Research Integrity Annual Statement 2021-2022

Enabling a healthy and sustainable research culture at UCL

1. Ensuring a supportive and collaborative research environment is an essential part of enabling and supporting researchers; not only to enable them to undertake high quality research, but also to provide them with a safe and supportive research environment where they are able to seek guidance and advise when needed, and to feel confident to admit errors in order to address them.

2. In the previous academic year, a Task and Finish Group undertook a scoping project to gather a deeper understanding of UCL's research culture, including challenges and positive influences (both internal and external) to identify any priority areas for improvement. This included an extensive consultation period with UCL's research community about their experiences and needs related to the environment in which research happens, including the expectations, values, attitudes and behaviours that enable our research excellence. www.ucl.ac.uk/research/strategy-and-policy/research-culture-ucl/research-culture-consultation

3. Five priorities were identified from the consultation, and a new Head of Research Culture was appointed to lead on the development of research culture at UCL. In addition the Enhancing Research Culture Programme (ERCP), funded through the £1.073m Research England allocation, was created to test interventions and inform the development of a long-term roadmap for change.

4. The ERCP opened up funding to academic and professional services staff to apply to run pilots that would consider areas most relevant to their areas whilst also being aligned with institutional priorities. In total 39 projects were funded, including 25 faculty-let projects and 14 cross-UCL projects. Information on these projects is available on the UCL Research Culture webpages: www.ucl.ac.uk/research/strategy-and-policy/research-culture-ucl/enhancing-research-culture-programme.

5. In addition, work is underway to create a Research Culture Roadmap which will draw together the priorities identified from the previous consultation, as well as lessons learned from the funded projects, into a long-term strategy for embedding a positive research culture.

6. It is anticipated that the Roadmap will be published in 2023.

Guidance and support for researchers – Embedding a culture of research integrity (Commitment 3)

UCL Code of Conduct for Research

7. As highlighted in the 2020-2021 statement, work was underway to produce a new Code of Conduct for Research. Originally published in 2013, the current Code was revised to incorporate the current expectations of research and researchers, as well as existing policies, processes and frameworks.

8. When revising the Code it was essential that new version should be a practical guide that researchers could refer to throughout their research. To this end the revised Code maintains a principles and values based approach, with the additional focus on the principles being applied from a personal responsibility perspective; from individual responsibilities, responsibilities throughout the research lifecycle, and institutional responsibilities.

9. In order to ensure that the new Code was reflective of all researcher roles and research activities across all the different fields, a UCL-wide consultation on the draft of the new Code of Conduct for Research was launched in the summer of 2021, and was open to all UCL staff and students until September. The consultation survey received responses covering all faculties, and included academics, students, members of professional services and technical staff.

10. The survey revealed that the majority of the respondents were positive and indicated that the structure of the new Code was clear and easy to follow and the research roles and the expectations set out for them were clear and relevant. A number of points required further clarifications, including expanding definition of 'researcher' to make the connection for professional services and technical staff clearer, and these are updated prior to the Code being approved by the Research, Innovation and Global Engagement Committee in July 2022.

11. The new Code will be published in the academic year 2022/2023 and will be openly available on the UCL website.

Increased support and guidance for declaring and managing conflicts of interest

12. UCL's current Disclosure of Conflict and Declaration of Interest Policy was published in August 2020 after consultation across the university. The policy is supported by an electronic reporting system designed to enable ease of reporting, while the introduction of new online mandatory training for staff has helped to raise awareness of the policy. www.ucl.ac.uk/enterprise/about/governance-and-policies/ucl-disclosure-conflict-and-declaration-interest-policy

13. In addition, a new process for managing conflicts of interest was developed within the policy, ensuring the use of conflict management plans to mitigate conflicts and protect the integrity of the conflicted individual, their research, and UCL at large.

14. This approach helps to ensure that open conversations on the scope and potential impact of conflicts are had at a local level in order to come to an agreement on how best to manage any conflict. It supports and enables meaningful conversations to take place at an early stage, allowing for mitigations to be put in place.

15. Following the publication of the policy and implementation of the new system, the Innovation & Enterprise team (I&E) have engaged with Head of Departments and wider staff to better understand their experiences implementing the policy and using the system. Such consultation enabled I&E to build upon and share existing good practices, as well as to gather lessons that could be learned towards improving usability and providing appropriate, practical support for staff disclosing and managing conflicts.

16. This collaborative approach has enabled additional guidance to be created, including templates for conflict manage plans that will serve as a central resource

for the whole institution. There is also a dedicated email address to enable staff to obtain advice if they have further queries. The guidance document and templates are due to be published openly on the Disclosure of Conflict and Declaration of Interest section of the Innovation & Enterprise website in early December 2022. www.ucl.ac.uk/enterprise/about/governance-and-policies/ucl-disclosure-conflict-and-declaration-interest-policy

17. These conversations have had a notable positive impact on the dialogue around conflicts of interest, enabling good practice to become more embedded into everyday activities through the use of open, collaborative discussions on managing conflicts. This includes extending discussions around the policy relating to non-research specific conflicts of interests, such as around procurement.

