

Annual Research Integrity Statement – 2018

The Concordat to Support Research Integrity¹ recommends that an institution should provide a short annual (publicly available) statement 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.

This statement was therefore prepared for the University's Research and Innovation Committee² to summarise how the University of Oxford ensures compliance with the terms of the Concordat and meets the expectations outlined within this for both research institutions and individual researchers.

1. Supporting and strengthening understanding of research integrity

A summary of the University's policies and procedures for supporting and promoting research integrity is included as Annex A.

i. <u>Training and professional development offered</u>

There is a wide variety of training and other professional development available related to supporting good practice in research. This includes:

a. Online training

There are online discipline-specific training courses³ available in research integrity (licensed from the company Epigeum Limited, part of Oxford University Press) which provide an introduction to research integrity (or 'the responsible conduct of research'). A separate online Epigeum course in avoiding plagiarism is also available⁴, as is online accredited training in Good Clinical Practice⁵.

All of these courses are freely available to any University researcher or student and are widely promoted to researchers and students by Research Services, the University's ethics committees, departments, faculties and Doctoral Training Centres, including at induction and related training events.

¹http://www.universitiesuk.ac.uk/highereducation/Documents/2012/TheConcordatToSupportResearchIntegrity.pdf

² As set out in Council Regulations 15 of 2002 (http://www.admin.ox.ac.uk/statutes/regulations/520-122z.shtml), Research and Innovation Committee has delegated authority to "approve on behalf of Council the annual statement of compliance with the national Concordat to Support Research Integrity".

³ https://weblearn.ox.ac.uk/portal/hierarchy/skills/ricourses

⁴ https://weblearn.ox.ac.uk/portal/site/:skills:generic:avoidplag

⁵ https://researchsupport.admin.ox.ac.uk/ctrg/training/gcp-online

A wider range of online skills training (i.e. including business, technology and creative skills) is also available to all University researchers and students via the University's subscription to https://www.lynda.com/.

b. In-person training

In addition to online provision, there is a wide variety of in-person training and other professional development available broadly related to research integrity (eg. Good Clinical Practice (GCP), human research ethics, animal research ethics, research data management, research methodology, research skills training) organised and delivered by the University's Academic Divisions, Departments and Faculties, Doctoral Training Centres, the Oxford Learning Institute and Research Services.

Some highlighted examples from 2018 include:

- The Medical Sciences Division's pilot of a new approach to providing research integrity training for new research students, through a programme of seminars run throughout autumn 2018 covering:
- Research planning, research design and protocol
- Experimental design in research
- Misconduct in science (and how to avoid it)
- Designing reproducible research in the clinical sciences
- Statistical thinking
- Writing and publishing research papers

Building on the success of this pilot, the intention is that these seminars will be repeated in 2019 and for attendance to be compulsory for research students.

- The Chief Executive of the UK Research Integrity Office (UKRIO) visited Oxford in June 2018 to run a well-attended interactive training workshop for research staff and students on good practice in publication and authorship.
- The Oxford Learning Institute offered programmes tailored to those managing and leading research teams, including Principal Investigators (PIs). These target those who deputise for their PI as well as PIs themselves, emphasising the role that astute management and leadership has on research productivity and on the development of a new generation of researchers. The Institute has also developed a workshop aimed at those who want to become PIs which provides insights into the role of the PI, including their role as staff developers. This workshop is now run by divisional trainers who can tailor it to their audience. During the year, 153 researchers attended these programmes, which are run centrally as well as within departments. This year, the Institute also introduced a mentorand coach-matching initiative to support departmental approaches to mentoring and coaching.

2. Reviews of policy, processes and guidance

i. <u>Academic Integrity in Research: Code of Practice and Procedure</u>

This Code (last updated in 2014) 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. The Code also provides the University's definition of misconduct in research and sets out the procedure which will apply in the event of suspected misconduct in research.

A small working party convened by Research Services, including representation from the Registrar's Office, Legal Services and the Proctors' Office worked on a review and update of the Code of Practice and Procedure in 2018. The updated document now includes more details about how allegations of research misconduct will be assessed, particularly at the preliminary review stage, the people (including external third parties) who may need to be kept informed, the timelines for any subsequent investigation of an allegation and further details about what further action might be necessary after an allegation has been considered. The updated procedure includes a revised and clearer definition of `misconduct in research', in an attempt to clarify what behaviours may require consideration under this Procedure. It also now allows for the possibility that anonymous allegations may be considered under the Procedure, depending on the seriousness of the allegation, its credibility, and the feasibility of confirming the allegation with credible sources.

