

Commitment	How this is fulfilled at the University of York	
<p>Commitment One: We are committed to upholding the highest standards of rigour and integrity in all aspects of research. The definition of research integrity used in this concordat draws on a number of existing definitions in a way that is applicable to all areas of research. The core elements are: (i) honesty (ii) rigour (iii) transparency and open communication (iv) care and respect (v) accountability.</p>		
<p>Researchers are responsible for:</p>	<p>1.1.1. Understanding the expected standards of rigour and integrity relevant to their research.</p>	<p>It is made clear to researchers at York that compliance with the relevant integrity standards is essential when conducting research – for more on how the University supports them in this, see 1.2.2.</p>
	<p>1.1.2. Maintaining the highest standards of rigour and integrity in their work at all times.</p>	<p>For how the University supports researchers in this, see 1.2.2.</p>
<p>Employers of researchers are responsible for:</p>	<p>1.2.1. Maintaining a research environment that develops good research practice and embeds a culture of research integrity, as described in commitments 2 to 5.</p>	<p>The University is committed to fulfilling this. Our Research Strategy (2015-2020) noted integrity as one of the core foundations supporting and driving research at York, noting “We will undertake research in accordance with the highest professional standards (as specified in the University’s Code of Practice on Research Integrity) to ensure that it is robust and accords with rigorous ethical values.”</p>
	<p>1.2.2. Supporting researchers to understand and act according to expected standards, values and behaviours.</p>	<p>Supporting researchers to understand and act in line with expected standards, values and behaviours is key to the mission of York. Section 6 of our Code of Practice on Research Integrity outlines the responsibilities of members of the University community to support researchers in this regard. In particular, section 6.8 notes the responsibility of the University for:</p> <p>“(a) Bringing this code of Practice and the University’s Research Misconduct Policy and Procedure (...) to the attention of all those involved in research, in particular through induction provision for new staff and students. (b) Ensuring that there are adequate provisions made for training and development to enable staff and students undertaking research to attain the skills necessary for their role.”</p> <p>The training we have available to aid this is outlined in 3.2.1. We also have online webpages covering research integrity and ethics, as well as more specific resources on training and support related to integrity and ethics.</p>

	<p>1.2.3. Defending researchers when they live up to the expectations of this concordat in difficult circumstances.</p>	<p>The University is committed to upholding the principle of academic freedom, and enables researchers in the pursuit of knowledge even where this knowledge might be unpopular or controversial. We utilise a strong governance structure and ethical review system to ensure risk is mitigated and the institution is able to defend researchers. We assess research misconduct allegations and cases on an individual basis to ensure fairness and the appropriateness of our response.</p> <p>We are dedicated to providing support for researchers who wish to engage in difficult or challenging research. In November 2019, we held a Research Integrity Forum on the topic of Controversial Research, which explored how researchers might tackle research which was potentially unpopular or difficult, as well as how the University could best support such engagement.</p> <p>The University recognises the importance of protecting whistle-blowers in order to ensure we can effectively defend researchers who live up to the expectations of the concordat in difficult circumstances; for more on how this is achieved, see 4.2.4.</p>
	<p>1.2.4. Demonstrating that they have procedures in place to ensure that research is conducted in accordance with standards of best practice; systems to promote research integrity; and transparent, robust and fair processes to investigate alleged research misconduct.</p>	<p>Where relevant, our research policies are reviewed on a three-yearly cycle to ensure they continue to reflect best practice - see 5.1.3 for more.</p> <p>The University has systems in place to promote research integrity, including the mandatory completion of research integrity training for PGR students in order to progress in their studies. We also prioritise research integrity and ethics training for students and staff, and communicate developments in the area to members of the research community. Regular Research Integrity Forums provide a space for researchers to meet and discuss difficult questions, which is key in prompting discussion amongst the community. In 2019/20, the Terms of Reference for our University Research Committee were updated to include a specific mention of research integrity.</p> <p>For how we ensure our processes for investigating alleged research misconduct remain transparent, robust and fair, see Commitment Four.</p>
<p>Funders of research will...</p>	<p>1.3.1. Publish clear statements of their expectations of researchers</p>	<p>Expectations as regards to research integrity and professionalism are communicated frequently and clearly throughout the research process. Our Code of Practice of</p>

