Annual Statement on Research Integrity

November 2018

Foreword

1. Cardiff University has international recognition as a successful research-intensive university, confirmed by the achievement of a top five position in the 2014 Research Excellence Framework.

2. Cardiff University is committed to upholding the principles of the Universities UK 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

3. 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:

   3.1. A summary of actions and activities undertaken to support and strengthen understanding and application of research integrity issues;

   3.2. 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

   3.3. A high-level statement on any formal investigations of research misconduct that have been undertaken.

4. This is the University's second Annual Statement on Research Integrity (Annual Statement) and has been prepared for the University's governing body (its 'Council') as recommended by the Concordat. This Annual Statement will be made publicly available on the University's website.

Period covered by this Annual Statement

5. This Annual Statement summarises the actions and activities undertaken during the 2017/2018 Academic Year to strengthen research integrity. It also provides the required assurances and statements on research misconduct for the same time period.

6. 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[1].

Actions and activities (2017/2018)

7. Research integrity has continued to be a key focus area for the University during the 2017/2018 Academic Year, with the introduction of new initiatives designed to strengthen and embed research integrity across the institution. Key activity during this period is set out below.

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[1] https://www.cardiff.ac.uk/research/our-research-environment/integrity-and-ethics/research-integrity-and-governance

8. Annual Review of Research Integrity and Governance Code of Practice ('CoP')

8.1. The CoP comprises the University's framework for the responsible conduct of research; it applies to all researchers, in all disciplines. Responsibility for maintaining the CoP and for reviewing its effectiveness lies with the University Research Integrity and Ethics Committee (URIEC) but responsibility for co-ordinating the review is discharged to the University's Research Governance Team (Research and Innovation Services (RIS)). As recommended by the Concordat, the CoP is subject to periodic review to ensure it remains fit for purpose; this activity currently takes place annually.

8.2. The 2017/2018 annual review exercise resulted in the preparation of a revised CoP. The revisions were as a result of updated University policies, external professional frameworks, and feedback obtained from the University's Professional Services teams, Research Integrity Leads and URIEC Members and Officers.

8.3. The revisions include a general re-structure and improved signposting to other sources, alongside changes to specific section content, including (but not limited to):

8.3.1. Data Protection
References to the Data Protection Act 1998 have been replaced with 'Data Protection legislation' to capture the new General Data Protection Regulation (GDPR) and UK Data Protection Act 2018. Data Protection content has been updated throughout the CoP to reflect the changing legislative landscape. The University has also developed specific guidance for researchers on how to apply the GDPR and how it impacts on research activity.

8.3.2. Authorship
Updates have been made to reflect best practice in determining authorship and avoiding authorship disputes. In particular, the CoP now encourages researchers to identify the relevant authorship criteria and to agree who will be listed as an author at an early stage, to document this, and to keep the matter under regular review.

8.3.3. Conflicts of Interest
The CoP now contains a declaration process for student researchers; allowing them to declare conflicts of interest relating to their research. Previously, the CoP only contained a process for staff researchers.

8.4. A number of new sections have been added to the CoP, including (but not limited to):

8.4.1. Research Integrity Online Training Programme
Researchers are encouraged to complete the University's new online training programme; launched at the start of the 2017/2018 Academic Year. Completion of this training programme is mandatory for certain categories of staff and student, as explained further in Paragraph 9 below.

8.4.2. Security-sensitive Research
Researchers are reminded of the University's obligations as a result of the 'Prevent Duty' and how this duty could be triggered by research activity. Researchers are signposted to the University's Policy on Security-sensitive Research; introduced in April 2018. This Policy comprises a framework for the responsible management of research falling within scope of the Prevent Duty (see Paragraph 12 below).

8.4.3. Research Misconduct
Researchers are signposted to the University's policies and procedures on Research Misconduct and reminded that the University is committed to treating all allegations of research misconduct seriously.