The revised Code was discussed and approved by Research and Innovation Committee at its meeting on 7 June 2018¹.

ii. Human research ethics committees

In 2018, the Central University Research Ethics Committee (CUREC) approved:

- a new and streamlined process for the ethical approval of research involving licensed drugs (such that this no longer requires additional scrutiny by the Clinical Trials and Research Governance team);
- amendments to the Oxford Tropical Research Ethics Committee (OxTREC) end-of-study reporting
 process to include mandatory sections on clinical trial registration and summary results posting. This
 also reflected the Wellcome Trust's 2018 update to its guidelines on good research practice,
 requiring that (a) all clinical trials must be registered on ClinicalTrials.gov, the ISRCTN registry, or
 another register listed on the WHO International Clinical Trials Registry Platform; and (b) the
 summary results from clinical trials must be made publicly available within 12 months of the primary
 study completion date;
- new recommended guidance to assist researchers whose research involves UK adult prisoners;
- a new process to allow for block applications to be submitted from student courses (which might entail work involving human participants and/or personal data) which are largely taught and where the research element is limited and low-risk;
- ongoing work, in consultation with the Social Sciences and Humanities Inter-divisional Research Ethics Committee, to develop guidance for research conducted overseas and how best to approach the ethical review and approval of such research. This will be designed to address the challenges presented by large-scale international collaborations involving multiple partners (eg. those funded by the European Research Council or via the Global Challenges Research Fund), but will also reflect the principles set out in the new `Global Conduct of Research in Resource-Poor Settings'².

The University's policy on the ethical conduct of research involving human participants and personal data is scheduled for review and update in 2019.

ii. <u>Clinical Trials and Research Governance (CTRG)</u>

- CTRG provided sponsorship for 171 new clinical research studies in 2018, of which 50 were interventional; 23 Clinical Trials of Investigational Medicinal Products (CTIMP).

¹ http://www.admin.ox.ac.uk/personnel/cops/researchintegrity/

² http://www.globalcodeofconduct.org/

- In 2018, a specialist Quality Assurance unit was established with a focus on audit and compliance of Clinical Trials. They also support the development of core Standard Operating Procedures and quality management systems for use across the University.
- In October 2018, the House of Commons Science and Technology Committee's report entitled `Research integrity: clinical trials transparency¹' was published, recommending greater transparency in the way that clinical trials are registered and reported. A full audit of all CTIMP sponsored by the University, where reporting of results is due, has been undertaken and CTRG is developing strategies to ensure that the results of interventional trials are published in a timely manner.

iii. General Data Protection Regulation (GDPR)/Data Protection Act (DPA) 2018

Extensive work was undertaken across the University in preparation for the introduction of the GDPR and DPA in 2018. For research, this included:

- updating all (1300+) current University-sponsored clinical studies to comply with the GDPR/DPA.
- extensive changes to the forms and processes used by CUREC to ensure compliance with the GDPR/DPA 2018 and providing new guidance for researchers around Data Protection and Research².
- ongoing collaborative work between Research Services (via the Clinical Trials and Research Governance team, and Research Ethics and Integrity team), IT Services and the Information Compliance Team to support and advise researchers on data protection issues raised by the implementation of the GDPR/DPA. This included ensuring that all new research studies involving personal data were compliant, as well as assisting with responses to requests for related compliance information from research funders.

iv. Research Data Management

IT Services, the Bodleian Libraries, Research Services, and the Information Security Team continued to work closely together to provide advice and support to researchers regarding research data management.

Activities included:

- offering a single point of contact for researchers to request advice and support on a range of issues, for example when formulating a research data management plan (often required as part of a research funding proposal), how to protect confidential data, setting up secure collaborative projects, and preparing data for publication and long-term archiving;
- courses delivered termly via the IT Learning Centre and iSkills programme, and on request for departments and research groups;
- new training and briefings introduced for librarians and research support staff;
- maintaining the Research Data Oxford³ website, a central source of information, advice, and details
 of resources relevant to research data management; work is now ongoing to overhaul and
 comprehensively update the site and migrate it to a new platform;

¹ https://publications.parliament.uk/pa/cm201719/cmselect/cmsctech/1480/1480.pdf

² https://researchsupport.admin.ox.ac.uk/policy/data

³ http://researchdata.ox.ac.uk/

- drafting of (and consultation around) a revised University policy on the management of data supporting research outputs². Last updated in 2012, the new policy was discussed and approved by the Research and Innovation Committee at its meeting in December 2018¹.

