Changes suggested at these meetings have been incorporated into the final version of this Annual Statement.

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July 2017