

# Compliance with the Concordat to Support Research Integrity 2014 Annual Statement to Research Committee and Council

The University of Oxford has a reputation worldwide for the range and excellence of its research and for the calibre of its researchers. Underpinning the quality of its research activity is a commitment to the highest standards of research integrity. The University's Academic Integrity in Research: Code of Conduct<sup>1</sup> states that its staff and students are expected to observe the highest standards in the conduct of their research. One of th e commitments expressed in the University's Strategic Plan (2013-18) is 'To maintain originality, significance and rigour in research within a framework of the highest standards of infrastructure, training, and integrity'. The University therefore fully supports and is committed to upholding the principles of good practice outlined within the Concordat to Support Research Integrity<sup>3</sup> and meeting the expectations outlined in the Concordat for both research institutions and individual researchers.

This statement was prepared for Research Committee and Council to summarise how the University currently ensures compliance with the terms of the Concordat and what further measures are planned to consolidate and enhance efforts in this area.

#### 1. Governance and oversight of research integrity

The University's Research Committee<sup>4</sup> (chaired by the Pro-Vice-Chancellor for Research, and which reports directly to Council) has central responsibility, inter alia, for advising on policies which promote research integrity (also termed good practice in research). Its members include senior academic representatives from all the Academic Divisions and from Colleges, as well as student representatives.

The Research Committee is supported by officers in Research Services and considers related developments and policy updates. The Senior Assistant Registrar, Research Services (Ethics and Integrity). acts on a day-to-day basis as the named contact point for anyone within or outside the University with queries about research integrity, or concerns about research at the University.

#### i) Research involving human participants and personal data

The University's policy on the ethical conduct of research involving human participants and personal data requires that all such research be subject to appropriate review. The Central University Research Ethics Committee (CUREC) which reports to the University's Research Committee has overall responsibility for the implementation and development of this policy. A review of the policy, last updated in 2011, is planned for 2015.

In the case of clinical trials or research involving National Health Service (NHS) patients, this ethical review and approval must be provided via the NHS Research Ethics Committees (further information is available at http://www.hra.nhs.uk/research-community/). Dedicated support is provided to clinical researchers through Research Services' Clinical Trials and Research Governance Team (CTRG). CTRG is responsible for: helping to ensure that all the University sponsored (i.e. the University is acting as study sponsor from a research governance/legal rather than funder perspective) clinical research is compliant with relevant legislation; providing advice, support, guidance and training on all aspects of the relevant legislation; on the basis of risk analyses, determining whether the University will act as sponsor for a trial or study; Good Clinical Practice monitoring and auditing trials on a risk-assessed. More information about CTRG is available at http://www.admin.ox.ac.uk/researchsupport/ctrg/.

<sup>&</sup>lt;sup>1</sup> http://www.admin.ox.ac.uk/personnel/cops/researchintegrity/.

<sup>&</sup>lt;sup>3</sup> The Concordat to Support Research Integrity

<sup>&</sup>lt;sup>4</sup> Terms of reference at http://www.admin.ox.ac.uk/statutes/regulations/520-122z.shtml.

For other University research involving human participants and personal data, ethical review must be sought from CUREC. CUREC delegates responsibility for the review and approval of such research to three subcommittees: the Medical Sciences Interdivisional Research Ethics Committee (MS IDREC); the Oxford Tropical Research Ethics Committee (OXTREC); the Social Sciences and Humanities Interdivisional Research Ethics Committee (SSH IDREC) which in turn works with twelve Departmental Research Ethics Committees (DRECs) to manage this process. Further information about CUREC, its sub-committees and its ethical review procedures is available from http://www.admin.ox.ac.uk/curec/.

# ii) Research involving animals

All animal research within the University of Oxford is governed and controlled under the Animals [Scientific Procedures] Act 1986 Amended Regulations 2012. The University also complies with:

- The Guidance on the Operation of the Animals [Scientific Procedures] Act 1986 (published March 2014).
- Code of Practice for the Housing and Care of ANIMALS Bred, Supplied or Used for Scientific Purposes.

The Registrar of the University is the Establishment Licence Holder under the Act and he is supported by two Named Veterinary Surgeons (NVS), a team of four veterinary clinicians, 15 Named Animal Care and Welfare Officers (NACWO), a Named Training and Competency Officer (NTCO) and a Named Information Officer (NIO).