18. As part of embedding lessons learned to ensure continuous improvement (Commitment 5), the current policy is due to be reviewed and revised in the academic year 2023-2024. This review will enable UCL to build in practical updates to further improve support for individuals identifying and managing conflicts of interest, ensuring the highest levels of integrity across the university.

Introduction to Research Integrity – New online programme

19. UCL continues to take a broad view regarding the scope of training required to support research integrity, focussing not just on research integrity itself (what it is, why it is important and how it impacts upon research), but equally the relevant methods and skills to support and enable researchers to be able to undertake their research to the highest standards.

20. This is encapsulated in the Research Integrity Training Framework which incorporates this broad scope; considering training from a perspective of what would be required for a research project to be said to have integrity, and therefore the knowledge and skills researchers would need to have to ensure the research in conducted to the highest standards and has integrity. www.ucl.ac.uk/research/integrity/research-integrity-trainingframework

21. For a number of years training has been offered for postdoctoral students on research integrity, originally in person and then extended into a three-week online programme covering research integrity, research ethics (human and animal), data protection, research data management, research IT, and open access and copyright.

22. Over the past year work has been underway on the creation of a new online self-paced research integrity training programme for staff and students across all disciplines.

23. This new course will complement the existing training opportunities and provide a more in-depth look at what research integrity means for research and researchers, and how this can be applied across the research lifecycle.

24. It is planned to launch the training next academic year in two phases. Phase one, due for publication early 2023, and will contain three modules and focus on what research integrity means for research and researchers, UCL's expectations and how to lead by example. Phase two will provide an in-depth look at applying research integrity and the integrity principles throughout the research lifecycle, from research design, funding, ethics, data management, dissemination, peer review to competing interests. There will also be case studies and examples of

dilemmas to engage learners with different real scenarios and to think through how to approach each using the principles.

Training on Transparency in Research

25. In 2021 the online training course Transparency and reproducibility in research was launched on UCLeXtend. www.ucl.ac.uk/research/strategy-and-policy/research-transparency

26. The course fits alongside the UCL Statement of Transparency in Research and was designed to support researchers in understanding the steps required to make their research transparency and where appropriate, reproducible, and the limitations on doing so. Though aimed primarily at early-career researchers, the course is relevant to researcher at all stages, and requires around 3-5 hours to complete. Learners are provided with a digital badge microcredential upon completion.

Open Science – A practical guide for PhD researchers

27. Towards the end of the reporting year, the UCL Office for Open Science and Scholarship published a new guidance document for PhD researchers on open science, entitled 'Open Science – A practical guide for PhD researchers'

28. Developed from the original guide which was published by the French Ministry of Higher Education and Research, the guide is openly available via the UCL Research Data Repository (https://doi.org/10.5522/04/20585898) and was designed especially for UCL's community of PhD students to further promote and embed the principles of open science by;

    – Introducing them to the principles of Open Science,

    – Linking the principles directly to stages of the PhD journey

    – highlighting the benefits of embracing Open from the start.

29. In addition, a video, *Introduction to Open Science at UCL* was produced as a training and guidance tool to highlight open science at UCL and explain the 8 pillars. www.ucl.ac.uk/library/open-science-research-support/open-science/training-and-support.

Improving Research Compliance and Assurance (Commitment 2)

30. In Autumn 2021 as part of the Research and Innovation Support Transformer (RIST), a Compliance and Assurance workstream was established to enhance UCL's approach to research and innovation compliance and assurance. Work focussed on the following projects and was supported by two working groups comprising a collaboration of colleagues from RIST, Research & Innovation Services (RIS) and other Professional Services teams, VP offices, and Faculties.

Third Party Due Diligence

31. Work to establish a new overarching due diligence framework for research and innovation activity commenced to enhance identification and management of risk associated with engaging with new third-party organisations (UK and overseas partners, funders, and other external organisations). This work built on the current UCL due diligence process for partners in Low- and Middle-Income Countries (LMIC).

32. As part of this work, in August 2022, RIS soft launched a Due Diligence Stage One process for all new industry organisations (UK and overseas), which now undergo a standardised due diligence assessment at the onboarding stage. This assessment is carried out by a team in RIS which provides advice and support for researchers and academic departments for the mitigation and management of risks where these are identified.

National Security and Benefit Sharing

33. Throughout this academic year work was undertaken to enhance guidance, processes and controls to support compliance relating to Export Controls (export of items such as goods, software and data overseas), the National Security and Investment Act 2021 (NSI Act) and Access and Benefit Sharing (how genetic resources and the benefits that result from their use are shared between those providing and using such resources).

