Research Integrity Annual Statement 2018-19

Reviewing and streamlining processes to support a culture of research integrity

1. The Ethics Review Steering Group, consisting of representatives from each faculty, and representatives from local ethics committees (both academic and administrative), continued to meet throughout the academic year. The Steering Group undertook a detailed review of the proposed new policy as well as defining and agreeing the levels of risk that will form the basis of proportionate review under the devolved system.

2. Both the policy and risk levels were sent to faculties for discussion. The feedback was very constructive and helped to reshape both the policy and risk levels. Though there are some remaining additional areas for clarification and agreement, both documents are near completion and represent a cross-institutional and cross-disciplinary view of research ethics for UCL.

3. In support of the revision of ethics across UCL, work continues on the design of a new online ethics application system which will support both the current and devolved system for ethical review. It is intended that the system will also streamline approval of research by combining the application process for ethics review and data protection registration. As with the policy and risk levels, faculty representatives will be given the opportunity to feed into the process so as to ensure that the system meets the requirements of UCL as an institution.

Guidance and support for researchers

UCL Code of Conduct for Research revision

4. As well as setting out expectations, UCL’s Code of Conduct for Research\(^1\) provides researchers with a set of general principles by which to conduct their research. The current Code of Conduct for Research was originally published in July 2013, and given the developments in research integrity over the previous years, a review of the code was undertaken.

5. The revised code has been expanded with personal responsibility being a key focus throughout. The revised format sets out the responsibilities of researchers for the different stages of the research lifecycle, while taking into account additional role-specific responsibilities, such as for supervisors, principal investigators and students.

6. As part of the revision process, comments and feedback were sought from staff within the Office of the Vice-Provost (Research), with an Advisory Board of academic colleagues from across UCL arranged for early 2019-2020. The final document will then be sent for UCL-wide consultation.

Overseas Research Roadmap

7. A roadmap detailing the considerations that need to be addressed when conducting overseas research has been published on the research integrity website\(^2\). An accessible version is also available, with an interactive version to be published when complete.

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\(^1\) www.ucl.ac.uk/srs/sites/srs/files/code-of-conduct-research.pdf
\(^2\) www.ucl.ac.uk/research/integrity/ethics/research-outside-uk
8. The roadmap was written in collaboration with multiple departments including Data Protection, Health & Safety, Research Services, the UCL and departmental Research Ethics Committees, Global Engagement Office, Library Services, and members of various UCL faculties.

Research with Children

9. UCL’s guidance on research with children\(^3\) was expanded to draw attention to the detailed guidance in the Ethical Research Involving Children Compendium\(^4\) created by the UNICEF Office of Research in a collaboration with other organizations. Resources within this include an International Charter and a Compendium on ethical issues and challenges, including over 20 case studies.

Statement on Transparency in Research

10. As part of UCL’s commitment to responsible and open research, UCL undertook a consultation on reproducibility and transparency. This included an online survey and town hall meeting, where a representative from the UK Reproducibility Network was invited to speak. Further to this, a UCL Statement on Transparency in Research was drafted and, if approved, will be published in the 2019-2020 academic year.

Dual Use

11. We have been reviewing research that involves dual-use items or technologies that need to be managed carefully to ensure that they are in line with legal requirements. The EU Dual-Use Regulation (EC) No 428 2009 (which has been adopted into UK legislation) relates to a system for export control of dual use items outside of the EU. Under the legislation Article 2(1), dual use items include “software and technology, which can be used for both civil and military purposes, and shall include all goods which can be used for both non-explosive uses and assisting in any way in the manufacture of nuclear weapons or other nuclear explosive devices”

12. UCL is a member of the League of European Research Universities (LERU) Dual-Use Ad-Hoc group, which has been liaising with the European Commission regarding guidance for compliance. The European Commission released the Internal Compliance Programmes document, which provides a framework to identify and manage dual-use trade controls. The Commission recognised that guidance tailored for research institutions was required to best support the development of compliance systems within the academic environment, and have been liaising with the LERU Dual-Use group with regards to this.

13. Within UCL, the Research Governance Committee authorised the creation of a Dual-Use Working Group to ensure UCL has appropriate systems and processes in place to manage such research and to ensure compliance.

14. In addition, in order to highlight the importance of compliance with UK export legislation, the UCL definition of ‘sensitive research’\(^5\) was expanded to include the following:

“Research involving or generating materials, methods, technologies or knowledge that has potential to harm humans, animals or the environment. This includes ‘dual use’ goods, services or technology, as defined on the UK export control

\(^3\) [https://ethics.grad.ucl.ac.uk/res_with_children.php](https://ethics.grad.ucl.ac.uk/res_with_children.php)

\(^4\) [www.childethics.com/](http://www.childethics.com/)

\(^5\) [www.ucl.ac.uk/research/integrity/sensitive-research](http://www.ucl.ac.uk/research/integrity/sensitive-research)
Training & Awareness Raising

General Data Protection Regulations

15. Last Academic year UCL launched mandatory online data protection training for all staff, including honorary staff and PhD students. This academic year the following additional courses were under development:
   - Refresher training for staff, including contract (associate staff) as well as honorary staff and PhD students;
   - Data Protection for Researchers & Students (PhD);
   - Data Protection for Undergraduate & Masters Level Students.

Research Integrity – External Engagement

Russell Group Research Integrity Forum

16. Following on from the publication of the Russell Group Statement of Cooperation in respect of cross-institutional research misconduct allegations, Rowena Lamb (Head of Research Integrity, UCL) and Dr Rhys Morgan (Research Governance and Integrity Officer, Cambridge) led a session at the UK Research Integrity Office’s 2019 Annual Conference on behalf of the Forum.

17. The session was entitled ‘In it together: managing cross-institutional research misconduct investigations’ and the presentation material can be viewed on the UKRIO website.

League of European Research Universities (LERU)

18. UCL continues to be an active member of LERU, which is an association of 23 European research-intensive universities. As part of the Research Integrity Thematic Group, UCL contributed to the creation of a guidance document for universities on embedding a culture of research integrity. It is anticipated that this will be published during the next academic year.

19. LERU sits on the European Commission’s Access and Benefits Sharing (Nagoya Protocol) Consultation Forum. Through the LERU Nagoya Protocol Ad-Hoc group, UCL contributed to the feedback on a guidance document developed by the European Commission regarding the use of biological resources and to what extent the Access and Benefits Sharing regulation applies to them.

Research Misconduct

20. 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 a 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

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6 www.ucl.ac.uk/data-protection/node/207
7 https://ukrio.org/events/2019-annual-conference/
(the procedure) was implemented on 1 January 2017. It can be accessed via the UCL website.

21. In light of experience, a review of the procedure was started in 2018-19. A number of changes are planned including:

- 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).

22. UCL is also keen to ensure that its research record is accurate and transparent. 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 2019-20.

23. The revised version of UCL’s procedure will be implemented in 2020.

Summary of investigations

24. One case of research misconduct was not upheld in 2018-19.

25. Two cases referred for formal investigation have been carried forward from 2018-19. Both cases are still in process and aim to complete in 2019-20.

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