The University has five Animal Welfare and Ethical Review Bodies (AWERBS) operating across the University which each meet four to five times a year to consider Project Licence applications as well as maintaining an overview of compliance and the implementation of the 3Rs (Replacement, Reduction and Refinement).

The University also has a 3Rs Committee responsible for collating best practice within the research environment and communicating that to all researchers through its monthly Newsletter and termly Departmental Animal Welfare meetings attended by all Project and Personal Licensees.

#### iii) Conflict of Interest

The University's Conflict of Interest policy states that all 'staff and students are required to recognise and disclose activities that might give rise to conflicts of interest or the perception of conflicts and to ensure that such conflicts are seen to be properly managed or avoided'. The policy sets out when a disclosure of conflict of interest should be made and also provides illustrative examples of situations which might give rise to conflicts of interest in relation to financial interests, research, student supervision and teaching.

The University's Conflict of Interest Committee<sup>5</sup> (which reports to the University's General Purposes Committee) is responsible for monitoring this policy and ensuring that there are appropriate systems in place to promote and monitor related compliance.

# iv) <u>Training/development for researchers</u>

The University Skills Group is responsible for advising the University through the Education Committee Graduate Panel on the overall strategy for skills training and other professional development for graduate students and postdoctoral researchers. It provides a single point within the University for reviewing, assessing and reporting (internally and externally) on the provision of skills training and other professional development opportunities for all early career researchers. It receives reports on the uptake of online research integrity training and on other research integrity training provided by the University's Academic Divisions.

<sup>&</sup>lt;sup>5</sup> Terms of reference at http://www.admin.ox.ac.uk/statutes/regulations/520-122ff.shtml.

# 2. Policies and procedures for supporting and promoting research integrity

The University's Academic Integrity in Research: Code of Practice and Procedure sets out the University's expectations and standards for research conduct for all its staff, students and anyone using the University's premises, facilities or funding for their research. This document also includes the University's definition of misconduct in research and the procedure which will apply in the event of suspected misconduct in research. This Code of Practice and Procedure was reviewed, updated and approved by Council in July 2014 (following extensive consultation, and discussion by the University's Research Committee in 2014).

The Code of Practice states that this operates in conjunction with a range of other policies relating to research integrity. These include:

- Policy on the ethical conduct of research involving human participants and personal data http://www.admin.ox.ac.uk/curec/about/policy/
- Policy on the use of animals in scientific research http://www.ox.ac.uk/news-and-events/animal-research/university-policy-on-the-use-of-animals-in-scientific-research
- Policy and procedure on conflict of interest http://www.admin.ox.ac.uk/researchsupport/integrity/conflict/policy/
- Policy on the Management of Research Data and Records http://researchdata.ox.ac.uk/university-of-oxford-policy-on-the-management-of-research-data-and-records/
- Financial Regulations http://www.admin.ox.ac.uk/finance/financialregulations/
- University statement of health and safety policy http://www.admin.ox.ac.uk/safety/hs-mgement-policy/univpolicy/
- Intellectual property policy http://www.admin.ox.ac.uk/statutes/790-121.shtml#\_Toc28143157
- Bribery and Fraud policy http://www.admin.ox.ac.uk/councilsec/compliance/briberyfraud/briberyfraudpolicy/
- Information Security Policy
- University Policy on Data Protection http://www.admin.ox.ac.uk/councilsec/compliance/dataprotection/policy/
- Data Quality and Assurance Policy http://www.admin.ox.ac.uk/pras/aboutus/data\_quality/

These are subject to periodic review to reflect changes in legislation, regulatory and funder requirements as well as evolving research practice.

# 3. Supporting and strengthening understanding and application of research integrity issues (for example postgraduate and researcher training, or process reviews)

The Research Services Integrity and Ethics website<sup>6</sup> provides a single reference point and guidance for researchers and administrators, with links to related University policies, guidelines, procedures and training materials that are intended to promote research integrity. This site is overseen by the Senior Assistant Registrar, Research Services (Ethics and Integrity).

i) Employment/student contracts

Research integrity-related policies are disseminated to staff in a range of ways; reference to the relevant Codes of Practice and Procedure is included within employment contracts and the staff handbook (for staff) and via the student contract and student handbooks (for student researchers).

<sup>&</sup>lt;sup>6</sup> Available at http://www.admin.ox.ac.uk/researchsupport/integrity/.

