



Research Integrity Annual Statement 2019-20

2019 Concordat to support research integrity

1. As with the 2012 Concordat to support research integrity (the 'concordat'), UCL fully supports the revised concordat and continues to review and revise its policies, processes and guidance to provide a supportive environment and culture for its researchers and their research.
2. This includes the planned creation of a new research ethics website with a revised structure in order to improve the transparency and ease of access to guidance. The website is currently under development with the aim of it being launch early in 2020-21, when it will replace the current research ethics website (<https://ethics.grad.ucl.ac.uk/>).
3. The events of 2020 due to COVID-19 have had a significant impact upon research across the UK and, in turn, impacted the progress of various ongoing projects and the commencement of additional planned projects; particularly in relation to training and guidance. These projects will continue over the academic year 2020-21 and will be reported in the next annual statement.

UCL Statement on Research Integrity – Updated March 2020

4. The UCL Statement on Research Integrity (the 'Statement') sets out UCL's stance regarding research integrity as well as the standards and expectations on UCL researchers. All staff (including honorary staff), students, visitors and contractors are expected to adhere to the Statement and the four Principles of Integrity (the 'Principles'), which were adopted in full from the 2012 concordat; honesty, rigour, open and transparent communication, and care and respect.
5. In 2019-20, the Statement was revised in order to incorporate advancements made within UCL with regards to supporting researchers and a culture of research integrity since the Statement was originally published in May 2015.
6. The revision also reflected the changes set out in the 2019 revision of the concordat. In doing this the new 'accountability' element was adapted in order to bring this in line with UCL's expectation of *personal responsibility*; which will also be reflected in the revised version of the Code of Conduct for Research;

Personal responsibility for your own actions, in how you conduct your research and how you work collaboratively with others. Though everyone involved in research will have their own specific responsibilities and levels of formal accountability, every individual has a responsibility to act with integrity and to take responsibility for their own actions or inactions.

7. The approved revised Statement is available on the research integrity website: www.ucl.ac.uk/research/integrity/ucl-statement-research-integrity

Enabling research and supporting our researchers during COVID-19

8. As with other institutions, the implications of the Covid-19 lockdown had a significant impact upon research, planned and on-going, for both staff and student researchers. A great deal of work was undertaken to ensure that staff and students were able to access up-to-date guidance and support, including guidance specific to research (both planned and for on-going projects), guidance on working from home and conducting research online, and funding support for students and staff.
9. The following represents some of the communications utilised during this time to support UCL researchers
 - Daily Coronavirus Update communication emails
 - A specific website relating to Coronavirus, including support options and guidance on support and reporting for potential cases. www.ucl.ac.uk/coronavirus/
 - Regularly updated webpages specific to guidance for research and researchers, including regarding research funding and guidance on how to continue research and the implications of lockdown (www.ucl.ac.uk/research-services/news/2020/sep/covid-19-impact-research-funding), as well as highlighting the work of UCL researchers in relations to responding to coronavirus. (www.ucl.ac.uk/covid-19-research/)

Revising research and ensuring ethical review

10. Lockdown necessitated that all on-going research involving in-person data collection was either suspended until in-person collection was permitted, or required adaption to move to purely on-line methods, which was a huge amount of work for all concerned.
11. In order to support and manage the scale of work involved in reviewing and approving these amendments, a 3 tier approval route was created to provide clarity to applicants, and to ensure appropriate rigour of review whilst streamlining the process where possible. An additional framework for priority review for Covid-19 related research was also established.
12. Clear guidance was published alongside the amendment process to guide researchers through the process of moving their projects online, as well as a decision tree to support this decision making process. www.ucl.ac.uk/research/integrity/ethics/research-human-participants/guidance-research-and-ethical-approval-light-covid-19-pandemic
13. In addition to the above, the ethical review structure for applications submitted to the Central UCL Research Ethics Committee ('UCL REC') was amended to include a new tier, that of 'lowest risk'. Currently, high risk applications are reviewed by the UCL REC, with the review of non-high risk applications undertaken by a pool of ethics reviewers.
14. The new tier, mirroring the review process for non-high risk applications, granted formal devolved authority to the Research Integrity and Ethics Team to review and approve research classed as 'lowest risk'. This approach further streamlines and supports the current system and need for ethical review, whilst also recognising the experience and rigour of review within the supporting team.

