

Summary of key points:

- The governance structure for ensuring compliance with the Concordat to Support Research Integrity will change in 2019/20 to ensure involvement on School and Departmental level instead of the previous top down approach.
- An internal audit of City's research ethics processes has been undertaken.
- The temporary suspension of face-to-face research involving human participants due to the Covid-19 pandemic.
- No formal investigations of allegations of misconduct in research have been undertaken.

1. Introduction

City, University of London is committed to ensuring continued compliance with the Concordat to Support Research Integrity and to support and embed a culture of research integrity.

The Concordat to Support Research Integrity “seeks to provide a national framework for good research conduct and its governance”. Universities UK developed the Concordat to Support Research Integrity with the funding and research councils, the Wellcome Trust and a number of government departments. It was launched on 11 July 2012. Compliance with the Concordat has been a prerequisite for receiving funding from the UK research councils and higher education funding councils since 2013.

In 2017/18, the House of Commons Science and Technology Committee conducted an inquiry into research integrity in the UK (the report was published on 11 July 2018). In response to the report, the signatories to the Concordat have made revisions. A consultation on the revised Concordat closed in April 2019 and the final version was launched in October 2019. Institutions were given 12 months to implement the revised Concordat. City is in a good position, but along with many other institutions the pandemic may prevent completion of the work in time for the deadline.

By acting in accordance with the revised Concordat City's research community can demonstrate that they:

1. Uphold the highest standards of rigour and integrity in all aspects of research.
2. Ensure that research is conducted according to appropriate ethical, legal and professional frameworks, obligations and standards.
3. Support a research environment that is underpinned by a culture of integrity and based on good governance, best practice and support for the development of researchers.

4. Use transparent, timely, robust and fair processes to handle allegations of research misconduct when they arise.
5. Work together to strengthen the integrity of research.

Compliance with the Concordat requires institutions to produce a short annual statement, which must be presented to their own governing body, and subsequently be made publicly available, ordinarily through the institution's website. This annual statement must include:

- a summary of actions and activities that have been undertaken to support and strengthen understanding and the application of research integrity issues (for example postgraduate and researcher training, or process reviews)
- a statement to provide assurance that the processes the institution has in place for dealing with allegations of misconduct are transparent, timely, robust and fair, and that they continue to be appropriate to the needs of the organization
- a high-level statement on any formal investigations of research misconduct that have been undertaken and to include data on the number of investigations. If no formal investigation has been undertaken, this should also be noted
- a statement on what the institution has learned from any formal investigations of research misconduct that have been undertaken, including what lessons have been learned to prevent the same type of incident re-occurring
- a statement on how the institution creates and embeds a research environment in which all staff, researchers and students feel comfortable to report instances of misconduct

This report covers the period 1 October 2019 to 30 September 2020 and highlights good practice and procedures as applicable to the year in question and will report on issues, developments and enhancements relevant to the institutional governance and operational framework for research integrity. Note that in this report research ethics is treated as a subdivision of research integrity rather than as a component of it.

2. Governance of Research Integrity at City, University of London

Support and guidance in achieving research integrity are provided through several routes:

- City, University of London Framework for Good Practice in Research
- Research Ethics Framework
- Research Governance through City's Research & Enterprise Committee, which is responsible for the strategic direction and oversight of research and development of City research policies
- School and Departmental Research and Research Ethics Committees
- Other City policies and guidance that relate to research, including in particular: Conflict of Interest, Intellectual Property, Research Data Management, Data Protection and Information Compliance.

The Vice-President (Research & Enterprise) is the senior lead for research integrity at City, and is the institutional contact should anyone have concerns, comments or questions about

research integrity at City. In addition, City's whistleblowing policy can be used by members of the public to highlight any concerns regarding research undertaken by City staff and/or students.