	and employers of researchers with respect to standards of professionalism and integrity.	Research Integrity states that “The University is committed to the highest standards in its research, underpinned by the quality of the research process, from conception through to dissemination and application” (1.1), and also that “This Code of Practice applies to all those undertaking research under the University’s auspices” (1.2). Our Research Integrity and Ethics webpage further emphasises that “The University expects the highest standards in the conduct of all research undertaken in its name and on its premises using its facilities.”
	1.3.2. Take research integrity into account in the development of policies and processes.	The University’s research activity is overseen by the University Research Committee (URC), reporting to the University Senate which oversees all academic activity. Policies and processes relating to research are considered and, where relevant, approved by URC prior to implementation. The Terms of Reference for URC make specific reference to research integrity, noting the responsibility of the committee to “champion and promote research excellence and integrity, and to oversee the development and maintenance of the supporting policy framework, reporting annually to Senate and Council.”
	1.3.3. Encourage adoption of the concordat by associating it with their funding conditions.	Research taking place under the auspices of the University of York must adhere to the Code of Practice on Research Integrity , which is in turn reliant upon the concordat. In 2020/21 RSPO will be working with the managers of funds which are redistributed in competitions, both internal and external, to ensure the inclusion of a specific statement referring to awardees’ responsibilities under the Code of Practice on Research Integrity
<u>Commitment Two</u> : We are committed to ensuring that research is conducted according to appropriate ethical, legal and professional frameworks, obligations and standards.		
Researchers must...	2.1.1. Comply with ethical, legal and professional frameworks, obligations and standards as required by statutory and regulatory authorities, and by employers, funders and other relevant stakeholders.	Researchers are supported to do this – see 1.2.3 for more.

	<p>2.1.2. Ensure that all their research is subject to active and appropriate consideration of ethical issues.</p>	<p>The necessity of ethical review is key to our policies on research ethics and research integrity. In our Code of Practice on Research Integrity (2.3.2), researchers are reminded that “All research should undergo the appropriate ethical review. The cornerstones for the management of ethical issues within the University are self-reflection, explicit discussion, institutional accountability, and proportionality. That is to say, individuals undertaking research in the University’s name or on its behalf should take responsibility for actively considering whether their activities fall within the scope of the University’s ethical framework, and where this is the case, the activities should be formally considered and approved by the appropriate ethics committee(s) as set out in the University’s Code of Practice and Principles for Good Ethical Governance.”</p>
<p>Employers of researchers will...</p>	<p>2.2.1. Have clear policies on ethical review and approval that are available to all researchers.</p>	<p>Our Code of Practice and Principles for Good Ethical Governance is available on the University webpages. This Policy is supplemented by additional guidance, such as on social media data, clinical research, and research conducted outside the UK, to enable a full and thorough understanding of the research process. Our grant application system includes a question prompting staff to consider ethics and submit an ethics application where appropriate.</p>
	<p>2.2.2. Make sure that all researchers are aware of, and understand policies and processes relating to ethical approval.</p>	<p>Our Code of Practice on Research Integrity (6.8) notes the responsibility of the University to “[Bring] this Code of Practice and the University’s Research Misconduct Policy and Procedure to the attention of all those involved in research, in particular through induction provision for new staff and students.”</p> <p>From 2020/21, our Research Integrity and Ethics training will involve asking participants to complete a form before and after the session in which they self-assess their understanding of integrity and ethics. This will assist us in demonstrating researcher understanding and the ways in which our training sessions could be improved.</p>
	<p>2.2.3. Support researchers to adopt best practice in relation to ethical, legal and professional requirements.</p>	<p>The University provides resources to assist researchers in this area.</p> <p>The RSPO holds regular Research Integrity Forums, each focusing on a potentially difficult or challenging aspect of research, in order to support researchers in implementing best practice in their own work. As well as our Code of Practice on Research Integrity and Code of Practice and Principles for Good Ethical Governance,</p>

		<p>supplementary policies specific to certain aspects of research are available on our webpages. For example, researchers are able to find specific guidance on the use of social media data in research, research data management, and research conducted overseas. As a result of the COVID-19 outbreak in 2020, we have also developed specific guidance on the use of COVID-19 data, and conducting research from home.</p>
	<p>2.2.4. Have appropriate arrangements in place through which researchers can access advice and guidance on ethical, legal and professional obligations and standards.</p>	<p>The University provides avenues through which researchers can access advice and guidance on ethical, legal and professional obligations and standards. Guidance on research integrity and ethics is available from the Research Strategy and Policy Office (RSPO), and a specialist email (research-integrity-and-ethics@york.ac.uk) allows researchers and staff to submit queries to the team. The use of a joint email for the integrity and ethics team means questions and concerns can be handled even when certain staff members are out of office.</p>
Funders of researchers will...	<p>2.3.1. Engage thoroughly with the signatories and other stakeholders, in order to explore ways of streamlining their requirements to reduce duplication, inconsistency and/or conflict.</p>	<p>The University is a member of the Russell Group Research Integrity Forum (RGRIF) and the North East Ethics and Integrity Group (see 3.2.1), and as part of these works with other institutions to streamline requirements. For example, as part of RGRIF, the University was involved in developing the Russell Group Statement of Cooperation in respect of cross-institutional research misconduct allegations.</p>
	<p>2.3.2. Ensure that their requirements are, through regular review, proportionate, relevant and consistent with the expectations of the concordat.</p>	<p>Where the University is the funder, see 5.1.3.</p>
	<p>2.3.3. Incorporate proportionate checks, where appropriate, in the application and award processes related to legal and ethical requirements.</p>	<p>The University has an established framework for checking externally funded research applications. These are approved through Worktribe, the approval process involves confirmation that ethical issues have been identified and addressed. The Research Grant Operations team also conducts checks to confirm any proposed partners or collaborators are appropriate, which includes consideration of their approach to integrity.</p> <p>During 2020/21, the RSPO will:</p>