Restarting & resuming fieldwork

15. To support and enable the safe resumption of in-person fieldwork in non-UCL settings, a framework was published to guide researchers on how to commence new fieldwork, as well as resuming fieldwork that was underway prior to the move to remote working. The framework set out the process required to obtain authorisation for in-person fieldwork that could be undertaken safely and could not be carried out remotely. www.ucl.ac.uk/research/integrity/framework-starting-or-resuming-fieldwork-non-ucl-settings

16. The framework included clear guidance, ensuring that researchers can access the relevant UCL and external policies and guidance, and included a decision tree and checklist. Since publication, the framework continued to be reviewed and revised by the Fieldwork Framework Group to ensure that it remained up-to-date.
17. In addition to the framework, the Joint Research Office published guidance for researchers on pausing and restarting clinical research on UCL or UCLH premises. www.ucl.ac.uk/joint-research-office/covid-19-important-updates-researchers
18. The School of Life and Medical Sciences also agreed standard operating procedures (SOPs) with regards to restarting research on UCL premises. These detailed SOPs (both a general SLMS-wide, and local testing SOPs) set out clear and detailed safety procedures for data collection on UCL premises. These included detailed additional information sheets for potential participants specifically relating participating in research during Covid-19 to enable participants to make fully informed decisions.

Reviewing and streamlining processes to support a culture of research integrity

19. During the early part of the academic year, work continued on finalising the revised ethics policy and risk levels, as well as progressing with the design of the new online database. Demonstrations with potential vendors were held and feedback sought from UCL facilities on the potential systems.
20. Due to the impact of Covid-19, the decision was taken to put the project on hold until the new academic year, in order to focus on other essential areas.

Guidance and support for researchers

UCL Code of Conduct for Research revision

21. The revision of the current UCL Code of Conduct for Research continued in 2019-20, with feedback from the Advisory Board included in the revision.
22. Due to various matters, including the impact of Covid-19, the decision was taken to delay the UCL-wide consultation of the revised Code of Conduct for Research until the academic year 2020-21. The consultation is therefore scheduled for early 2021.

Statement on Transparency in Research

23. Following the consultation on reproducibility and transparency last year, the UCL Statement on Transparency in Research was unanimously approved by UCL's Academic Committee at a meeting on 14 November.
24. The Statement on Transparency in Research sets out the expectations UCL researchers, as well as how UCL will embed and support responsible practices across the university as part of UCL's broader commitment to upholding the highest possible standards in research and academia. www.ucl.ac.uk/research/strategy-and-policy/research-transparency
25. Online training to support researchers is currently in development, with the aim of completion in 2020-21.

UK Research and Innovation (UKRI) Safeguarding Policy

26. The task and finish group set up to review UCL policies and procedures in light of the UKRI Safeguarding Policy, created and published the following 2 additional UCL policies. Both of which have been included in the revised Code of Conduct for Research.

27. The UCL Safety and Wellbeing of Children and Adults at Risk Policy and Procedure (staff and students) supports researchers in being aware of their social, moral and legal obligations with regards to the safety and wellbeing of children and adults at risk involved in any UCL research activities. www.ucl.ac.uk/human-resources/policies/2020/apr/safeguarding-children-and-adults-risk-policy-and-procedure-staff-and-students
28. The Prevention of Bullying, Harassment and Sexual Misconduct Policy aims to ensure a safe, welcoming and inclusive working and learning environment for all members of the UCL community and to ensure that UCL students, staff and the wider UCL community are protected from bullying, harassment and sexual misconduct. www.ucl.ac.uk/equality-diversity-inclusion/dignity-ucl/prevention-bullying-harassment-and-sexual-misconduct-policy