8.4.4. Registration of Clinical Research on Publicly Accessible Databases
Researchers are reminded that it is good practice for all Clinical Research projects to be registered in a publicly-accessible database and, in certain cases, particularly involving Clinical Trials, it is a condition of a favourable ethical opinion to do so.

9. Introduction of Research Integrity Online Training Programme

9.1. At the start of the 2017/2018 Academic Year, the University launched a new online training programme designed to help researchers to understand their responsibilities and ensure that research is conducted to the highest professional standards. The training was developed in-house by the University's Research Integrity and Governance Officer (RIGO), with input from various Professional Services teams across the University and Members and Officers of URIEC. The training covers a range of research integrity topics including: research ethics; research misconduct; authorship and publication practice; conflicts of interest and data management.

9.2. Completion of the training is mandatory for certain staff and student groups and is highly recommended for anyone else involved in research at the University. Whilst the groups for which the training is mandatory is under review, for the 2017/2018 Academic Year completion of the training was mandatory for all new staff joining the University on a Research, or Teaching and Research, contract and for all new postgraduate research students.

10. Establishing a network of 'Research Integrity Leads'

10.1. Since the start of the 2017/2018 Academic Year, the University has designated an individual in each Academic School (and one individual at College-level) to act as a Research Integrity Lead (RI Lead). These individuals comprise a network of RI Leads who support the work of URIEC and help to strengthen and embed research integrity across the University.

10.2. The RI Leads facilitate and promote research integrity initiatives and contribute to the identification and development of new initiatives. Since the RI Lead initiative was launched, the leads have been involved in a range of activities, including:

10.2.1. Attendance at bespoke seminars on research integrity;
10.2.2. Providing feedback on proposed revisions to the CoP and on the University's approach to research ethics review (to help inform a future review of the University's Research Ethics Procedures);
10.2.3. Engaging with the University's RIGO in respect of research integrity queries arising within the School/College;
10.2.4. Local communication/dissemination of research integrity information; and
10.2.5. Providing feedback on the RI Lead role description (with a view to revising the role description for the 2018/2019 Academic Year).

10.3. Since the RI Lead initiative was launched, there has been an increase in dialogue between those designated as RI Leads and the RIGO and the RI Leads are now an effective network

for the sharing of best practice. The initiative has helped to promote research integrity across all disciplines, and has assisted with the implementation of research integrity policies and training locally. All of these are positive steps towards embedding a culture of research integrity across the institution and it is anticipated that the introduction of RI Leads as 'named points of contact' for research integrity queries in the future will further strengthen a culture of research integrity.

11.   Introduction of Security-sensitive Research (SSR) Policy

11.1. In April 2018, the University launched a new SSR Policy which comprises a framework for the registration and responsible management of SSR conducted at Cardiff University. The SSR Policy applies to research falling within the scope of the 'Prevent Duty'.

11.2. The purpose of the SSR Policy is to ensure that SSR is conducted safely and responsibly and that the University is taking appropriate steps to help safeguard its researchers (and the wider staff and student community) against the risk of radicalisation and/or the risk that SSR activity might result in a misinterpretation of intent by external authorities.

11.3. In accordance with the new policy, researchers are responsible for identifying whether the research they are conducting could be regarded as SSR. If so, they must complete a SSR Registration Form and submit this to RIS (using a dedicated email address set up for SSR registrations) before the research commences. The SSR Registration Form requires researchers to provide certain assurances in the areas of ethical review, data and information security and safeguarding. Once a completed SSR Registration Form is received, the research is registered by RIS on a SSR Register.

11.4. Oversight of the SSR Policy is the responsibility of URIEC, which will receive reports from RIS on all SSR registered under the policy. Information entered on the SSR Register will be shared with the University's Prevent Strategy Group, where required.

12.   External engagement and sharing best practice

12.1. During the 2017/2018 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's RIGO continues to be an active member of the Russell Group Research Integrity Forum (RGRIF) and provides feedback from RGRIF events to the wider Research Governance Team and URIEC.