#### ii) Research integrity literature

The University's brochure, entitled `Research Integrity: an introduction to the responsible conduct of research' was first published in 2012. This leaflet includes a foreword from Professor Ian Walmsley, Pro-Vice-C hancellor (Research), and has been designed to provide University researchers with an introduction to what is meant by good practice in research, together with information about related resources available to support researchers and students. This is widely distributed to new researchers and students by departments, faculties and Doctoral Training Centres, including at induction and related training events. It is also on display and available for distribution in many University departments, helping to maintain staff awareness of related issues. A review and update of this brochure is planned for 2015.

#### iii) Induction

The Oxford Learning Institute runs a series of induction events on behalf of the University which include:

- a half-day `Welcome event for new researchers' to which all new research staff are invited (held three
  times a year). These sessions include presentations from Research Services and Personnel
  Services, as well as about other areas of professional development (such as from IT Services, the
  Bodleian Libraries, etc.). These provide researchers with an introduction to a wide range of training
  opportunities (including research skills as well as personal development skills). At these sessions,
  research integrity-related policies are also highlighted.
- Introduction to Academic Practice at Oxford'8 a three-day training programme for new members of academic staff. As part of this programme, participants are introduced to the research environment, DPhil supervision, and to policy and management in the University. The programme as a whole is a forum that provides the opportunity for critical discussion, sharing of experience, research, and dissemination of knowledge of the University, research and the research funding landscape.

Individual departments, faculties and Centres for Doctoral Training also offer researchers and research students a programme of induction during their first few months in post. Information about research integrity and related policies is included as part of this induction.

Students are also referred to the Graduate Handbook, or individual departmental research student handbooks, which include information about good practice in research and local initiatives to support and promote this. Many departments also include information about related policies via dedicated `research' pages on their individual websites.

#### iv) Research supervision

Supervisors are expected to discuss research integrity or good practice in research with their students. To assist with this, a research integrity checklist is available which offers advice and guidance to research supervisors and students about research integrity matters which should be addressed at the start of (and throughout) a research project.

The aim of the checklist is to help staff and students not only to abide by the principles set out in the Academic Integrity in Research: Code of Practice and Procedure but also to engage in a broader dialogue about research integrity and the responsible conduct of research. Further information and guidance about research supervision at Oxford for both supervisors and research students is available from the Oxford Learning Institute's `Research Supervision' website.

<sup>&</sup>lt;sup>8</sup> http://www.learning.ox.ac.uk/support/teaching/programmes/iapo/.

<sup>&</sup>lt;sup>9</sup> http://www.admin.ox.ac.uk/researchsupport/integrity - right-hand link.

#### v) Training

In 2013, the University introduced a range of interactive online training courses in research integrity for research staff and students<sup>11</sup>. These were bought from the company Epigeum Limited and have been designed to provide an introduction to research integrity or the responsible conduct of research.

There are five different discipline-specific versions of the courses covering:

- Biomedical Sciences
- Natural and Physical Sciences
- Engineering and Technology
- Arts and Humanities
- Social and Behavioural Sciences

These are freely available to any University researcher or student and have been customized for the University so that they include links to Oxford-specific policies and procedures where these relate to research integrity. The courses are widely promoted (particularly at graduate induction events), including by the University's research ethics committees and the University's Divisional representatives coordinating the provision of training to research staff and students. Such training covers a wide range of subjects related to good practice in research.

In addition to the above online material, classroom-based research integrity-related seminars are organized by the University's Academic Divisions, departments and faculties, and the Centres for Doctoral Training. The range of related subjects covered includes:

- Research Integrity face-to-face courses for DPhil students and research staff (now being developed so that these build on and blend with specific topics in the online courses)
- Training in Good Clinical Practice (for researchers involved with clinical trials and studies) is offered by the Clinical Trials and Research Governance Team. This is available either via regular face-to-face sessions or as online training <sup>13</sup>
- A wide range of online and classroom-based courses covering research ethics (tailored according to research discipline), including how to submit an application for ethical review<sup>14</sup>
- Discipline-specific research methodology seminars, which also address ethical issues relevant to the particular field of research<sup>15</sup>
- Courses designed to support research students in planning and managing a DPhil (including working with a supervisor)
- Research Data Management: a variety of online and classroom-based courses are offered<sup>17</sup>
- Animal research: A[SP]A Modular training courses are offered, which see an annual throughput of around 300 delegates. In November 2014, the University received confirmation that its training had become the first in the UK to receive Federation of Laboratory Animal Science Associations (FELASA)