		<p>(i) bring together informal practices to develop a formal procedure to apply this established framework to situations where the University acts as a funder of research.</p> <p>(ii) work with internal funding teams across the University as well as HR to develop a guidance document for applicants and to be used in calls for proposals, which will signpost specific codes of practice and other policies with which researchers must comply.</p>
	2.3.4. Only provide funding to organisations that can demonstrate that appropriate structures are in place to ensure research integrity in their research activities.	<p>The University undertakes due diligence on potential research collaborators as appropriate. This includes an assessment of research governance policies, including those relating to integrity, to ensure integrity is supported.</p> <p>With regards to research ethics, the position of the University is that the highest ethical standards should be met; this means that, even where overseas partners or collaborators might have fewer requirements governing research, the standards of the University of York must be upheld.</p>
	2.3.5. Clearly identify and indicate any specific codes of practice and other policies that researchers and employers of researchers are expected to comply with, beyond those that might be generally expected.	<p>Researchers have a responsibility to comply with our research policies, and these are available on our research governance webpages. Researchers are made aware of these policies upon induction and through training. During 2020/21, the RSPO will be working with internal funding teams across the University as well as HR to develop a guidance document for applicants and to be used in calls for proposals, which will signpost specific codes of practice and other policies with which researchers must comply.</p>
<p>Commitment Three: We are committed to supporting a research environment that is underpinned by a culture of integrity and based on good governance, best practice and support for the development of researchers.</p> <p><i>**A research environment that helps to develop good research practice and embeds a culture of research integrity must, as a minimum, have (i) clear policies, practices and procedures to support researchers (ii) training of research ethics and integrity with suitable learning, training and mentoring opportunities to support the development of researchers' skills throughout their careers (iii) robust management systems to ensure policies are implemented (iv) awareness among researchers of expected standards and behaviours (v) systems within the research environment that identify potential concerns at an early stage (vi) mechanisms for providing support to researchers in need of assistance (vi) policies in place that ensure that there is no stigma attached to researchers in need of assistance (vii) clear processes for the raising of concerns.</i></p>		
Researchers will...	3.1.1. Take responsibility for keeping their knowledge up to date on the frameworks,	The University is clear that it is the responsibility of researchers to identify relevant frameworks, standards and obligations and ensure they understand these, and to seek out further training or guidance as necessary. Our Code of Practice on Research

	standards and obligations that apply to their work.	Integrity states clearly that “All researchers have a duty to the research community and to society as a whole to act according to the highest standards of research integrity, and the primary responsibility for this lies with the individual” (2.6).
	3.1.2. Collaborate to maintain a research environment that encourages research integrity.	The University emphasises the importance of a robust culture of integrity and the role of all members of the research community in upholding these values. Researchers are encouraged to collaborate to support integrity within the University and academia as a whole. For example, we hold regular Research Integrity Forums; these events involve researchers from across the University gathering to discuss specific issues with relevance to research integrity.
	3.1.3. Design, conduct and report research in ways that embed integrity and ethical practice throughout.	For how the University supports researchers to do this, see 2.2.3.
Employers of researchers will...	3.2.1. Embed these features in their own systems, processes and practices.	<p>We have a suite of policies, practices and procedures in place to support researchers, and these are available on our research governance webpages.</p> <p>We supplement the guidance given in these policies with training, both online and in person. Training is necessary for postgraduate research students. In-person sessions for this are conducted by the Research Excellence Training Team (RETT) in conjunction with RSPO, and our online training for integrity and ethics is overseen by RSPO and the Academic Support Office. We also offer specialised training within departments when requested; for example, RETT works with the Department of Biology to deliver discipline-specific sessions for researchers. We recognise the importance of training throughout careers, and consequently include sessions of integrity and ethics in our Future Leaders programme, and our training calendar for the Post-Graduate Certificate in Academic Practice. Our training is reviewed regularly to ensure it remains appropriate, and in 2020/21 we plan to offer two new training sessions on Responsible Research & Innovation and Safeguarding respectively.</p> <p>A strong understanding of integrity and ethics is key in our research community, and these topics are foregrounded in our resources and support for researchers. From 2020/21, participants in training sessions will be sent a form asking about their</p>