In 2018, IT Services worked on a number of projects to help researchers manage their data more effectively:

- Migration to Nexus365² provided University members with access to OneDrive: a simple large active storage service that will help researchers store and share data (rolled out across the University during 2018);
- The LabArchives electronic laboratory notebook service³ provides a highly secure collaboration environment for research laboratories to maintain online laboratory notebooks, protecting the provenance of ideas in case of patent defence or publishing disputes (launched in June 2018);
- The Research File Service (RFS) project⁴ aims to provide very large storage for data intensive research projects (due to be launched in autumn 2019);
- The Digital Humanities Sustainability project is exploring the possibility of delivering a pilot collection management solution for humanities research data (scoping and analysis phase due to conclude by mid-2019).

Plans were also set in motion for a review of research data management support in Oxford. This will be conducted in 2019, and will look at the adequacy of current provision, user requirements, and governance.

v. Research involving animals

The Committee on Animal Care and Ethical Review produced a comprehensive annual report to Council for 2017-18, summarising the work of the Committee, its six Animal Welfare and Ethical Review Bodies and a further sub-committee, as well as training and public engagement work undertaken. This report also covered the support measures in place to ensure compliance with the Animals (Scientific Procedures) Act 1986, revised in 2012 and commonly referred to as A(SP)A, and the requirements of the Home Office Animals in Science Regulation Unit. The report was published (and is available online without restrictions) in the *University Gazette* of 6 December 2018 (pp172-176)⁵.

vi. Researcher Development

The new University-wide Researcher Development Forum, established in late 2017, met termly. Its aim is to contribute to an overall strategy for the University to underpin the professional and career development of research staff. It provides a single point within the University for communication (internally and externally) on career and professional development for research staff and advise Research and Innovation Committee on matters relating to the career and professional development of research staff. It will also offer advice and appropriate input to the REF environment requirements as agreed with Research and Innovation Committee, with reference to researcher development issues at Oxford.

Professor David Gavaghan from the Department of Computer Science was appointed as the first University Advocate for Research Staff Development. This new post, which will work in support of the priority in the

¹ http://researchdata.ox.ac.uk/university-of-oxford-policy-on-the-management-of-data-supporting-research-outputs/

² https://help.it.ox.ac.uk/nexus365/

³ https://help.it.ox.ac.uk/research/eln/

⁴ https://www.it.ox.ac.uk/project-portfolio/research-file-service

⁵ https://gazette.web.ox.ac.uk/files/6december2018-no5225redactedpdf

University Strategic Plan 2018-2023 around early-career researchers and research staff, follows the recommendation of the Research and Innovation Committee and interviews held at the end of 2018.

vii. <u>Conflict of interest</u>

The Conflict of Interest Committee has continued to monitor the University's Policy on Conflict of Interest, to make recommendations, and to oversee the development of appropriate systems to promote and monitor compliance with the Policy. The focus of the Committee's work has been on outside appointments and research commercialisation, and the need to ensure that potential conflicts are recognised and managed in these areas. In particular, a project is underway to work with targeted staff and departments developing spin out companies, to help manage associated conflicts of interest. A number of workshops and information sessions have been held in order to share best practice and to identify areas where further work might be required. The internal auditors have also completed a follow-up review into the University's management of conflicts of interest, noting where progress has been made since 2016, and making a number of recommendations for next steps.

viii. Research involving human tissue

In 2018, the University's Human Tissue Governance Team for Human Tissue Authority Licence 12217 (the largest research licence in the University) continued to support research with human tissue and compliance with the Human Tissue Act 2004. In particular, significant investment has been made by the Medical Sciences Division to introduce a new quality management system for the Licence; thus strengthening the governance requirements. To support researchers working with human tissue the team provides bespoke support; expert advice; monthly drop-in clinics; related resources and University-wide training.

ix. External audit

a. RCUK (as was)

In January 2018, the University was audited by RCUK (as was), as part of RCUK's three-yearly Funding Assurance Programme (FAP) . The required pre-audit `Self-Assessment Questionnaire' requested information about the University's processes for governing good research practice and investigating unacceptable research conduct (as well as numbers of allegations of research misconduct made to the University in the past three years, where such research was supported by RCUK). The audit report noted the information provided by the University, with no further recommended actions.

b. Wellcome Trust

In June 2018, the University was audited by the Wellcome Trust and, for the first time, the audit covered areas related to good practice in research, including: assurances for ensuring that ethical considerations and approvals have been obtained prior to research starting; what training is in place for both students and research support staff around good research practice; policies and processes around completing laboratory notebooks (paper and electronic) and good data and record keeping; research misconduct reporting and investigation frameworks. The audit report noted the various University policies and frameworks in place and discussions with the auditors are ongoing as to what further actions might be appropriate to ensure compliance with Wellcome Trust expectations.

