

# Annual Research Integrity Report to Council 2020/21

## Summary of key points:

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 governance structures around research ethics and integrity are more unified in 2020/21 than before with Departmental, School and Senate Research Ethics Committees cooperating to consider research projects of increasing risk.

The temporary suspension of face-to-face research involving human participants and overseas travel due to the Covid-19 pandemic led to new guidance for researchers.

The HE Sector has renewed interest in research integrity but sometimes under new agendas of research culture and reproducibility.

There have been no formal investigations of research misconduct under section 7 of the procedure this year. There has been one investigation under Section 6 of the procedure for investigating misconduct in research; which allows for the initial assessment of an allegation.

## 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 launched in October 2019. Institutions 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.

The annual report 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.

This report covers the period 1 October 2020 - 30 September 2021 but pays regard to the full period of Covid-19 restrictions (Mar 2020 – October 2021) which badly affected face-to-face research activities.

## **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) is the senior lead for research integrity at City, and is the institutional contact should anyone has concerns, comments or questions about research integrity at City. This information and the contact details for the Vice-President (Research) 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) 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) 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) 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**

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 established 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 in 2020/21. 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), Associate Deans for Research, the Director of the Research & Enterprise Office, 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 during the 2020/21 produced an internal action and implementation plan in response to the revised Concordat. This was 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.

Professor Richard Ashcroft, has been appointed Chair of the Senate Research Ethics Committee for a term of 3 years starting September 2020. Richard is Deputy Dean and Professor of Bioethics in City Law School. He is an expert on biomedical research ethics and public health ethics, with more than 200 publications in these fields. He has had numerous public roles, including most recently a year as an Alan Turing Fellow at the Alan Turing Institute (2018-19), working on ethics and artificial intelligence in healthcare. Richard takes up the post from Peter Ayton who left City in 2019 to take up the position of Professor of Decision Research at University of Leeds.

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.

### ***SREC meeting dates 2021/22***

- 22 September 2021, 14:00-16:30, TBC (business and review meeting)
- 17 November 2021, 14:00-16:30, TBC (review only meeting)

- 26 January 2022, 14:00-16:30, TBC (business and review meeting)
- 23 March 2022, 14:00-16:30, TBC (review only meeting)
- 11 May 2022, 14:00-16:30, TBC (business and review meeting)
- 22 June 2022, 14:00-16:60, TBC (review only meeting)

### **3. Covid-19 Guidance on face-to-face research**

Given the exceptional nature of the situation arising as a result of the Coronavirus (COVID-19) pandemic, the Senate Research Ethics Committee (SREC) issued instructions that required all ongoing research to make changes to how participant interactions are conducted. During the restrictions, in order to maintain social distance, researchers were required to consider if they can adapt their research to conduct participant interactions remotely. If that wasn't possible the research had to be paused. In addition, SREC temporarily suspended the requirement for approval of modifications that relate only to changes to participant interactions from face-to-face to remote, unless there is a substantial change to the protocol as a result of the change. The SREC Guidance took effect from 23rd March 2020 until September 2021.

Researchers who had already received ethical approval and cannot conduct participant interactions remotely were told to inform subject participants that research has been paused. However, unless the changes made to pause the study result in a substantial change to protocol, the pausing of a research study and issue of an update to participants will not need to be considered as a modification. City's COVID19 guidance for research: <https://www.city.ac.uk/research/ethics/covid-19-guidance>

#### **i) New submissions for ethical approval during Covid-19 restrictions**

During Covid-19 restrictions researchers could continue to submit applications and registration forms to City Research Ethics Online and reviews continued to be conducted. However, it was made clear in the approval letter that researchers were not permitted to begin data collection which required any face-to-face interactions with participants in person until further notice. The following options were given instead:

1. Obtain ethical clearance for a project involving face-to-face interactions with participants in person.
  - i. If you wish to commence data collection immediately you must amend these interactions to be conducted remotely as outlined above.
  - ii. If it is not possible to conduct your participant interactions remotely then you must then wait until you are advised by City that face-to-face interactions can recommence before you begin any data collection in person.
2. Students with time constraints around conducting your research and cannot conduct remote participant interactions, it is recommended that you change your research to involve secondary data analysis only (i.e. data which has already been collected) so that no primary data collection is required.

#### **ii) International research during Covid-19 restrictions**

Throughout the period of government Covid-19 restrictions City did not permit international travel, including for research purposes. Even where staff and students were not permitted to undertake face to face research if they are currently based outside the UK. In these instances, staff and student

based abroad were instructed to use telephone calls or online methods of communication to collect data or conduct surveys, interviews and focus groups.

### **iii) Guidance following the relaxing of Covid-19 restrictions – October 2021**

New guidance on coronavirus guidance for face-to-face research was issued in October 2021. Staff and students were issued with instructions that they can now undertake research projects in the UK which require face-to-face interactions with participants. Requirements such as the wearing of face masks, social distancing, ensuring adequate ventilation and the cleaning of surfaces must still be maintained. A risk assessment must be undertaken with the Health and Safety Office before any research can restart. The approved risk assessment should be uploaded on the Health & Safety tab when you submit your ethics application. Each project application should now have a risk assessment that shows what is being done to address COVID risks.

## **4. Developments and activities during 2020/21 to support research integrity**

### **Research ethics**

During 2020/21 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. 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 continues to be 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.

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 is under constant review internally in order to improve the processes and the length of time it takes for the approvals.

Looking to the future, there is the possibility of adding a minimal risk process which 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 policies 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 (based in the Procurement 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.

