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.
- The online research ethics application management system has been successfully implemented across the institution. The system ensures consistency, transparency and enhance the experience for applicants and research ethics committees.
- 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 comprehensive 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 held 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 is expected to be launched in October 2019. Institutions will have 12 months to implement the revised Concordat. City is in a good position and will be able to meet the deadline for any additional requirements.

By acting in accordance with the revised Concordat, the 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 narrative statement to their own governing body that provides:

- a summary of actions and activities that have been undertaken to support and strengthen understanding and application of research integrity issues (for example postgraduate and researcher training, or process reviews);
- 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;
- a high-level statement on any formal investigations of research misconduct that have been undertaken.

This report covers the period 1 October 2018 to 30 September 2019. The annual reports will highlight 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. The reports will be designed to be independent of previous years, and some repetition can therefore be expected in the reports. 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

City expects its staff and students to seek to maintain the highest achievable standards in their research conduct. 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. This information and the contact details for the Vice-President (Research & Enterprise) are clearly signposted on City's research integrity webpage. 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 Graduate School, 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). It advises the Vice-President (Research & Enterprise) on the development and review of institutional policies and procedures in relation to research and enterprise and monitors their 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 to ensure that it is discussed at the appropriate levels of City's governance structure.

### ii) Research Integrity Committee/Steering Group

In May 2017, a Research Governance & Integrity Committee was set up to promote good conduct and encourage consistency in matters relating to research governance and integrity across the institution. The Committee undertook a review of City's current compliance with the Concordat. The review was completed in June 2018. To better support City's aims to develop and support the research integrity agenda appropriately, it was agreed that the Committee would be replaced by a Steering Group. The main difference between the Committee and the Steering Group would be that the Group would undertake projects to support and further develop City's integrity agenda, whereas the Committee's responsibility was to advise on research integrity and governance policies. However, the Group has only met once since it was establish in early 2019. This is mainly due to lack of resources to fully support and make use the Steering Group.

Further discussion on how best to develop the research integrity agenda to ensure that City can support this on a more sustainable basis has therefore taken place. However, supporting the agenda does not only require appropriate governance structures. It is also an issue of management and strategy, which will best be considered and acted upon locally in Schools and Departments in order to identify key issues and best practice. Disciplines will have varying issues and concerns, which will need to be addressed on that level. The Vice-President (Research & Enterprise), Associate Deans for Research, the Interim Director, Research & Enterprise, and the Research Integrity Manager have therefore agreed the following:

- Other than providing guidance on the implementation of the Concordat and oversight there is no specific role for implementation at the institutional level

beyond the governance function the Research & Enterprise Committee is currently providing.

- The requirements of the Concordat should be considered and delivered at the level of the School. School/Departmental Research Committees should add research integrity as a standing item on the agenda, with City's Research Integrity Manager attending as required to discuss local issues and how to implement local initiatives (e.g. policies).
- Schools will report on an annual basis to the Research & Enterprise Committee. Notwithstanding specific reporting requirements under the Concordat, the report will address relevant local activity undertaken in the previous year, such as training.

Following the decision to proceed as above, the Research Integrity Manager will during the 2019 Autumn term produce an internal action and implementation plan in response to the revised Concordat. This will be presented by the Research Integrity Manager at 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 system of delegated authority was implemented across City in 2011, in order to develop a coherent and consistent approach. The institution does not insist on Schools setting up local sub-committees of SREC where the volume of research is minimal, but policies and procedures to address research involving human participants, materials and/or data not in the public domain must be in place and agreed with SREC. 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. The Academic Governance Committee approves minor amendments to the terms of reference and composition of SREC as well as scrutinising its regulations, policies and procedures ahead of approval by Senate. SREC reports directly to Senate.

The current chair of SREC is on sabbatical for 12 months from 1 September 2019. During the academic year 2019/20, the Deputy-Chair will therefore be the Acting Chair with one of the Committee members acting as the Deputy-Chair.

During 2019/20 the Committee's terms of reference will be reviewed to ensure that oversight, governance of local Research Ethics Committees and policy and guidance development is given priority. The Committee's time is currently mostly taken up with the review of high-risk applications, leaving insufficient time for consideration of other matters. The Committee should spend more time considering guidance and best practice as well as discuss issues which are on the horizon, such as the ethical implications of artificial intelligence.