3. External engagement

The University recognises the importance of collaborating with partner institutions, at a national and international level, to facilitate networking and good practice in how to support and encourage research integrity.

i. Russell Group

The University's Research Ethics and Integrity Team continue to be closely involved with the activities of the Russell Group Research Integrity Forum, which seeks to share good practice and provide training, guidance and networking opportunities in research integrity matters. The Forum met twice in 2018: its meeting in April 2018 (held at the University of Birmingham) was a joint workshop run with representatives of the Committee on Publication Ethics (COPE); in October 2018, a meeting was held at University College London.

In 2018, the Russell Group Research Integrity Forum produced a `Statement of Cooperation' in respect of cross-institutional research misconduct allegations, which sets out the principles for the consideration and management of allegations of research misconduct that involve more than one institution. This has been published on the University's Research Integrity web page.¹

ii. <u>League of European Research Universities (LERU)</u>

The Senior Assistant Registrar (Ethics and Integrity) continued to work closely with the LERU Research Integrity Thematic Group, which met in Geneva in May 2018 and at Imperial College London in November 2018. The subject of the May meeting was promoting the responsible conduct of research in the era of open science; the December meeting focused on planning a 2019 workshop around good practice in handling and investigating allegations of misconduct in research.

iii. <u>UK Research Integrity Office (UKRIO)</u>

The University subscribes to UKRIO and was represented at the UKRIO annual conference in May 2018.

UKRIO provides the University with access to additional training assistance, UKRIO guidance documents, a register of UKRIO advisors for misconduct investigations, and assistance in developing and enhancing University guidelines, procedures and training. It also provides confidential advice and assistance to Oxford staff and research students with questions and concerns about the design, conduct and reporting of academic research.

iv. <u>Medicines and Healthcare products Regulatory Agency (MHRA)</u> / Health Research Authority (HRA)

The University through senior staff in its Clinical Trials and Research Governance team maintains active links with the MHRA and HRA. They are part of a sponsor reference group for the HRA and, through other meetings and requests, provide early feedback on developments they are considering.

¹ https://researchsupport.admin.ox.ac.uk/governance/integrity/misconduct

v. House of Commons Science and Technology Committee: Report into Research integrity

In July 2018, the House of Commons Science and Technology Committee published its report into Research integrity¹. The report makes a number of recommendations and arising from these, it is expected that a revised Concordat to Support Research Integrity will be published in 2019. It is anticipated that the new Concordat will raise the standards expected of Universities to demonstrate compliance.

4. Investigations of allegations of misconduct in research undertaken in 2018

Under the Academic Integrity in Research: Code of Practice and Procedure², the Registrar is the senior officer nominated within the University with responsibility for responding to allegations of misconduct in research. The Senior Assistant Registrar (Ethics and Integrity) is nominated as a contact point for those wishing to raise, in confidence, concerns about the conduct of University research, before any formal allegation is made³. In cases of allegations of misconduct in research which involve students, the Registrar may refer these allegations 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).

i. Allegations notified to the Registrar's Office

In 2018, the Registrar's Office received a number of allegations of misconduct in research, which were considered under the procedures set out in the above-referenced Code. These are summarised below and include details of three allegations which were received in 2017, but where the ensuing investigation was concluded in 2018. Although cases have necessarily been anonymised, the table also includes brief information about further action taken (even if there was no evidence of proven misconduct in research).

No	Nature of alleged research misconduct	Outcome
1.	Allegation of suppression of publication (received in 207)	No evidence of research misconduct, Complainant expressed a preference for the matter to be resolved through informal mediation within the department
2.	Allegation of plagiarism and conflict of interest in peer review. (received in 2017)	Complaint sent to the University by a research funder. Investigation in 2018 concluded that there was no evidence of research misconduct. Not upheld.