		<p>understanding of research integrity and ethics prior to and following their session, in order to assess the effectiveness of the training in improving understanding of research integrity and ethics. Such training empowers researchers to identify concerns within their research at an early stage, allowing them to consider and address these as part of the ethics approval process.</p> <p>We have strong governance structures in place in order to effectively implement policies. A key component of this is the Annual Departmental Research Review (ADRR), in which departments are asked to reflect on their research profile and provide information on policies such as their research strategy and workload model. Due to the REF and COVID-19 pandemic, the ADRR has not taken place in the 2019/20 academic year. We also complete a yearly ethical audit of an ESRC-funded project (committee chosen by the Chair of the AECC and the specific project selected by the Chair of the chosen departmental ethics committee).</p> <p>The University has clear processes in place for the raising of concerns – for more on this, see the information under Commitment Four. We are clear that no stigma should be attached to researchers in need of assistance. Our Research Misconduct Policy and Procedure acknowledges that, in certain cases, an instance of misconduct may be down to a lack of training (a capability issue), and in such cases we offer support and guidance in order to develop our researchers.</p>
	<p>3.2.2. Reflect recognised best practice in their own systems, processes and practices.</p>	<p>We engage in sector-wide activity to assist in the development and adoption of best practice. We are a long-standing member of the Russell Group Research Integrity Forum (RGRIF), and the work of this group has been commended by the UK Research Integrity Office (UKRIO) and the Commons Science and Technology Committee. We are also involved with the North East Integrity and Ethics Forum, which is a resource- and practice-sharing group of universities in the north-east of England. Involvement with such groups enables us to continually reflect on our own systems and processes, and ensure we reflect best practice and engage in ongoing discussion in the sector.</p>

		Our internal processes are consultative to ensure members of the research community are involved throughout the development of policies, procedures and codes of practice.
	3.2.3. Implement the concordat within their research environment.	This document outlines the ways in which the concordat is embedded within our research environment.
	3.2.4. Participate in an annual monitoring exercise to demonstrate that the institution has met the commitments of the concordat.	Once in place, the University will engage in an annual monitoring exercise as required to demonstrate our commitment to fulfilling the requirements of the concordat.
	3.2.5. Identify a named member of staff to oversee research integrity and ensure that this information is kept up to date and publicly available on the institution's website.	The member of staff responsible for research integrity is Ms Zoe Clarke, Research Strategy and Policy Officer (Integrity). Contact details are available on our research integrity webpages . We also have a dedicated research integrity and ethics email address .
	3.2.6. Identify a named member of staff who will act as a first point of contact for anyone wanting more information on matters of research integrity, and ensure that contact details for this person are kept up to date and are publicly available on the institution's website.	The first point of contact for anyone in need of further information on matters of research integrity is the Pro-Vice-Chancellor for Research, Professor Matthias Ruth (matthias.ruth@york.ac.uk). Contact details are available on our research integrity webpages .
Funders of research will...	3.3.1. Promote adoption of the concordat within the research community.	We are committed to the implementation of the concordat, and prioritise embedding its principles and encourage the adoption of it within the research community. For more on how we do so, see 3.2.1.
	3.3.2. Support the implementation of the concordat through shared guidance, policies and plans.	Guidance, policies and plans in support of the concordat are available on our research integrity and ethics webpages, as well as specific information on training opportunities . For more on how we embed the concordat within the research environment, see 3.2.1.

