

## **Annual Statement on Research Integrity 2022/23**

### **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 research activity is overseen by University Research Committee (URC), reporting to the University Senate which oversees all academic matters. Research is directed, supported and monitored through a range of [research governance policies](#), which outline the expectations both for researchers themselves and those supporting research activity. The Policy, Integrity and Performance (PIP) leads in this area, working alongside colleagues from across the institution to develop policies which align with requirements and good practice within the sector as a whole.

The University's Statements are published at:

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

### **Statement for 2022/23**

1. During 2022/23, the University has undertaken the following actions and activities to support and strengthen understanding and application of research integrity issues:
  - (a) The Research Strategy for the University, currently in the final stages of refinement prior to implementation, references research integrity and ethics specifically, speaking to the emphasis placed on this area by the institution. People and Culture is

also placed front and centre, highlighting the University's commitment to enabling the community to work with integrity and equitability.

- (b) The Professional Services Ethics Committee is now fully operational, ensuring that research projects taking place within Professional Services are subject to appropriate oversight.
- (c) In order to allow the Academic Ethics and Compliance Committee to have oversight of the processes, operation and management of local committees, a reflective review process has been implemented.

Each committee is required to undertake an ethical conduct audit of an active or recently completed project comparing progress to what was agreed at ethical review, identifying good practice and areas for improvement. Local Research Ethics Committees are invited in turn, covering the full range within a 3-year rolling cycle.

- (d) Following the establishment of the School of Arts and Creative Technologies, the existing local ethics committees for Theatre, Film, Television and Interactive Media (TFTI) and Music were combined into a single committee covering the school as a whole. The amalgamation of the two committees has been successful and was managed well, with applications processed in a timely manner throughout.
- (e) Work has taken place to refine and strengthen the University's approach to the Prevent Duty in regards to research, which has included the development of a series of webpages outlining the purposes of and the responsibilities associated with Prevent, as well as providing further information on the Prevent Duty Oversight Group.
- (f) A review of the Research Misconduct Policy & Procedure was initiated, informed by the example Policy and Procedure produced by UKRIO. Thus far, the review had highlighted the need for the following: (i) a clear 'path' for the handling of cases involving PGRs, (ii) an appeals process and (iii) a flowchart to aid in determining the route through the procedure.
- (g) In order to effectively manage matters arising from the government's Trusted Research Initiative, the Policy Integrity and Performance team has (i) regularly met with the government's Research Collaboration Advice Team, (ii) explored suitable governance and risk escalation structures, (iii) undertaken initiatives around the key activities of due diligence and export control, as described in this document by activities (h) and (i).
- (h) Work continued to improve oversight of due diligence procedures at the University. A Due Diligence Operations Group has been set up following a PwC audit in 2022, and

this is supported by a series of smaller working groups. An escalation procedure for high-risk research is under development.

- (i) Further to the above, the Policy, Integrity and Performance Officer (Compliance) and the University Research Integrity and Compliance Manager have met with a range of academic colleagues to discuss the requirements of export control legislation, including delivering information sessions to those departments with the highest risk of exposure.
- (j) Over the winter of 2022/23 the PIP team coordinated the response to an audit from the Office of Product Safety and Standards on compliance with the Nagoya Protocol. The protocol is an international agreement governing access to non-human genetic resources and associated traditional knowledge, and the sharing of benefits arising from their utilisation in research. The audit highlighted a number of improvement areas which are currently under consideration.
- (k) The Policy, Integrity and Performance Officer (Compliance) and the University Research Integrity and Compliance Manager have met with a range of academic colleagues to discuss the requirements of export control legislation, including delivering information sessions to those departments with the highest risk of exposure.
- (l) Conversation on the topic of generative AI and its impact on research had been initiated, with the intent of establishing a working group to discuss approaches to the area that address issues of concern and enable the benefits of new tools.
- (m) The new [Research Publications and Open Access Policy](#), effective from 1st March 2023, applies to all scholarly research articles (including conference proceedings) by University of York research staff. The policy aims to allow researchers to exercise greater sharing and reuse rights over their own research, whilst ensuring that they retain full freedom to publish in the journals of their choice, as well as aiding compliance with the open access requirements of research funders such as UKRI and the Wellcome Trust.
- (n) The Policy on Research Data Management is currently undergoing review, led by the Open Research team and supported by the PIP team. A number of changes were proposed to enhance the usability and efficiency of the policy, including streamlining text and more explicit guidance concerning PGRs.
- (o) York is committed to developing and maintaining a supportive, open and robust research culture, enabling the production of excellent research. The Research Culture Working Group (RCWG, established in 2022 and chaired by the PVC-Research) is now in full operation, and a number of meetings have been held to identify key areas of

work and potential solutions. The RCWG is made up of both academic and professional services colleagues from across the University.

