Annual Statement on Research Integrity 2021/22

Background

In October 2019, Universities UK published the revised Concordat to Support Research Integrity, a comprehensive national framework for good research conduct and its governance. UKRI, NIHR and the Wellcome Trust are included among its signatories. The Concordat applies to all those engaged in research.

The Concordat requires in particular that the University should present a short annual statement to its governing body that:

- Provides a summary of actions and activities that have been undertaken to support and strengthen understanding and application of research integrity issues;
- Provides assurances that the processes they have 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;
- Provides a high level statement on any formal investigations of research misconduct that have been undertaken, and lessons learned from these;
- Provides detail as to how the institution creates and embeds a research environment in which all staff, researchers and students feel comfortable to report instances of misconduct.

To improve accountability, and provide assurances that measures being taken continue to support consistently high standards of research integrity, the statement must be made publicly available.

The University's Statements are published at:

https://www.york.ac.uk/staff/research/governance/research-integrity-and-ethics/.

Statement for 2021/22

1. During 2021/22, the University has undertaken the following actions and activities to support and strengthen understanding and application of research integrity issues:

   (a) Revisions to the Code of Practice on Research Integrity were approved by University Research Committee (URC) and Senate. Changes have been made to ensure alignment with the Concordat to Support Research Integrity and to articulate more clearly the role of the University and researchers. An accompanying User's Guide, outlining the core principles and requirements of the Code, was in development and would be made available in due course.

   (b) Similarly to the above, the Code of Practice and Principles for Good Ethical Governance had been considered and approved by URC and Senate. Key changes included the use of 'Local Research Ethics Committee' (rather than 'Departmental/Subject') to better reflect the structure at the University, as well as

further consideration of Freedom of Speech. A User's Guide would also accompany this Code.

(c) Following the disbandment of the Ethics Framework Governance Committee (EFGC), work was underway to identify escalation procedures for the onward referral of ethics questions. A review of procedures for the management of research related to Prevent was also in train. The Terms of Reference for the Academic Ethics and Compliance Committee (AECC) were under review to ensure they appropriately reflected the ethics governance structure at the University.

(d) Work was underway to establish a Professional Services Ethics Committee, in order to ensure that research projects taking place within professional services are subject to appropriate oversight. A Chair had been appointed, and the Committee would soon become operational. The Committee would be serviced by the Policy, Integrity and Performance Officer for Ethics, and would feed into the AECC.

(e) A review of the Research Misconduct Policy and Procedure had been initiated, with the Policy, Integrity and Performance (PIP) team working with HR to identify gaps in the current policy and mitigate outstanding risks. The University submitted a response to the UKRIO Consultation on their Draft Procedure for the Investigation of Allegations of Research Misconduct; this and other UKRIO resources would be referred to throughout the University review process.

(f) The online Research Integrity Tutorial (RIT) is under review by colleagues from PIP and the Academic Support Office (ASO). The review had ensured the training material was fit for purpose and appropriate for its intended audience. Following the release of UKRIO guidance on Research Integrity Training, an in-depth review would be conducted, potentially resulting in more significant changes to the content and structure of the online training module.

(g) Work continued to strengthen due diligence procedures, including the development of 'Know Your Partner' guidance and a Heightened Risk Procedure. The University Audit and Risk Committee had commissioned an audit of due diligence procedures at the University, encompassing research partnerships.

(h) The PIP Team had been working to develop a series of webpages outlining the requirements of export control legislation. These would cover the core components of export controls with which researchers must comply, as well as signposting University resources.

(i) Following on from 2020/21, the University Policy on the Payment of Individuals for Involvement with or Contribution to Research had been approved and made available on the research policy webpages. The PIP team was working with Involvement@York

to develop a simplified version of the policy which would be more accessible for members of the public.

In line with the requirements of the policy, a brief summary of payments made to individuals for involvement with or contribution to research was presented to the URC following the end of the 2021/22 financial year. One individual was highlighted as having received in excess of £1,000; the Department and individual in question were notified and the situation was now in hand.

(j) In November 2021, the Institutional Statement on Responsible Research and Innovation (RRI) was approved by the URC. The Statement confirms the dedication of the University to ongoing reflection, providing a framework through which researchers can consider and develop RRI statements specific to their areas of work. The Institutional Statement also reaffirms the strategic commitments of York as a University for Public Good. The development of the Institutional Statement was informed by various events held across the University on the topic.

(k) Colleagues across the institution were working to strengthen support for research culture, led by the Research Innovation and Development Team. The University had received funding from Research England for supporting research culture, which had been allocated to a variety of projects across the institution, for example the work of the Open Research team (see (m), below).