	<p>3.3.3. Identify within their organisation a senior member of staff responsible for oversight of research integrity and ensure that this information is publicly available on the website.</p>	<p>Where the University is the funder, see 3.2.6.</p>
	<p>3.3.4. Consider whether their policies and processes create disincentives for the creation and embedding of a positive research culture.</p>	<p>Our policy for research evaluation using quantitative data offers guidance for members of the research community as to how research metrics might be used responsibly, to avoid the use of inappropriate disincentives for the creation and embedding of a positive research culture. Further, our Statement on Research Performance Expectations states that “in line with its Policy for research evaluation using quantitative data the University does not assess outputs on the basis of place of publication or journal impact factor” (paragraph 7).</p> <p>We are working with colleagues across the University to implement the guidance from the Wellcome Trust regarding the implementation of DORA, and during 2020/21 we hope to host a training and information session for HR staff with a representative from INORMS on this topic.</p>
	<p>3.3.5. Work in partnership with employers and researchers to embed a culture of integrity within the research community.</p>	<p>Within the University, our Research Strategy and Policy team, including the research integrity and ethics officers, works alongside staff within the University responsible for research grants and research management as well as HR.</p> <p>Representatives from our research support office frequently attend sector-wide events in support of research integrity, engaging with funders, employers and researchers to embed integrity within the research community (see 3.2.2). For example, during 2019/20, representatives from the RSPO attended ARMA events, seminars run by Wellcome and by UKRIO in support of the new concordat, and specific sessions concerning safeguarding, ethics management and due diligence.</p>
	<p>3.3.6. Encourage adoption of the concordat by associating it with their funding conditions.</p>	<p>Research at York is dependent on compliance with our Code of Practice on Research Integrity, which is in turn in line with and contingent upon the concordat.</p> <p>In 2020/21 RSPO will be working with the managers of funds which are redistributed in competitions, both internal and external, to ensure the inclusion of a specific</p>

		statement referring to awardees' responsibilities under the Code of Practice on Research Integrity
<u>Commitment Four:</u> We are committed to using transparent, timely, robust and fair processes to deal with allegations of research misconduct when they arise.		
Researchers will...	4.1.1. Act in good faith with regard to allegations of research misconduct, whether in making allegations or in being required to participate in an investigation, and take reasonable steps, working with employers as appropriate, to ensure the recommendations made by formal research misconduct investigation panels are implemented.	For how the University supports researchers to do this, see 4.2.4.
	4.1.2. Handle potential instances of research misconduct in an appropriate manner; this involves reporting misconduct to employers, funders and professional, statutory and regulatory bodies as required.	For how the University supports researchers to do this, see 4.2.1 and 4.2.2.
	4.1.3. Declare and act accordingly to manage conflicts of interest.	The appropriate manner in which to deal with conflicts of interest is detailed in section 3.5 of our Code of Practice on Research Integrity. Conflicts of interest are specifically referred to and addressed in our Research Integrity and Ethics training, both in relation to interests of the researcher and interests of funders (where relevant). The University Council requires Heads of Departments to maintain a local Register of Interests of staff within their department, which should be updated annually, in line with the Departmental Register of Declared Interests: Guidance Notes for Heads of Department .
Employers of researchers will...	4.2.1. Have clear, well-articulated and confidential mechanisms for	Our Research Misconduct Policy and Procedure sets out our mechanisms for reporting allegations of research misconduct. Our misconduct policy is based on the

	<p>reporting allegations of research misconduct.</p>	<p>principles of fairness, integrity and confidentiality, and specifies that “allegations of research misconduct will be investigated with a commitment to there being no detriment and a balanced approach”.</p> <p>Regular meetings between HR and RSPO enable the sharing of information and the early-identification of issues, however due to the ongoing situation with COVID-19, these meetings have been postponed. Currently, discussion is ongoing regarding misconduct procedures in non-research activity. These meetings led to the successful implementation of new procedures to meet requirements from the Wellcome Trust on Bullying and Harassment reporting.</p>
	<p>4.2.2. Have robust, transparent and fair processes for dealing with allegations of misconduct that reflect best practice. This includes the use of independent external members of formal investigation panels, and clear routes for appeal.</p>	<p>Our Research Misconduct Policy and Procedure sets out the process through which allegations are dealt with fairly and promptly. This includes setting out a timeframe in order to ensure allegations are dealt with fairly and promptly; it is specified that “The investigation should be completed and the final report sent to the PVCR within 90 days.” Our Dignity at Work policy “provides procedures and mechanisms for reporting and addressing reports of harassment, bullying and hate incidents”, further supporting our commitment to the use of best practice when handling allegations of misconduct.</p> <p>Regarding the provision that formal investigation panels use “independent external members”, the University (as part of the Russell Group Research Integrity Forum) has asked for clarity as to how this might work in practice. Once we have a greater understanding of the practicalities and specifics of this requirement, we will take steps to incorporate it into our systems.</p>
	<p>4.2.3. Ensure that all researchers and other members of staff are made aware of the relevant contacts and procedures for making allegations.</p>	<p>Information regarding the relevant contacts and procedures for the making of allegations is available to staff at all levels, including researchers. Contact information for our named individuals (see 3.2.5 and 3.2.6) is posted on our Research Integrity and Ethics webpages. Information relating to research integrity contacts is distributed to PGR students upon induction, and contact details are signposted as part of our Research Integrity and Ethics training sessions.</p>
	<p>4.2.4. Act with no detriment to whistle-blowers who have made allegations of misconduct in good</p>	<p>The University is committed to fostering an environment in which allegations of misconduct can be raised without fear of reprisal or unjust treatment.</p>