12.2. During the 2017/2018 Academic Year, the University has contributed to various Russell Group initiatives and publications in the area of research integrity including: feeding into the Russell Group response to the Science and Technology Committee's Research Integrity Inquiry; and providing feedback on, and adopting, the Russell Group Statement of Cooperation in respect of cross-institutional research misconduct allegations.

12.3. The University continues to subscribe to the UK Research Integrity Office (UKRIO) and attended the 2018 UKRIO Annual Conference. The University is also working with UKRIO on the development of a practice note for research organisations on the adoption of research integrity leads/champions as a way of embedding research integrity across an organisation. The University is sharing its experience of adopting a research integrity lead model with UKRIO in order to benefit other research organisations and open up dialogue on how such an initiative can be further improved.

Planned activities

13.   In addition to the activities conducted during the 2017/2018 Academic Year, there are a number of research integrity activities planned for the next Academic Year (for which initial steps have already been taken by RIS and/or URIEC) including:

    13.1. Review of the University's Research Ethics Procedures
    The University has embarked on a review of its Research Ethics Procedures for research involving human participants, human material or human data. The review exercise will require RIS and URIEC to engage with key stakeholders across the University to explore if, and how, the University's procedures can be improved to help researchers meet the highest ethical standards.

    13.2. Development of Image Integrity Guidance
    The University is in the process of developing guidance for its researchers on Image Integrity. The guidance will aim to promote good conduct in image publication and help to prevent inappropriate image manipulation.

Academic Research Misconduct Procedure (ARM Procedure)

14.   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.

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

    15.1. 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.

    15.2. 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 shall lodge it with the Named Person.

    15.3. 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.

16.   A 'light touch' review of the ARM Procedure has been carried out during the 2017/2018 Academic Year in order for the University to update the procedure in line with RCUK's updated Policy and Guidance on Good Research Conduct, RCUK's Grant Terms and Conditions and data protection legislation.

17.   A working group will be established in the 2018/2019 Academic Year to carry out a full review of the ARM Procedure to ensure that experience of dealing with allegations continues to inform the procedure, that it remains fit for purpose, complies with best practice and is robust and

fair. The revised ARM Procedure will be submitted to the University Research Integrity and Ethics Committee, the University's Senate and the University's Governance Committee for agreement.

Statement on formal investigations of Academic Research Misconduct

18.   During the 2017/2018 Academic Year, six allegations/sets of allegations have been received under the University's ARM Procedure. Of these allegations:

   18.1. Three were dismissed at the preliminary stage;

   18.2. Two were investigated under the formal investigation stage. The investigation found, in light of the evidence presented, that the allegations of Academic Research Misconduct had not been substantiated; and

   18.3. One case is still being considered.

Preparation of this Annual Statement

19.   This Annual Statement was prepared by the University's Research Governance Team, Research and Innovation Services, and the University's Assurance Services Team, Strategic Planning and Governance. A draft of the statement was first presented to URIEC for comment and consideration. The Annual Statement was approved by URIEC on 09 October 2018.

20.   The Annual Statement was presented at further meetings of the University's Senate on 31 October 2018 and Governance Committee on 01 November 2018 before proceeding to Council for approval on 26 November 2018. Changes suggested at these meetings have been incorporated into the final version of this Annual Statement.

Professor Kim Graham
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November 2018

Acronym key

ARM	Academic Research Misconduct
CoP	Research Integrity and Governance Code of Practice
GDPR	General Data Protection Regulation
RGRIF	Russell Group Research Integrity Forum
RIGO	Research Integrity and Governance Officer
RI Lead	Research Integrity Lead
RIS	Research and Innovation Services
SSR	Security-sensitive Research
UKRIO	UK Research Integrity Office
URIEC	University Research Integrity and Ethics Committee