¹ https://publications.parliament.uk/pa/cm201719/cmselect/cmsctech/350/350.pdf

² https://www.admin.ox.ac.uk/personnel/cops/researchintegrity/

³ https://researchsupport.admin.ox.ac.uk/governance/integrity/misconduct

3.	Allegation of denial of authorship (received in 2017)	Complaint dismissed at the preliminary review stage.
	(received iii 2017)	
4.	Allegations of fabricated data in several journal papers.	Under panel investigation. Ongoing.
5.	Allegations concerning conduct of a study (and whether this was conducted within the scope of the ethical approval granted)	Complaint dismissed at the preliminary review stage
6.	Allegations of lack of appropriate acknowledgement and recognition of intellectual contribution in a published book.	Under panel investigation. Ongoing
7.	Allegation of denial of authorship	Referred to the department for further detailed investigation. No findings of misconduct but Head of Department agreed procedures with complainant and respondent on how to resolve and address complaint

ii. <u>Allegations considered by the Proctors' Office</u>

In 2018, the Proctors' Office investigated a number of student cases relating to <u>research</u> work submitted for examination (i.e. theses and dissertations, as well as extended 'research' projects / essays). These are summarised below (there were 2 'carry forward' cases from 2017).

Allegations that were upheld were referred either to the Academic Conduct Panel (ACP) or Student Disciplinary Panel (SDP). Those allegations which were not upheld were regarded, after investigation, as being cases which were unfounded or poor academic practice, rather than warranting a referral to the ACP or SDP. These cases were therefore returned to the examiners for finalising in the normal way (or the results stood if the award was already conferred).

No	Nature of allegation	Outcome
1	Plagiarism (from 2017)	Not upheld
2	Autoplagiarism (from 2017)	Upheld
3	Plagiarism	Upheld
4	Plagiarism	Upheld
5	Plagiarism	Not upheld
6	Plagiarism	Ongoing
7	Plagiarism	Not upheld
8	Plagiarism	Ongoing
9	Plagiarism	Not upheld
10	Plagiarism	Ongoing

The University's Research Ethics Committees, the Clinical Trials and Research Governance Team and the Senior Assistant Registrar (Ethics and Integrity) have all advised on the resolution of various additional concerns relating to research integrity which did not require assessment and investigation under the framework of the Academic Integrity in Research: Code of Practice and Procedure.

This statement was prepared and coordinated by Research Services, with contributions to specific sections provided by the Registrar's Office, the Proctors' Office, Council Secretariat, IT Services and the Oxford Learning Institute

This statement was discussed and approved at a meeting of the University's Research and Innovation Committee on 28 February 2019.

Annex A

Policies and procedures for supporting and promoting research integrity.

The University's Academic Integrity in Research: Code of Practice and Procedure (https://www.admin.ox.ac.uk/personnel/cops/researchintegrity/) (updated in 2018) 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 Code also includes the University's definition of misconduct in research and the procedure which will apply in the event of suspected misconduct in research. The Code 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 https://researchsupport.admin.ox.ac.uk/governance/ethics/committees/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 (updated in 2018)
 https://researchsupport.admin.ox.ac.uk/governance/integrity/conflict/policy
- Public interest disclosure (whistle-blowing) code of practice https://www.admin.ox.ac.uk/personnel/cops/pid/
- Policy on the management of data supporting research outputs (updated in 2018)
 http://researchdata.ox.ac.uk/university-of-oxford-policy-on-the-management-of-data-supporting-research-outputs/
- Open Access publications policy (updated in 2018)
 http://openaccess.ox.ac.uk/wp-content/uploads/sites/2/2018/03/University-of-Oxford-OA-Publications-Policy-01-03-2018.pdf
- Financial Regulations
 http://www.admin.ox.ac.uk/finance/financialregulations/
- University statement of health and safety policy (updated in 2018) http://www.admin.ox.ac.uk/safety/hs-mgement-policy/univpolicy/
- Intellectual property policy (updated in 2018) http://www.admin.ox.ac.uk/statutes/regulations/182-052.shtml
- Anti-bribery Policy
 https://www.admin.ox.ac.uk/councilsec/compliance/briberyfraud/anti-briberypolicy/
- Anti-fraud policy https://www.admin.ox.ac.uk/councilsec/compliance/briberyfraud/anti-fraudpolicy/
- Information Security policy http://www.it.ox.ac.uk/policies-and-guidelines/information-security-policy
- University policy on data protection (updated in 2018)
 https://www1.admin.ox.ac.uk/councilsec/compliance/gdpr/universitypolicyondataprotection/
- Export control guidance on export control legislation https://researchsupport.admin.ox.ac.uk/policy/export
- Safeguarding Code of Practice https://www.admin.ox.ac.uk/personnel/cops/safeguarding/safeguardingcop/

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

Links to a more comprehensive list of University research-related policies and procedures is available at https://researchsupport.admin.ox.ac.uk/policy/oxford.