34. The National Security and Benefits Sharing project team (a collaboration between staff from RIST, RIS, Legal Services and Research Integrity) developed and launched new web pages relating to Export Controls (www.ucl.ac.uk/research-innovation-services/node/1368) and the NSI Act (www.ucl.ac.uk/research-innovation-services/node/1369) providing clear information and guidance for researchers and academic departments, as well as access to training on export controls. In addition, a support specific email address (ec.nsi@ucl.ac.uk) was established to better enable a direct advice and support route for UCL staff.

35. In April 2022 a new process for export controls was launched within RIS providing a dedicated review route to determine where export control licenses would be required, as well as support for obtaining licenses. To further support researchers and compliance, and to raise awareness of the support available and roles and responsibilities, in the Summer Term export controls training sessions were rolled out and all UCL academic departments and impacted Professional Services teams notified.

Stakeholder engagement

36. To ensure a joined-up approach and reduce the potential for duplication, professional service and academic stakeholder engagement was a key part of the projects. As an example, a walk-through of the new due diligence process was arranged for researchers and departmental staff to demonstrate the new process and to gather feedback on usability. Additional UCL-wide engagement is planned for the next academic year and will include both academic and professional service areas.

New Compliance and Assurance Team within RIS

37. In addition, work commenced on the creation of a new dedicated Compliance and Assurance team within RIS with responsibility for operating the enhanced UCL due diligence framework and the enhanced processes to support compliance with export controls, the NSI Act and Access and Benefit Sharing regulations, as well as other key international risk areas.

Expansion of ethical review

38. Following on from the establishment of the Research Ethics Strategy Board (RESB), a UCL in 2020-2021, work has continued towards the establishment of a devolved ethical review system for low-risk research (to be supported by a new application and management system) with the RESB receiving and considering applications to establish a Local Research Ethics Committee (LRECs).

39. To enable this, additional resources were provided to support the process of ethical review. To this end, the Research Integrity and Ethics team was divided into two new teams: Research Integrity (policy and strategy) and Research Ethics Service (operational). In addition, two new posts were recruited in August to the Research Ethics Service team to provide additional resource: Head of Research Ethics Service and Senior Research Ethics Facilitator.

Research Misconduct

40. The UCL procedure for investigating and resolving allegations of misconduct in academic research is heavily based on the UK Research Integrity Office (UKRIO)'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. The version of the UCL procedure for investigating and resolving allegations of misconduct in academic research (the "procedure") that was in place in 2021-22 was implemented on 1 August 2021. It can be accessed via the UCL website at: www.ucl.ac.uk/governance-compliance/sites/governance_compliance/files/research-misconduct-procedure-aug-2021.pdf.

41. The revisions made to UCL's procedure for allegations received from 1 August 2021 onwards include:

   – the establishment of a Research Misconduct Committee to consider cases referred for screening, consisting of trained members drawn from across all UCL Faculties, to be supplemented by co-opted members as required;

   – the adoption of 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;

   – 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).

42. UKRIO issued its revised draft model procedure for consultation in April 2022 and an institutional response was co-ordinated and submitted on behalf of UCL to this exercise. Once the final version is launched during 2022-23 session, it is

intended that a review be undertaken by the Named Person to determine the further changes to be made to the UCL version.

43. The Research Misconduct Committee (initially called the Research Misconduct Allegations Screening Panel Committee) screening committee was set up in June 2021 to expedite the screening stage of UCL's process and has proved to be very successful in its first full year of operation. It is supported by an advisory team consisting of colleagues from UCL's Governance Team, Human Resources and Legal Services. Details of its membership can be found at: https://www.ucl.ac.uk/governance-compliance/research-governance/research-misconduct-committee.

44. The committee met five times in 2021-22 (including two training sessions) and members have received training on their role and the procedure and ensuring fair treatment, as well as a training session covering the wellbeing of participants. The committee also made some revisions to its Terms of Reference to include oversight of all stages of the procedure to include decisions made by the Named Person at the Initial Assessment stage and at the Formal Investigation stage. This would allow for increased governance of all stages of the process. The committee has also provided screening panels constituted from its membership to consider any allegations referred for screening in 2021-22 and they were able to complete their work well within the required timescale.

45. UCL is also keen to ensure that its scientific record is correct. While it is considered that UCL should publish information where it has requested retractions of publications following a misconduct verdict at the formal investigation stage, discussions continue on the feasibility of doing this.

Lessons learned

46. 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. It is intended that the Research Misconduct 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.

47. 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

48. One case was carried forward from 2020-21 that was referred for formal investigation has completed its work. It was determined that the allegation was upheld in part and research misconduct was determined to have been found partly proven. The recommendations arising from the case were followed up as necessary that included seeking corrections and/or retractions be made to the

papers in question to ensure the scientific record is correct by the journals concerned. Two further cases have been referred for formal investigation in 2021-22 and will complete in 2022-23.