The Vice-President (Research & Enterprise) is supported by the Research Integrity Manager within the Research & Enterprise Directorate. The Research Integrity Manager manages the Directorate's responsibilities in this area and provides support and advice to the Vice-President (Research & Enterprise) and the Chair of Senate Research Ethics Committee. The Research Integrity Manager also liaises with other professional service departments, including the City Doctoral College, and Schools as necessary on matters relating to research integrity and research ethics.

i) Research & Enterprise Committee

The Research & Enterprise Committee is an advisory committee to the Vice-President (Research & Enterprise) advising on the development and review of institutional policies and procedures in relation to research and enterprise and monitors implementation. The Committee makes recommendations to Senate and reports, as appropriate and necessary, to the Executive Committee, Senate and Council. Research integrity is a standing item on the Research & Enterprise Committee's agenda.

ii) Research Integrity Champions

Supporting the agenda not only require appropriate governance structures, but commitment of senior management to building a strategy which can be acted upon locally in Schools and Departments. Building City's research integrity and culture will happen only if the key stakeholders are involved. Associate Deans for Research & Enterprise and the Assistant VP of the City Doctoral College have therefore been identified as Research Integrity Champions.

The Research Integrity Champions will ensure that each School provides an environment that encourages and supports good research practices and generates quality research. That research integrity principles are embedded in university and local guidance, training and procedures and existing researcher development opportunities. Most importantly the Research Integrity Champions will work to raise awareness and promote the importance of research integrity.

As a second step, Research Integrity Advisors will be appointed in Departments. Their role will be to act as advocates for research integrity issues locally. They will also be able to provide advice locally to researchers (staff and students) who are unsure about a research conduct issues and may be considering whether to make an allegation.

A new gap analysis, using the UK Research Integrity Office's (UK RIO) updated self-assessment (awaiting publication), will be undertaken by the Research Integrity Manager. The Research Integrity Manager will deputise for the Vice-President (Research & Enterprise) and work with the Research Integrity Champions during Autumn 2020 to produce a research integrity development strategy and implementation plan in response to the revised Concordat. This will be presented by the Research Integrity Manager to

the Research & Enterprise Committee and the local Research Committees for discussion and comment.

iii) Senate Research Ethics Committee

Senate Research Ethics Committee (SREC) is ultimately responsible for research ethics across the institution and for overseeing adherence to the policies and procedures set out in its Framework for Delegated Authority by City's thirteen local committees located in Schools and Departments. The local research ethics committees are required to submit an annual report to SREC. The Chair is an ex-officio member of the Academic Governance Committee and Senate. SREC reports directly to Senate.

During the academic year 2019/20, the Chair was on sabbatical and the Deputy-Chair stepped up to be the Acting Chair with one of the Committee members acting as the Deputy-Chair. In May the Chair announced he would be leaving City in September, a new Chair was appointed in June, Professor Richard Ashcroft, Deputy-Dean, The City Law School. Professor Ashcroft took over the role in August 2020. A new Deputy-Chair has also been appointed, Dr Corinna Haenschel, Reader in the Department of Psychology.

During 2019/20 the Committee's terms of reference were reviewed to ensure that oversight, governance of local Research Ethics Committees and policy and guidance development was given priority. The majority of the Committee's business is taken up with the review of high-risk applications, leaving insufficient time for consideration of broader policy matters. In the coming session the committee will seek to strike a balance to give more space for 'horizon scanning' to identify those issues which will affect City's researchers and the institutional research environment in the future.

3. Developments and activities during 2019/20 to support research integrity

Research ethics

During 2019/20 the following projects have been undertaken to support research ethics at City:

i) Internal audit of research ethics processes

An internal audit was undertaken in December 2019. The objective of the audit was to review the system of internal controls put in place by management for adequacy and effectiveness in order to provide reasonable assurance that the system objectives would be achieved. The internal audit identified a small number of recommendations, which were considered by management. Management has responded by developing ii, iii and iv below.

ii) Research Ethics Policy

In response to the internal audit, a Research Ethics Policy is currently under development with the intention of replacing the current Framework for Delegated Authority. The Policy will clarify guidelines on underpinning principles and acceptable procedures and processes and ensure a consistent approach to the review of research

ethics applications across the institution. The Policy will apply to all research undertaken by staff and students (undergraduate, taught postgraduate and research), and all research carried out in or under the auspices of City. The Policy will set out the requirements for approving research ethics proposals by City's Schools and Departments.

iii) Research Ethics Training Provision

The internal audit concluded that there are several different approaches being taken by RECs to providing training on research ethics to staff and students. The audit recommended that minimum requirements were set out in the Framework for Delegated Authority and that RECs be expected to include information on training provided in their annual reports.