**3. Developments and activities during 2018/19 to support research integrity**

**Research ethics**

During 2018/19 the following projects have been undertaken to support research ethics at City:

   i)    **Online application workflow management system**

The online research ethics workflow management system went live across the institution in October 2018. Previous local versions of application forms and templates can no longer be used and all research requiring ethical scrutiny, including student and low-risk research, must be submitted through Research Ethics Online (REO). The system was implemented to help streamline the practices across the university; provide the tools to audit the local RECs to ensure that best practice, legislation and university policies and ensure that procedures are followed; speed up the approval process for students and staff; and reduce the time burden on research ethics committee members, chairs and administrators. It also ensures the appropriate standard of applications, by for instance requiring supervisor signoff for student applications. The risk level of applications is determined based on the applicant's responses and is automatically routed to the correct Committee. Since going live, approximately 1300 applications have been approved using the system.

The user feedback from applicants, administrators and research ethics committee members has been positive, although it is noted that in some areas the workload has increased. However, this is a positive development as this indicates that the processes in place are capturing projects which may previously not have undergone the same level of scrutiny. An internal audit of the system will be undertaken in November 2019.

The system is being developed further by the company, Haplo, in the coming months, and City has input in the development via the User Group which meets on a regular basis. In addition, the system in under constant review internally in order to improve the processes and the length of time it takes for the approvals. In 2019/20, the possibility of adding a minimal risk process will be considered to further enhance the efficiency of the process.

   ii)   **Appeals process**

The process for appealing a decision made by one of City's Research Ethics Committees has been simplified. Where previously each local Research Ethics Committee had their own appeals process, potentially making it a three stage process, all appeals against a decision of any of City's Research Ethics Committees must now be made to Senate Research Ethics Committee. An appellant whose appeal to the Senate Research Ethics Committee is not upheld may request an institutional-level review. Appeals are defined as a request from an applicant for a review of a decision in relation to significant amendments requested to or rejection of a research ethics application by one of City's Research Ethics Committees. The changes to the appeals process were approved by AGC and Senate.

### iii) Local webpages

To ensure consistency in information provided to staff and students, local webpages for all research ethics committees have been developed. The webpages include information about local procedures and deadlines, terms of reference of the committees, membership, as well as any guidelines specifically relevant to the local Research Ethics Committee (e.g. guidelines from the British Psychological Society for research undertaken in the Department of Psychology). All other information is held on the central research ethics webpages to ensure consistency in the information provided and ease of access.

### iv) Quality assurance of local research ethics committees

Senate Research Ethics Committee has agreed to develop a quality assurance exercise to ensure consistency across all Research Ethics Committees. The quality assurance will include the review of participant information sheets, consent forms and annual reports. SREC is currently in the process of establishing the process and schedule.

### v) Security Sensitive Material Research Policy / Accessing Obscene Material Online

Both the above polices have been updated to require a full research ethics application to and approval by Senate Research Ethics Committee, instead of a registration of the project, which was the previous process. In addition, there is a need for a process to review any legal implications which may arise from accessing any materials. All projects involving potential access to criminal material, research involving security sensitive material and/or accessing obscene material should require authorisation on behalf of City before they could commence. It is suggested that these processes and mechanisms should sit with the Associate Deans for Research & Enterprise and Information Compliance. The Insurance Team should also confirm that the project is indemnified by City's insurance. A process to consider the welfare, support and training needs of the researcher undertaking the project will also be required, particularly in instances when projects could potentially lead to distress and/or radicalisation of the member of staff/student. However, this is not within the remit of Senate Research Ethics Committee and will now be taken forward by Student & Academics Services with advice from the Research Integrity Manager in Research & Enterprise.

**Advice and policy development**

### i) Intellectual Property policy

In 2017, Research & Enterprise begun a revision of City's Intellectual Property policy, as the previous version had not been reviewed since 2014. Consultation was undertaken with key stakeholders and expert lawyers to ensure that the policy principles were in line with the wider sector and that there was clarity around the institution's position on IP generated by undergraduate and postgraduate students. Due to the detailed consultation required, the revision process was significantly delayed. The policy has now been approved by the Executive Committee in September 2019 and it will be considered by Council in November 2019.

### ii) Conflict of Interest policy

The Conflict of Interest policy and Annual Register of External Interests form were initially implemented in January 2018. This year, the Research & Enterprise Policy Officer has started Phase 2 to review the effectiveness of the policy. Schools have been asked to provide information on compliance rates and feedback on the implementation process. The summary report will be discussed at the Research & Enterprise Committee.

## 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 across City so not all research supervisors attend the module. It also does not address training of more senior academics and this will need to 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 if necessary. Research & Enterprise will be able to support some local provision and will continue to provide institution-wide workshops and other training events.