(l) A review of the PIP team has been conducted with the support of external consultants from SEA Consulting. The aim of the review has been to identify obstacles, opportunities and gaps in current provision, with the goal of strengthening further the support offered by the team. This had involved a team focus group and a series of one-to-one meetings with key stakeholders. The report had found that the PIP team was effective and knowledgeable. A series of recommendations would be enacted, including the development of a team plan, to further strengthen oversight of integrity and compliance.

(m) The Data Protection Team had worked with chairs of local ethics committees to optimise the effectiveness of template privacy information materials, to improve the readability of such resources for research participants.

(n) The Data Protection Impact Assessment process had been automised to assist academic staff and students in screening projects against the requirements and completing assessments where required.

(o) Work continued to support Open Research practices at the University. A skills framework was to be developed, which would map existing training available within the University for open research practices, as well as identify gaps in current provision. Importantly, this framework would be designed to encompass all subject

disciplines at York, with the aim of highlighting both similarities and differences in disciplinary approaches. A short-term Project Coordinator would be recruited through the Student Internship Bureau to help deliver this framework in partnership with the University Library.

The Open Research and Content team continued to develop resources to support open research at the University. An initial set of Open Research in Practice Case Studies have been published to help promote good practice across disciplines. The Open Research Advocates network remained active, and had recruited new members from across all three Faculties.

A second York Open Research Awards scheme is currently underway, supported this year by Research England funding to enhance research culture. A wide variety of projects were awarded last year, and two researcher-led initiatives, ReproducibiliTea York and Open Autism Research, received additional development funding. Further online events have been organised including 'How you can shape social science research' on public co-production in research as part of the ESRC Festival of Social Science (Nov 2021), and several events in collaboration with White Rose Libraries partners for International Open Access Week (Oct 2021). Both the award scheme and the skills framework were funded via the UKRI Enhancing Research Culture scheme.

(p) An increased focus on open access publication amongst 'cOAlition S' funders worldwide had meant a shift from paywalled to open access for scholarly publication, and in recognition of this the University had continued to strengthen its approach to this area. The Library had played an active role in securing new open access publishing deals for the UK HE sector; most significantly with Elsevier, the world's largest academic journal publisher. The Library would also lead on work to review the University's own open access policy and ensure alignment with funder policies. The Open Research Strategy Group remained active and advised on this policy work, and had instigated some parallel work on the ethical implementation of open access.

(q) The webpage for Research Data York had been revised in order to ensure clarity and accuracy. This had involved clarifying the conditions that need to be met by research staff and postgraduates in order to deposit data, most prominently that the data is sufficiently anonymised. Further [information](#) had been provided regarding the handling of restricted access data sets.

(r) The University remained an active participant in sector-wide efforts for the strengthening of research integrity. York is a member of the Russell Group Research Integrity Forum and the North East Ethics and Integrity Group, and as part of these groups works to establish and share good practice relating to research integrity.

(s) Work continued to implement measures in support of a robust research culture. A Research Culture Working Group (RCWG) had been established to provide direction

and oversight for activities related to research culture, including overseeing the creation, implementation and monitoring of a new University of York Research Culture Action Plan. The PIP team was to conduct a review of REF Environment Statements to identify current provision and areas of good practice.

(t) The University had received funding from Research England for projects developed to enhance research culture. This included work within the new School of Arts and Creative Technologies, support for ECRs (through a range of projects in Biology, Mathematics and Language & Linguistic Science), and a focus on career progression (Health Sciences, Chemistry). Some of this funding had also been used for Open Research initiatives (see (m), above).

(u) Training and support additional to the University's core provision has been offered as follows:

   i. The Data Protection team had produced various [training materials](#) in 2021/22 to better support researchers and Chairs of local ethics committees.

   ii. The PIP team spoke to attendees of the University 'Fellowship Fortnight' via Zoom as part of the 'Preparing for Fellowship Success' (PfFS) training programme. The talk built upon attendees prior knowledge of research integrity and ethics, discussing in greater depth the risks generated by research and how these might be mitigated. This included issues which had been subject to greater government focus, such as the Trusted Research agenda and Export Controls.

   iii. The PIP team had spoken to colleagues at the York Research Administrators Forum (YRAF) about policy developments throughout the year, including updates to due diligence requirements, Trusted Research and the research payments policy.

   iv. A Research Integrity Forum on the topic of Trusted Research was under development.

2. Processes for dealing with academic misconduct:

(a) The University is committed to investigating all allegations of misconduct in a robust, fair and timely manner. Our Research Misconduct Policy and Procedure (RMP&P), available on the University webpages, outlines how any investigations will be carried out with consideration for the well-being of all parties.

(b) A review of the RMP&P is currently underway, informed by the UKRIO example Procedure for the Investigation of Misconduct in Research. This involved assessing the suitability of the RMP&P against the requirements of the Concordat to Support

Research Integrity. The University had also fed into the UKRIO consultation on their draft Procedure for the Investigation of Misconduct in Research.