	<p>faith, or in the public interest, including taking reasonable steps to safeguard their reputation. This should include avoiding the inappropriate use of legal instruments, such as non-disclosure agreements.</p>	<p>Our research misconduct policy and procedure explicitly states that “Any matter raised in good faith under this procedure will be investigated thoroughly, promptly and confidentially, and the outcome of the investigation reported back to the member of staff who raised the issue.” Further, the policy notes that “The University will not tolerate victimisation of a member of staff or Research Student for raising a matter under this procedure. The continued employment and opportunities for future promotion or training of the member of staff will not be prejudiced because s/he has raised a legitimate concern.”</p> <p>Where settlement agreements are used, these do not include the use of non-disclosure agreements.</p>
	<p>4.2.5. Take reasonable steps to resolve any issues found during the investigation. This can include imposing sanctions, requesting a correction of the research record and reporting any action to regulatory and statutory bodies, research participants, funders or other professional bodies as circumstances, contractual obligations and statutory requirements dictate.</p>	<p>Our Research Misconduct Policy and Procedure sets out the possible conclusions and outcomes of a research misconduct investigation, which include but are not limited to the following:</p> <ul style="list-style-type: none"> (i) A finding that the allegation is unfounded and research misconduct has not taken place; (ii) A finding that research misconduct has not taken place but there appears to be a capability or competency issue; (iii) A finding that research misconduct has taken place and it is recommended that action is taken under the University’s Disciplinary Procedure; and (iv) A finding that there is insufficient evidence to reach a definitive conclusion. <p>Potential outcomes of a research misconduct investigation at York are outlined in our Research Misconduct Policy and Procedure. Section 7 of our Disciplinary Procedure notes possible sanctions.</p> <p>As per the Research Misconduct Policy and Procedure, “The University will comply with the requirements and regulations of its funding bodies in relation to notification of formal investigations into allegations of research misconduct.” The decision as to whether information about allegations will be disclosed to specific parties (including the research funder) will be made by the PVC-R.</p>
	<p>4.2.6. Take reasonable steps to safeguard the reputation of individuals who are exonerated.</p>	<p>Our Research Misconduct Policy and Procedure specifies that:</p> <ul style="list-style-type: none"> ● “The confidentiality of individuals against whom allegations of research misconduct have been made and, if they wish it, that of those who in good

		<p>faith report the alleged misconduct, should be protected as far as possible, and care should be taken to protect their positions and reputations.</p> <ul style="list-style-type: none"> ● Except as required in the reporting provision above, only those directly involved in an enquiry or investigation should be aware that the process is being conducted or have any access to information obtained during its course. ● Where appropriate, efforts should be made to restore the reputations of those against whom allegations of research misconduct have been made when they are not considered to be founded.” <p>We also follow the no detriment principle when handling allegations:</p> <ul style="list-style-type: none"> ● “No individual against whom allegations of research misconduct have been made will have any sanction taken against them unless and until the allegation(s) have been upheld ● At any stage in the procedure, if appropriate, an employee may be suspended. Suspension is not a penalty and is not an indication of culpability and will be on full pay ● No individual who makes allegations of research misconduct against another individual in good faith will have any sanction taken against them“
	<p>4.2.7. Provide information on investigations of research misconduct to funders of research and to professional and/or statutory bodies as required by their conditions of grant and other legal, professional and statutory obligations.</p>	<p>The University is aware of the need to provide relevant information to professional and/or statutory bodies and is committed to doing so. Our Research Misconduct Policy and Procedure specifically notes that “If the University and/or its staff have legal obligations to inform third parties - for example funding bodies - of allegations of research misconduct, those obligations must be fulfilled at the appropriate time through the correct mechanism.”</p> <p>Ensuring these feedback routes are functional is key when developing new policies. For example, our Statement on Safeguarding in Research (June 2020) specifically notes that “The University has a responsibility to report breaches to funders where relevant, and to ensure an accurate procedure is followed and records maintained. The RSPO should be informed so that these responsibilities can be met and will inform the Pro-Vice-Chancellor for Research as appropriate.”</p>