**Training activities provided annually in Schools/Departments:**
- **Cass 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 Office**
- Overview of City's Good Practice in Research and research ethics processes at doctoral student inductions (both centrally and locally) presented by Anna Ramberg, Research Integrity Manager.
- Open Access Week 22-26 October 2018, facilitated by internal and external speakers. The sessions covered:
  - Research data management
  - Introduction on the RDM life cycle
  - Introduction to data discovery and licensing
  - Open access

  The session were audio recorded and the recordings and slides have been made available online to staff and students to provide continued access and training opportunities.
- Publication Ethics half day, facilitated by Margaret Rees from the Associate of Research Managers and Administrators. The session explored the discussion of good practice in authorship and how to ensure high standards, the required standards for authorship and the customs which have arisen in different disciplines.
- Research Integrity half day, facilitated by James Parry, Chief Executive UK Research Integrity Office and Anna Ramberg, Research Integrity Manager. The session explored the challenges involved in ensuring that research is high quality and of high ethical standards, discuss notorious cases of research fraud and an introduction to City's policies and procedures.
- Replicability crisis in biomedical science: issues and solutions half day, facilitated by Kielan Yarrow and James Yearsley, City and Denes Szucs, Cambridge. The session explored why so much research in psychology, neuroscience and the wider biomedical literature is proving difficult to replicate, and what might be done to mitigate this trend.
- Workshop in Research Ethics, including how to complete an ethics application form, delivered to doctoral students by Anna Ramberg, Research Integrity Manager.
- Research integrity & research ethics session delivered to staff and doctoral students on the Research Supervision module, by Anna Ramberg, Research Integrity Manager.
- International Development: Ethics in Research & Practice, presentation by Anna Ramberg, Research Integrity Manager, on undertaking ethical research in developing countries.

**Upcoming training**

- Good Practice in Research week, schedule for 28 October – 1 November 2019. This week long event will include sessions from Research & Enterprise, Library, LEaD and the Graduate School, as well as daily surgeries on various institutional systems and processes (e.g. risk assessments and health and safety for researchers; GDPR; Figshare; research ethics). The sessions will cover some of the following:
    - How to get published
    - Open Access and City Research Online
    - Presenting research at conferences
    - 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 is the first time City is running 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, which will be developed and changed to respond to internal and external needs and requirements.

- Research Ethics workshop for staff in the Department of International Politics, November 2019, facilitated by Anna Ramberg, Research Integrity Manager.
- Research Ethics Workshop for doctoral students in the School of Arts and Social Sciences, November 2019, facilitated by Anna Ramberg, Research Integrity Manager.
- The Good Practice in Research Game (under development)

## 5. Research Misconduct

Research misconduct is currently managed locally by Schools. The new procedure will be developed based on the UK Research Integrity Office (UK RIO) updated procedure (to be published Autumn 2019) and will be implemented in Spring 2020. The new procedure will also take in to account the recommendations in The House of Commons Science and Technology Committee's report on research integrity.

**Allegations notified to the Research and Enterprise Directorate**
No formal investigations were undertaken in 2018/19.

## 6. Planned developments 2018/19

- City's Framework to Support Good Practice in Research will be reviewed and updated in response to the revised Concordat. In addition, work to improve the

accessibility of the information and user experience of the current research integrity webpages will be undertaken as part of the web project.

- An action and implementation plan to ensure development of the research integrity agenda across the institution will be developed by the Research Integrity Manager for Schools to consider locally.
- Development of an institutional research data management policy.
- Further training will be developed. This will include both online resources as well as face-to-face training opportunities.
- A review of Senate Research Ethics Committee's terms of reference will be undertaken to consider how best to support research ethics across the institution and to ensure consistent support, knowledge and resourcing in all Schools.

**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 http://www.city.ac.uk/__data/assets/pdf_file/0005/77063/City-University-London-IP-Policy-v0.86-1410101.pdf
Whistleblowing policy and procedure
https://www.city.ac.uk/__data/assets/pdf_file/0020/358022/Whistleblowing-Policy-20170509.pdf
Data protection and information compliance (It is now also internal)
https://intranet.city.ac.uk/staff/info_compliance/info_compliance.html
GDPR information (internal) https://staffhub.city.ac.uk/information-governance-gdpr-awareness
Copyright https://libraryservices.city.ac.uk/support/copyright
Conflict of interest https://www.city.ac.uk/__data/assets/pdf_file/0004/394924/Conflict-of-Interest-Policy-for-Academic-and-Research-Staff.pdf

Anna Ramberg
Research Integrity Manager
Research & Enterprise Directorate
September 2019