(c) As part of the RMP&P review, the current routes for handling academic and research misconduct had been mapped out to clarify the process and referral points to related procedures (such as the Disciplinary Process and the Capability Procedure).

(d) Alongside the above, work was underway in response to OiA feedback to improve support mechanisms for those subject to a research misconduct investigation, for example the inclusion of an appeals process in the RMP&P.

3. Statement on formal investigations of research misconduct and lessons learnt:

(a) During 2021/22, we have investigated an allegation concerning the conducting of research without appropriate ethical review. In this case, an individual's application to participate in a research project had been declined, however they subsequently contributed to the data analysis of the research undertaken by another institution. The data analysis involvement took place a few years following the denial of ethics approval. Over the course of the investigation, it was concluded that the individual had erroneously recalled the detail of the initial ruling and it was recommended they apologise and commit to full compliance in the future. This decision took several mitigating factors into account. The formal apology was received.

The investigation recommended that the decision-making and escalation processes be reviewed in order to identify potential improvements. This review would commence shortly.

(b) An allegation of bullying and harassment was received in March 2021, and was reported to the Wellcome Trust at the start of the investigation, in line with their policy. There was no case found and nothing further to report.

(c) Two further allegations of bullying and harassment were reported to the University over 2021/22, both concerning members of staff. In both cases the relevant funder has been informed and an investigation is ongoing.

(d) The University was also made aware of a case involving a researcher who had previously been employed at York, but was now working in the private sector abroad. The case concerned an allegation of improper authorship citation whilst the individual was employed at an institution in North America. Following consultation with UKRIO, it was determined that the University of York had no responsibility or remit for investigating the case, and the previous employer - from whom the allegation had been raised - was informed of this.

(e) The University is committed to learning lessons from instances of misconduct. As mentioned above, we have initiated a review of the decision-making and escalation processes in the relevant department (3(a)). This review will be led by the PIP team.

A priority in the review of the Research Misconduct Policy and Procedure is the clarification of requirements for research-related work. This is intended to resolve the issue of cases of potential research misconduct committed as part of projects which are not classed as research misconduct according to the Frascati definition, for example consultancy. This will strengthen the institutional procedures and policies governing the area.

Common issues arising in misconduct cases are noted and will be used to inform the review of our online Research Integrity Tutorial (RIT).

4. Statement on the fostering of a supportive research environment in which all staff, researchers and students feel comfortable to report instances of misconduct:

The University of York is committed to fostering a supportive research environment in which all staff, researchers and students feel comfortable to report instances of misconduct, and we work towards this in a number of ways. We are driven by a recognition that a culture of integrity is supported and maintained by a transparent environment in which mistakes can be addressed openly.

The Research Contingency Group established during the COVID-19 pandemic had been retained, and was now named Research Operations Coordination Group (ROCG). Academics and staff from professional services remained involved, ensuring a wide range of stakeholders were included.

Our Code of Practice on Research Integrity specifies that "each member of the University community has a responsibility to foster an environment which promotes intellectual honesty and integrity", and that to support this, the University will "protect the interests of those who draw attention to possible misconduct in good faith" (7.2). The Code of Practice also refers to the UKRIO Guidance for Researchers on Retractions in Academic Journals (2010), which states that 'an admission of honest errors in research should in no way be construed as misconduct; on the contrary, the reporting of genuine mistakes is in accordance with good practice in research'. This no-detriment approach is key to the stance of York and is seen in other policies governing research, including our Statement on Safeguarding in Research, and our Research Misconduct Policy and Procedure. The latter also makes specific provision for the consideration of equality and diversity, to ensure such allegations are handled in a sensitive and fair manner, as well as specifying that no individual involved in the investigation will be sanctioned without an allegation being upheld.

Our Research Integrity Forums provide a venue for researchers and professional services staff to gather and discuss new or complex areas of research integrity and ethics. Some examples of these Forums, which have been reported in previous Statements on Research

Integrity, are events focusing on the use of social media in research, incidental findings, and authorship. Such events are important in offering the opportunity for researchers to raise and address areas of uncertainty, as well as helping to develop an atmosphere in which integrity issues are prevented and discussed early on in the process, as opposed to simply addressing them only when they arise. Although these Forums have been deprioritised during the pandemic, the PIP team is in the process of planning an event to take place over summer on the topic of Trusted Research.

We are dedicated to supporting a research culture which encourages and enables honest, in-depth discussions on research integrity. The Code of Practice on Research Integrity and the Code of Practice and Principles for Good Ethical Governance have both been updated in the interest of greater clarity and support for researchers. The University is keen to optimise the effectiveness of ethical oversight at York, in the interest of fostering an open environment in which ethics and integrity are embedded in conversations and planning, and discussed within a supportive culture where advice can be sought rather than via formal recourse to misconduct investigations.