Research Integrity – External Engagement

UK Research Integrity Office

29. In August 2020, as part of the UKRIO research integrity webinar series, Rowena Lamb (Head of Research Integrity, UCL) and Gail Seymour (Head of Research Ethics and Governance, University of Exeter) presented a session entitled ‘Embedding research integrity into research ethics frameworks’. The presentation drew on the experience of reviewing ethics policies and processes at both institutions, and presenting lessons learned and suggestions for how to approach the process from an integrity perspective. <https://ukrio.org/events/webinar-series/webinar-series-2020/>

League of European Research Universities (LERU)

30. UCL continues to be an active member of LERU, which is an association of 23 European research-intensive universities. As part of the Dual Use Thematic Group, UCL continues to contribute to the creation of a guidance document for universities on dual use compliance in academia.

Research Misconduct

31. The UCL procedure for investigating and resolving allegations of misconduct in academic research closely follows the UK Research Integrity Office’s model whilst allowing some minor variations to fit with local circumstances and usage of terminology. The Named Person has increased powers to resolve allegations that are considered to be straightforward and not considered to be serious in nature and there is no intent to deceive. UCL also has a standing pool of screening panellists from across all UCL’s faculties from which to draw to form screening panels. The current version of the UCL procedure for investigating and resolving allegations of misconduct in academic research (the procedure) was implemented on 1 January 2017. It can be accessed via the UCL website. www.ucl.ac.uk/srs/sites/srs/files/research-misconduct-procedure-jan-2017.pdf
32. In light of experience, a review of the procedure continued in 2019-20. It had been planned that the revised version of UCL’s procedure would be implemented in 2020. However, progress of these revisions was impacted due to this year’s events, and therefore work will continue over the next academic year, with a detailed report to be presented in next year’s statement.
33. A summary of the changes planned are as follows:
 - the establishment of a standing screening committee consisting of trained members drawn from across all UCL Schools, to be supplemented by co-opted members as required;

- to adopt a hybrid approach for handling cases of research student academic misconduct similar to current practice at some other institutions. Academic misconduct in relation to assessed work will be referred to UCL's student Academic Regulations, while misconduct in relation to work intended for publication or already published will be referred to the procedure;
- that taught student cases of academic misconduct be dealt with through UCL's student Academic Regulations;
- publication of appropriate anonymised summaries of proven cases of research misconduct similar to those published for student complaints by the Office of the Independent Adjudicator (OIA).

34. It is intended that the revised screening process and screening committee be set up in early 2021 to expedite this stage of UCL's process. The revised version of UCL's entire procedure will be implemented later in 2021 following appropriate consultation.

35. UCL is also keen to ensure that its scientific record is correct. It is considered that UCL should publish information where it has requested retractions of publications following a misconduct verdict at the formal investigation stage. Further consideration will be given to the: (i) timing and; (ii) content of the notice of the requested correction or retraction on the UCL website in 2020-21.

Lessons learned

36. Discussions continue on how best to draw out lessons to be learned from investigations of research misconduct (regardless of the outcome) in order to provide additional support and guidance for researchers and to further embed a strong culture across the institution

37. It is intended that the proposed screening committee draw out any lessons to be learned from its screening of allegations (regardless of outcome) at this earlier stage of the process and discussions continue on the best way to do this.

38. This earlier work and consideration is essential to ensure that relevant information is drawn out to support the consideration and embedding of lessons learned, whilst being able to maintain the confidentiality of the process. It also ensures that the essential distinction between the processes for (and staff involved in) investigating allegations of research misconduct from those responsible for enhancing and embedding a culture of integrity remains.

Summary of investigations

39. One case was referred for formal investigation in 2019-20. Two cases referred for formal investigation have been carried forward from 2018-19. All cases are still in process and aim to complete in 2020-21.