Over spring 2023 a series of Research Culture Cafés were held, bringing together colleagues from specific areas (such as technicians, PGRs, and professional services) to discuss the current University culture and ways in which practice and culture might be improved. Research integrity was one of the potential topics of discussion attendees could choose to focus on.

- (p) On the topic of Responsible Research and Innovation (RRI), we have carried out a programme of cross-institutional engagement during 2022/23. This was led by our Research Champion for Risk, Evidence and Decision Making (Dr Richard Friend) and included structured interviews with 34 experienced academics across Faculties and Disciplines with track records in impact and stakeholder engagement. These varied experiences formed the outline of a Results Framework for RRI that was presented and further co-developed with a cross-Faculty group of early career researchers. This has resulted in a proposed 'Results Framework for Equitable and Responsible Research' that, following further development, refinement and testing, is intended to be widely rolled out across the institution.
- (q) The PIP team was working to develop guidance on the development or review of policies, which would outline the core components needed in effective policies, as well as suggested consultation routes. The guidance would be internal initially, and was intended to help refine and strengthen research governance at the University. This was supported by a timeline of policy reviews, informed by the PIP review (2022). The review of the Research Publications and Open Access Policy (1(j)) and the review of the Policy on Research Data Management (1(k)) had also enabled reflection on the most effective approaches to policy development and revision.
- (r) The University remained a 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) Members of the PIP team now meet regularly with Faculty Research Managers to share information and areas of concern. Similarly steps have been taken to ensure the Quality Support Officer for York Graduate Research School (YGRS) is included in discussions of policy, to ensure the interests and specific concerns of PGRs are considered. The Head of PIP also sits on the YGRS Policies and Programmes Sub-Committee, further enabling coordination between the two areas of University business.
- (t) Training and support additional to the University's core provision has been offered as follows:

- i. The University's online Research Integrity Tutorial (RIT) will be reviewed in-depth upon the release of further material from UKRIO. In the meantime, the RIT will be subject to a light-touch review to check for accuracy and usability.
  - ii. Over 2022/23 the University launched the 'Preparing for Fellowship Success' training, which offers guidance on fellowship applications to potential applicants both within and outside the institution. This includes a slot dedicated to research integrity and ethics, with a focus on assessing risk and the benefits of doing so, emphasising the ways in which reflecting on the risks associated with research can both improve understanding of a project and strengthen funding applications.
  - iii. The University recently launched the 'Being an Effective Research Supervisor Tutorial' (BERST), a mandatory tutorial for supervisors. This is accompanied by a series of webpages to support supervisors and signpost resources for further learning. The University is dedicated to supporting both supervisors and PGRs to develop the most effective relationship possible and has been involved in national efforts at this level.
  - iv. Mandatory training on data protection is now offered via a new provider and is supplemented with face-to-face tailored data protection training sessions for researchers.
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, as noted above (1(f)).
  - (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). This will be used to inform the review of the Policy and Procedure and any future work in this area.
3. Statement on formal investigations of research misconduct and lessons learnt:
  - (a) During 2022/23, we investigated one instance of suspected research misconduct, relating to the conducting of research by a postgraduate researcher without appropriate ethical approval in place. It was identified that this was a competency

issue and additional training was put in place for both the postgraduate researcher and the supervisor.

Further to the above, the BERST tutorial (1(s)(iii)) and the online Research Integrity Tutorial have both been amended to emphasise the importance of obtaining ethical approval for interviews with all individuals, including public figures.

(b) The University is committed to learning lessons from instances of misconduct.

Common issues arising in misconduct cases are noted and will be used to inform the review of our online Research Integrity Tutorial (RIT), as has already been seen in our response to the case discussed in 3(a).

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.

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.

The above is paramount in our review of the Research Misconduct Policy & Procedure, which will be undertaken with an emphasis on a supportive and engaged approach, taking into account the wellbeing of all involved. We recognise that an overly punitive and formal approach to such investigations risks being too intimidating, potentially stifling the effectiveness of the policy.

We are dedicated to supporting a research culture which encourages and enables honest, in-depth discussions on research integrity; this is supported by the Research Culture Working Group, noted above (1(n)). 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.