### **vi) Research ethics reviews in progress:**

The Chair of the Senate Ethics Committee has initiated several reviews:

*Review of undergraduate research ethics applications.* This work includes working with programme offices in Schools and with Student and Academic Services. The project is being led by Dr Corinna Haenschel, SREC member and Reader in Psychology.



*Research projects involving animals.* The starting point for this review is City current policy on animal research which advises researchers on the lawful use of animals as set out in the Animals (Scientific Procedures) Act 1986, or 'ASPA'. This project is being led by Chair of SREC, Professor Richard Ashcroft.

*Review of how incidents are handled following a breach of research ethics.* This review is also being led by Chair of SREC, Professor Richard Ashcroft.

## **5. Research Culture and Integrity**

A paper on research culture at City was sent to the University Research & Enterprise Committee in June 2021 for consultation.

City expects its staff and students to maintain the highest achievable standards in research conduct and are committed to ensure that research is conducted responsibly, ethically, and in line with City's Code of Practice for Research and Researchers. In order to maintain and uphold the highest standards we continue to develop and enhance the relevant governance and operational frameworks and policies in relation to research integrity and ethics, and working together to strengthen the research environment and culture. However, recent external surveys have shown that the existing institutional research environment can affect researchers' wellbeing negatively and can impact on the quality and reliability of research.

Defining what good research culture should look like is not an easy task, and it may be more helpful to consider the values the organisation aspires along with its priorities. Achieving a good research culture is the responsibility of all staff and students at City, and cannot, solely, be achieved by the implementation of policies and procedures. Research culture encompasses the behaviours, values, expectations, attitudes and norms of research communities. It influences researchers' career paths and determines the way that research is conducted and communicated.

This paper on research culture sets out some of the findings from the Wellcome Trust survey on research culture, changes to the UKRI CVs, the elements of the Concordat to Support Research integrity and discusses some possible starting points for improving the research culture at City. The University Research & Enterprise Committee was asked to discuss how to address the issues outlined in this paper and consider possible initiatives or measures.

## **6. Reproducibility and research integrity**

The Science and Technology Committee, House of Commons has launched an enquiry into reproducibility and research integrity.

As the UK seeks to recover from the pandemic, research and innovation has the ability to drive economic growth, with UKRI estimating that every £1 spent on research and development delivers £7 in economic and social benefit. However, the integrity of research, especially medical and social science research, is at risk from what is known as the 'reproducibility crisis' (i.e. it being very difficult or impossible to replicate a scientific study).

As early as 2005, the issue of reproducibility was identified in Ioannidis' paper, 'Why Most Published Research Findings Are False,' and since then a large number of surveys or replication studies have been conducted that show the prominence of the issue.



So far, Government policy has focused on the overall theme of 'Research Integrity,' including asking UKRI to establish a national research integrity committee as recommended by our predecessor Committee, but the specific issue of reproducible research has been overlooked.

The Inquiry was launched in July 2021 and the deadline for submissions was Thursday 30 September 2021. It is expected to deliver its report in 2022.

## **7. Procedure for Dealing with Allegations of Misconduct in Research**

Research misconduct is currently managed locally by Schools. A new university wide procedure was developed and implemented from the start of 2021. City is committed to ensure we are using a transparent, timely, robust and fair process to deal with allegations of research misconduct when they arise. The new policy will help ensure this.

### **Allegations notified to the Research and Enterprise Directorate**

No formal investigations were undertaken in 2020/21, under section 7 of the procedure for investigating allegations of misconduct in research. One investigation was carried out under section 6 requiring an initial review of allegations to make recommendation for further action under section 7. The investigation under section 6 recommended no further action.

## **8. 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.

New approaches to embedding training for research ethics and research integrity into both Doctoral Research training and also into taught programmes are required. This will require greater partnership with, for example, the Senate Research Committee.

### **Training activities provided annually in Schools/Departments:**

- **Bayes 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.

## 9. Planned developments 2020/21

### Senate Research Ethics Committee

#### Programme of Work 2021/22

May 2021	September 2021	January 2022
<ol style="list-style-type: none"> <li><b>Research involving animals:</b> <i>Revised policy to be approved by SREC</i></li> <li><b>Standard Operating Procedures for local RECs:</b> <i>Template to be considered and approved by SREC</i></li> <li><b>Research Ethics Training Provisions:</b> <i>Discuss how to support Schools and Departments provision of training (discussion to inform the implementation plan; implementation plan to be approved by circulation)</i></li> </ol>	<ol style="list-style-type: none"> <li><b>Review local REC annual reports:</b> <i>Review and discuss the local REC's annual reports</i></li> <li><b>Local REC SOPs:</b> <i>Review and approve the local REC's SOPs</i></li> <li><b>SREC annual report:</b> <i>Consider the report to Academics Governance Committee and Senate (the report will not be circulated to the Committee again; any suggested amendments to the report will be approved by the Chair after the meeting)</i></li> </ol>	<ol style="list-style-type: none"> <li><b>Research Ethics Training Provisions:</b> <i>review of reports from Schools/Departments on the implementation of research ethics training provision</i></li> </ol>

<p><b>4. Code of Practice for Research &amp; Researchers:</b> <i>Circulated to stakeholders, including SREC, for comment in April or early May.</i></p> <p><b>5. Clinical Research Policy:</b> <i>Circulated to stakeholders for comment before approval by SREC in September.</i></p>	<p><b>4. Clinical Research Policy:</b> <i>Approve the policy.</i></p>	

## 10. 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](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](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](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](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](https://www.city.ac.uk/_data/assets/pdf_file/0004/394924/Conflict-of-Interest-Policy-for-Academic-and-Research-Staff.pdf)