<sup>&</sup>lt;sup>11</sup> Available at https://weblearn.ox.ac.uk/portal/hierarchy/skills/ricourses

<sup>&</sup>lt;sup>13</sup> Further information available at http://www.admin.ox.ac.uk/researchsupport/ctrg/training/gcpoxford/

<sup>&</sup>lt;sup>14</sup> See http://www.admin.ox.ac.uk/curec/training/

<sup>&</sup>lt;sup>15</sup> See http://researchtraining.socsci.ox.ac.uk/about-training/what-courses-are-available

<sup>&</sup>lt;sup>17</sup> See http://blogs.it.ox.ac.uk/acit-rs-team/advice/rdmcourses/.

accreditation (meaning that this would be accepted across the EU as evidence of adequate training to work with animals).

In a University such as Oxford, with a very devolved academic and administrative structure, an ongoing challenge is to maintain a comprehensive overview of research integrity-related initiatives and training offered at local department or faculty level. In 2015, Research Services will work with the Research Committee, as well as Divisions, Departments, Faculties and Doctoral Training Centres to map current provision, and identify areas where this could be improved or promoted more effectively.

# vi) Staffing

In January 2014, a specialist research ethics and integrity team was established within Research Services to provide an enhanced and coordinated service for researchers in connection with research ethics matters and in particular for the work of the University's Interdivisional Research Ethics Committees (IDRECs). Part of this team's work has involved the development of an advisory and training service for researchers submitting applications for ethical review to the University's human research ethics committees. It also provides advice, support and training for departmental representatives with responsibility for running departmental research ethics committees.

This team works closely with the Central University Research Ethics Committee which in 2015 will be working on providing further training for all ethics committee members.

## vii) Process review

In 2014, the Social Sciences and Humanities IDREC and Central University Research Ethics Committee undertook a review of the ethical review and approval process required of researchers whose research involves human participants and personal data. This resulted in an update of the related checklists and application forms (last reviewed in 2010) for researchers in the social sciences and humanities. A similar review of the process for such research in the medical sciences (where ethical review and approval is provided by the University and not the NHS) and for research raising more complex ethical issues is planned for 2015.

## viii) Website development

In October 2014, the website of the Central University Research Ethics Committee was extensively revised and updated at http://www.admin.ox.ac.uk/curec/ and now includes additional resources for research staff and students whose research involves human participants and personal data. New features include: improved signposting about which ethical review process University researchers should use; enhanced guidance about informed consent in research; clearer advice about training opportunities available in research ethics for University researchers. This web site is used extensively by staff and students whose research involves human participants and data.

## ix) External engagement

The University recognises the importance of collaborating with partner institutions to facilitate networking and the sharing of good practice in how to support and promote research integrity.

#### a. Working groups

The University of Oxford was a founder member of two external working groups looking at research integrity and continues to be closely involved with the activities organised by these groups.

#### • Russell Group

The University is a core member of the Russell Group working group on research integrity, established in 2013, which seeks to share good practice and provide training and networking opportunities in research integrity matters. A representative from the University has presented at the two workshops organised by this group so far (*Research Integrity* (2013); *Training in research integrity* (2014)) and will participate in the next workshop to be held in 2015 (to be themed around handling allegations of research misconduct).

### • League of European Research Universities (LERU)

In October 2012, the University of Oxford organised and hosted a two-day forum on the theme of research integrity for the League of European Universities (LERU). Arising from this, Oxford (through the Director of Research Services and the Senior Assistant Registrar, Research Services (Ethics and Integrity)) have played a key role in establishing the LERU Research Integrity Expert Group in 2013 and convening its (virtual) meetings since then. This group has undertaken an analysis of research integrity policies and codes of practice across LERU universities and is developing a programme of themed workshops for member universities. The first of these, on the theme of handling allegations of misconduct in research, took place at the University of Utrecht in December 2014.

In 2014, three Oxford doctoral students also attended a LERU doctoral summer school (hosted by the University of Helsinki) on the theme of research integrity entitled `Research Integrity in a Complex Society'.

# b. UK Research Integrity Office

The University of Oxford has been a member of the UK Research Integrity Office (UK RIO) since 2012 (when UK RIO first launched its subscription service) and University representatives have attended all workshops and conferences organised to date by UK RIO.