The Research Integrity Manager has written a paper on research ethics training provisions which has been circulated to stakeholders for comment. The paper includes recommendations for staff and students undertaking research involving human participants, as well as training for supervisors of students undertaking such research and research ethics committee members. Stakeholders have now commented on the paper and the Chair of SREC and the Research Integrity Manager are currently holding meetings with ADREs and ADEs to establish local and disciplinary needs. Once this consultation has completed, the Research Integrity Manager will draw up an action and implementation plan, which will outline the minimum requirements for training provisions. It will be up to Schools and Departments to implement the plan in their areas. The expectation is that compliance will be achieved across the institution within 18 months.

iv) Changes to local Research Ethics Committee and annual reports

In response to the internal audit, local RECs using Research Ethics Online (REO) to review ethics applications will be expected to meet in person (or in an online face-to-face meeting) at least twice a year (at the start and end of the academic year) to discuss business and to review applications. The meetings should include a business section to discuss operational procedures and a review of the year. This should feed into the annual review, which is due at the end of August every year.

Assurance from Local RECs to SREC will be provided in the form of an annual report on activities supported by a statistical report using data from REO. In response to the recommendations from the internal audit, the annual report template will also include a section on local training provisions.

v) Response to the Covid-19 Pandemic

Due to the Covid-19 pandemic, all face-to-face research activity involving human participants was suspended on 23 March. The suspension included all City research and research under the auspices of City. Advice was given to change the mode of data collection where possible from face-to-face to the use of distanced techniques, e.g. telephone or video interviews or focus groups, or online surveys or data collection

through other online platforms. This guidance was updated in September to allow Schools to consider studies involving face-to-face participant interaction. The judgement if a study should go ahead, including restarting suspended studies, must be made in conjunction with the School and the Health & Safety Office. Lifting of suspensions or new ethics applications will only be considered once the approval from the School has been obtained and a risk assessment has been undertaken.

4. Training

The House of Commons Science and Technology Committee Report noted that some universities have made training in research integrity a mandatory part of doctoral studies and include it in their research supervisor training programme. At City, research integrity and ethics is included in the Research Supervision module run by LEaD. However, attendance is not mandatory and so training is not completed by all staff. In the coming session this issue will be considered to ensure that staff are up to date with developments, changes to legislation and the internal and external landscape.

Although training on research integrity and ethics is provided both centrally and locally, it is recognised that further development and resources for training of both staff and students are required and that research integrity needs to be embedded into the existing research development training. Going forward, training provisions on research integrity and research ethics will need to be considered, developed and implemented locally in Schools and/or Departments to ensure that all aspects of good practice in research are covered appropriately and is discipline specific as necessary.

Training activities provided annually in Schools/Departments:

Schools and Departments are responsible for ensuring that their staff, students, supervisors of student research and REC members receive appropriate training to undertake and review research involving human participants and identifiable personal data. As above (3.iii), a review of research ethics training provision is currently being undertaken and a consultation with stakeholders is ongoing.

Current local training:

- **Business School** provides workshops on research ethics and how to incorporate ethics into academic modules for all academic staff. Doctoral students receive training as part of their research methods modules.
- **School of Arts and Social Sciences** provides training on the taught programmes and for doctoral students on research methods. This includes research ethics and sessions on how to prepare a research ethics application.
- **School of Health Sciences** arranges sessions on research ethics and governance for staff and workshops on research ethics, research governance, as well as sessions on research ethics approval for doctoral and Masters students. In addition, numerous undergraduate programmes have sessions on research ethics, governance, professional ethics and law.

- **School of Mathematics, Computer Science and Engineering** organises workshops on research ethics for doctoral students, with some training available in parts of the School for Masters students on research integrity and research ethics.
- **The City Law School** provides research seminars for doctoral students where issues around research integrity, ethics and academic misconduct are discussed. Online training resources are made available to doctoral students and staff. Masters and final year undergraduate students have access to similar training, particularly around research ethics where students are undertaking projects involving human participants.