		We take seriously our commitment to work alongside funders and professional/statutory bodies with respect to the provision of information pertaining to investigations. For example, we have developed a clearly defined procedure for the handling of bullying and harassment allegations in line with the requirements of the Wellcome Trust.
	4.2.8. Support their researchers in providing appropriate information when they are required to make reports to professional and/or statutory bodies.	Guidance from HR and the RSPO is available as necessary for all researchers required to make reports to professional and/or statutory bodies. Our Research Misconduct Policy specifies that “staff from the Research Grants and Contracts (RGC) [now named RGO] will be involved to determine such contractual/legal obligations and will initiate the necessary action with the funding body, advising the PVCr as appropriate.” Contact details for relevant RSPO staff are circulated upon induction and as part of research integrity and ethics training sessions.
	4.2.9. Provide a named point of contact or recognise an appropriate third party to act as confidential liaison for whistle-blowers or any other person wishing to raise concerns about the integrity of research being conducted under their auspices. <i>**This need not be the same person as the member of staff identified to act as first point of contact on research integrity matters, as recommended under commitment three.</i>	As per our Research Misconduct Policy and Procedure, “to make a complaint of Research Misconduct, the individual (referred to as the complainant) should write to their Head of Department (HoD) stating that they wish to make a complaint of research misconduct.” Individuals wishing to make a complaint can also directly contact the Pro-Vice-Chancellor, Professor Matthias Ruth, who is the named point of contact for issues of research integrity.
Funders of research will...	4.3.1. Publish clear statements of what constitutes research misconduct.	Research misconduct is clearly defined in our Research Misconduct Policy and Procedure , as follows: “Research Misconduct is characterised as behaviour or actions that fall short of the expected high standards of research integrity and includes the following which form part of the RCUK Policy and Guidelines on Governance of Good Research Conduct, February 2013 (rev. 2015 and 2017).

		<p>Research Misconduct may include, but is not limited to the following:</p> <ul style="list-style-type: none">● Fabrication● Falsification● Plagiarism● Misrepresentation, including<ul style="list-style-type: none">○ Misrepresentation of data○ Undisclosed duplication of publication, including undisclosed duplicate submission of manuscripts for publication○ Misrepresentation of interests, including failure to declare material interests either of the researcher, the funder of the research or of participants○ Misrepresentation of qualifications and/or experience, including claiming or implying qualifications or experience which are not held○ Misrepresentation of involvement, such as inappropriate claims to authorship and/or attribution of work where there has been no significant contribution, or the denial of authorship where an author has made a significant contribution● Breach of duty of care whether deliberately, recklessly or by gross negligence including<ul style="list-style-type: none">○ Disclosing improperly the identity of individuals or groups involved in research without their consent, or other breach of confidentiality○ Placing any of those involved in research in danger, whether as subjects, participants or associated individuals, without their prior consent, and without appropriate safeguards even with consent; this includes reputational danger where that can be anticipated○ Not taking all reasonable care to ensure that the risks and dangers, the broad objectives and the sponsors of the research are known to participants or their legal representatives, to ensure appropriate informed consent is obtained properly, explicitly and transparently○ Not observing legal and reasonable ethical requirements or obligations of care for animal subjects, human organs or tissue used in research, or for the protection of the environment
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	<p>4.3.2. Ensure that recipients of funding are aware of requirements regarding the investigation and reporting of research misconduct, and that these are openly stated.</p>	<p>Our Research Misconduct Policy and Procedure covers “all those undertaking research under the University’s auspices”, including contractors and consultants, and therefore applies equally to University-funded and externally funded research. The University Guidance on the allocation of internal funding for research and impact states that it is “good practice” to remind PIs of policies relating to research integrity and ethics.</p> <p>During 2020/21, the RSPO will be working with internal funding teams across the University as well as HR to develop a guidance document for applicants and to be used in calls for proposals, which will signpost specific codes of practice and other policies with which researchers must comply.</p>
	<p>4.3.3. Work with employers of researchers to manage funding appropriately, including any staff supported by an affected project.</p>	<p>It is important that internal funding is allocated fairly and equitably. Our Guidance on processes for allocation of internal funding for research and impact states: “Successful applicants should be provided with a clear statement of the terms and conditions pertaining to their award. These are likely to include:</p> <ul style="list-style-type: none"> ● The deadline for spending against the award. For internal University funds, this is almost always the University’s year end ie 31 July in the academic year in question, following which all remaining balances are cleared back to central University funds. ● Requirements regarding reporting on the outcomes of awards. Reporting should take place via PURE wherever possible.