#### c. Animal research

In 2013/2014 in addition to routine announced and unannounced inspections by the Home Office, the University also hosted visits to its animal facilities from:

- The Under Secretary of State responsible for A[SP]A (Lord Taylor)
- The RSPCA Research Animals Department
- The Chief Executive of the NC3Rs
- The Animals in Science Committee (ASC)
- The BBC's Medical Correspondent (a report of the visit was published on the Health Section of the BBC news website).

Activities planned for 2015 include the first Oxford 3Rs Research event where grant holders of NC3Rs funding will give presentations on their projects. In addition the University is planning a joint 3Rs Summer School in collaboration with the NC3Rs for DPhil students to learn more about the practical application of the 3Rs.

# 4. Handling allegations of misconduct in research

Commitment 4 of the Concordat requires the University to have in place transparent, robust and fair processes to deal with allegations of research misconduct should they arise. These processes are set out in the `Academic Integrity in Research: Code of Practice and Procedure', revised and updated in July 2014.

The Registrar (Professor Ewan McKendrick) is the senior officer within the University named within this Procedure, with responsibility for dealing with cases of misconduct. In cases of research misconduct which involve students, the Registrar may refer these to the University Proctors for further investigation (the Proctors having responsibility for the investigation of possible breaches of University disciplinary codes and bringing charges against students accused of infringing these codes). The Procedure sets out the processes which will apply when allegations of misconduct are made, including details of third parties which need to be kept informed, the timelines for any subsequent investigation of an allegation and suggestions for possible further action after an allegation has been considered.

The University's web page on research misconduct<sup>18</sup> encourages researchers and research staff students to discuss concerns about research and seek advice as appropriate, including at a local level, for example from: fellow students and colleagues; supervisors; mentors; Senior Tutors; Directors of Graduate Studies; Heads of Department; Research Services; UK Research Integrity Office.

<sup>&</sup>lt;sup>18</sup> Available at http://www.admin.ox.ac.uk/researchsupport/integrity/misconduct/

This web page also advises any external/third-parties (eg. representatives of research funders, research journals, professional bodies) who wish to raise concerns, in confidence, about the integrity of research at the University, to contact, in the first instance, the Senior Assistant Registrar, Research Services (Ethics and Integrity) (Kathryn Dally - Kathryn.dally@admin.ox.ac.uk).

# 5. Investigations of allegations of research misconduct undertaken in 2014

In 2014, the Registrar's Office received a number of allegations of misconduct in research which were considered under the procedures set out in the Academic Integrity in Research: Code of Practice and Procedure. These are summarised below.

No.	Nature of research misconduct	Outcome
1.	Allegation of plagiarism	Complaint dismissed; no evidence of plagiarism
2.	Allegation of falsification - knowingly erroneous statistical analysis	Complaint dismissed; scientific differences which should be resolved through usual channels of scientific discourse
3.	Allegation of plagiarism	Complaint dismissed; honest error not plagiarism. Error corrected.
4.	Allegation of falsification of data	Allegation upheld. Investigation was concluded prior to the public release of any of the data in question.
5.	Allegation of failure to attribute authorship	Investigation ongoing
6.	Allegation of passing off work of others without permission	Investigation ongoing

In 2014, the Proctors' Office received and investigated 17 cases of alleged misconduct in research (relating to examined work, i.e. in theses and dissertations) by students. Of these, 13 cases were allegations of plagiarism, two alleged re-use of the candidates' own material and two were allegations of theft/unauthorised publication of data. One case of plagiarism was upheld and referred to the Student Disciplinary Panel; the investigation into one allegation of plagiarism is ongoing. The remaining 15 allegations were not upheld.

Future annual statements will also include details of the outcomes of investigations concluded that year, if the allegation of misconduct in research was made in a previous year.

This statement was prepared and coordinated by Research Services, with contributions to specific sections provided by the Registrar's Office, the Proctors' Office, Biomedical Services, Personnel Services, the Oxford Learning Institute and the University's Academic Divisions. A draft of the statement was circulated to Associate Heads of Division for Research, Divisional Research Facilitators and Divisional Secretaries and their feedback was incorporated.

It was presented and discussed at a meeting of the University's Research Committee on 12 March 2015, and at University Council on 16 March 2015. Changes suggested at these meetings have been made to this final version of the statement.

24 March 2015