Provisions delivered and/or arranged by the Research & Enterprise Directorate

- Good Practice in Research week, 28 October – 1 November 2019. This week long event included sessions from Research & Enterprise, Library, LEaD and the Graduate School, as well as daily surgeries on various institutional systems and processes. The sessions covered some of the following: How to get published; Open Access and City Research Online; Presenting research at conference; Using social media to promote research; Preparing for your viva; Good practice in research supervision; Research data management: planning and managing data; Use and misuse of Statistics evening event, presented by Professor Jane Sutton, University of Warwick

This was the first time City ran a week with training events focusing on good practice in research. It is the intention that the Good Practice in Research week will become an annual event.

Separate sessions provided by R&E during the year

- Overview of City's Good Practice in Research and research ethics processes at doctoral student inductions (both centrally and locally)
- Research Ethics workshop for staff in the Department of International Politics, November 2019,
- Research Ethics Workshop for doctoral students in the School of Arts and Social Sciences, November 2019,
- Research integrity & research ethics session delivered to staff and doctoral students on the Research Supervision module, December 2019,
- National symposium: Developing socially responsible STEM professionals, hosted by City, University of London on 14 January 2020.
- Research Integrity session, NextMGT, September 2020,

A number of sessions had to be cancelled due to the pandemic, including:

- Awareness Raising of the Concordat to Support Research Integrity
- Authorship & Publication workshop

Upcoming training 2020/21

- Overview of City's Good Practice in Research and research ethics processes at doctoral student inductions (both centrally and locally).

5. Research Misconduct

Research misconduct is currently managed locally by Schools. However, Commitment 4 of the Concordat expects institutions to 'have robust, transparent and fair processes for dealing with allegations of misconduct...'. City has therefore been moving towards a centralised procedure for some time. However, the new procedure for investigating allegations of research misconduct was postponed due to the delay of the publication of the UK Research Integrity Office (UK RIO). A draft procedure has now been produced and shared with colleagues in HR. Once R&E and HR has agreed the final points of the document, the procedure will be implemented (Autumn 2020).

Allegations notified to the Research and Enterprise Directorate

No formal investigations were undertaken in 2019/20.

6. Planned developments 2020/21

- A Research Integrity Development Strategy to ensure development of the research integrity agenda across, based on a self-assessment including a gap analysis.
- City's Framework to Support Good Practice in Research will be reviewed and updated in response to the revised Concordat.
- HR and R&E working group on the Researcher Development and the Research Integrity Concordats.
- Action and implementation plan for research ethic training provision.
- Implementation of the Research Ethics Policy.
- Implementation of the Procedure for Investigating Misconduct in Research.
- Development of an institutional research data management policy.

7. Committees, policies and guidelines supporting and promoting research integrity

Research Integrity <https://www.city.ac.uk/research/integrity>

Framework for Good Practice in Research

<https://www.city.ac.uk/research/integrity/framework-for-good-practice-in-research>

Research Data Management <https://www.city.ac.uk/research/integrity/research-data-management>

Senate Research Ethics Committee <https://www.city.ac.uk/about/governance/council-senate-and-committees/academic-committees/senate-research-ethics-committee>

Research Ethics webpages <https://www.city.ac.uk/research/ethics>

Policy on research involving animals

http://www.city.ac.uk/_data/assets/pdf_file/0018/180432/City,-University-of-London-Policy-on-Reserach-Involving-Animals-V1.pdf

Intellectual property policy (internal) <https://staffhub.city.ac.uk/policies/information-technology/data-protection-policy>

Whistleblowing policy and procedure

https://www.city.ac.uk/_data/assets/pdf_file/0020/358022/Whistleblowing-Policy-20170509.pdf

Data protection policy (internal) <https://staffhub.city.ac.uk/policies/information-technology/data-protection-policy>

GDPR information (internal) <https://staffhub.city.ac.uk/information-technology/data-protection/gdpr-changes>

Copyright <https://libraryservices.city.ac.uk/support/copyright>

Conflict of interest (Internal) <https://staffhub.city.ac.uk/policies/research-and-enterprise-policies/conflict-of-interest-policy>

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