		<p>It is good practice also to remind PIs of the University's Codes of Practice on Research Integrity and Ethics, which apply to all those undertaking research under the University's auspices."</p> <p>Across the sector, grants in which the awarded institution has responsibility for distributing funds are increasingly common. We are aware of the need to develop our ethics and governance procedures further to ensure we capture any issues arising from such funding. RSPO is working with our internal funding team, as well as project leads from research centres in receipt of such funding, to address this issue.</p>
	4.3.4. Treat all allegations with confidentiality and abide by data protection laws with respect to data management.	<p>Our Research Misconduct Policy and Procedure is based on the three founding principles of Fairness, Integrity and Confidentiality. In terms of Confidentiality, we state the following:</p> <ul style="list-style-type: none"> • "The procedure will be conducted as confidentially as possible, in order to protect those involved in an investigation provided this does not compromise the investigation of the allegation(s), or health and safety of participants in the research • Where possible any disclosure to third parties should be made on a confidential basis • If the University and/or its staff have legal obligations to inform third parties - for example funding bodies - of allegations of research misconduct, those obligations must be fulfilled at the appropriate time through the correct mechanism." <p>Our research policies align with GDPR requirements.</p>
	4.3.5. Take appropriate action when research misconduct is reported to them. In the most serious case, this could include funding sanctions or mandatory improvements.	<p>The University takes allegations of research misconduct seriously, and takes appropriate action to investigate and respond to such instances. The process for doing so is outlined in our Research Misconduct Policy and Procedure, where we note possible outcomes of an investigation, including but not limited to funding sanctions and the retraction of research.</p>
Commitment Five: We are committed to working together to strengthen the integrity of research and to reviewing progress regularly and openly.		
Employers of researchers will...	5.1.1. Take steps to ensure that their environment promotes and	We take our commitment to the concordat seriously, and strive to embed both an environment of research integrity and adequate misconduct procedures. We

	<p>embeds a commitment to research integrity, and that suitable processes are in place to deal with misconduct.</p>	<p>engage in sector-wide discussion and centre research integrity in our internal conversations and decision-making processes. Researchers are supported to fully consider integrity and ethics throughout the research processes. Suitable processes are in place to deal with misconduct (see Commitment Four).</p>
	<p>5.1.2. Provide a short annual statement, which must be presented to their own governing body, and subsequently be made publicly available, ordinarily through the institution's website. **A link to this statement should be sent to the Concordat Secretariat.</p>	<p>Our annual statement for 2019/20 has been completed, and is currently with Council (the University's governing body) for approval. As required, this statement covers:</p> <ul style="list-style-type: none"> (i) A summary of actions and activities in support of research integrity; (ii) A statement to provide assurance that the processes in place to handle misconduct are adequate; (iii) A statement on formal investigations of misconduct and lessons learnt; <i>and</i> (iv) A statement on how a supportive research environment is embedded. <p>Statements from previous years are available on our research integrity and ethics webpages. Once approved by Council, the 2019/20 statement will be hosted on this webpage also, and a link sent to the Concordat Secretariat.</p>
	<p>5.1.3. Periodically review their processes to ensure that these remain fit for purpose.</p>	<p>Our policies and procedures are reviewed regularly to ensure they remain fit for purpose, and this is most often done on a three-year cycle. The policies due for review in 2020/21 are:</p> <ul style="list-style-type: none"> ● Policy on Research Data Management; <i>and</i> ● Code of Practice and Principles for Good Ethical Governance. <p>We also review policies when new developments arise to ensure we are in line with good practice across the sector. In light of this, during 2020/21 we will review our Policy for Research Evaluation using Quantitative Data as part of our implementation of the Wellcome Trust Guidance on the Implementation of DORA. The University Research Strategy is reviewed as part of the development of the University Strategy for 2030, currently ongoing.</p> <p>The disruption to business as usual activities resulting from COVID-19 has brought a delay to the review of those policies due in 2020.</p>

		Our training offering is reviewed annually to ensure thoroughness. This process is handled centrally by the RETT and the RSPO. Our online Research Integrity Tutorial (mandatory for PGR students) is reviewed once a year in line with our review plan. The in-person training offered by RETT is considered at the end of each academic year in order to plan most effectively for the upcoming year.
Funders of research will...	5.2.1. Periodically review their policies and grant conditions to ensure that they support good practice in research integrity.	<p>For University policies and procedures, see 5.1.3.</p> <p>Processes for the distribution of research priming funds are reviewed regularly through the University Research Priming committee, which reports to and has proposals approved by URC. Our Guidance on processes for allocation of internal funding for research and impact is also owned by URC, and this identifies the good practice of signposting the University's Codes of Practice on integrity and ethics.</p> <p>During 2020/21, the RSPO will be working with internal funding teams across the University as well as HR to develop a guidance document for applicants and to be used in calls for proposals, and this will help in ensuring our communications regarding grant conditions support good practice in research integrity.</p>
	5.2.2. Periodically review their processes and practices to ensure that these are not providing inappropriate incentives.	Where the University acts as a funder, see 3.3.4.