

Annual Research Integrity Statement – 2019

The Concordat to Support Research Integrity¹, substantially updated in 2019, requires employers of researchers to provide a short annual (publicly available) statement that must include:

- a summary of actions and activities that have been undertaken to support and strengthen understanding and the application of research integrity issues
- 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 organisation
- a high-level statement on any formal investigations of research misconduct that have been undertaken, which will include data on the number of investigations
- 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 statement has therefore been 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 Concordat to Support Research Integrity

² As set out in <u>Council Regulations 15 of 2002</u>, 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".

Pre-amble

The excellence of research produced by the University of Oxford is intrinsically linked to the integrity of its researchers. As set out in its Academic Integrity in Research: Code of Conduct and Procedure¹, the University expects all its members, including staff and students and those who are not members of the University but who are conducting research on University premises or using University facilities or funding for their research, to observe the highest standards of ethics and integrity in the conduct of their research.

The University's commitment to research integrity is embedded in its institutional systems and culture.

The University's Research and Innovation Committee² (chaired by the Pro-Vice-Chancellor for Research, and which reports directly to Council) has central responsibility, *inter alia*, for advising on policies which promote research integrity (also termed good practice in research). Its members include senior academic representatives from all the Academic Divisions, from Colleges as well as student representatives.

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

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. These are subject to ongoing review and update; the summary indicates if a particular policy was updated in 2019.

ii. Training and professional development offered

There is a wide variety of training and other professional development related to supporting good practice in research, available to research staff and students. The Research Services <u>'Integrity and Ethics Training'</u> <u>webpage</u> provides summary information and links to online and in-person training available which includes:

a. Online training

Online discipline-specific training courses³ in research integrity (licensed from the company Epigeum Limited, part of Oxford University Press) are available 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 and other training for clinical researchers⁶.

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. Postgraduate research students must complete a course on research integrity during their first year of study and are prompted to provide evidence of having undertaken this training when transferring status (i.e from Probationer Research Student (PRS) to, for example, DPhil, MLitt or MSc status).

¹ Academic Integrity in Research: Code of Conduct and Procedure

² Terms of reference

³ Online discipline-specific training courses in research integrity

⁴ Online Epigeum course in avoiding plagiarism

⁵ Online accredited training in Good Clinical Practice

⁶ Other training for clinical researchers

A review of research integrity online training provision is underway, coordinated by representatives from Research Services and Academic Divisions (to include how best to promote such training and ensure uptake by research students and staff), with a view to providing updated training in 2020.

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 <u>Lynda.com</u>.

b. In-person training

There is also 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, Oxford's People and Organisational Development (formerly known as the Oxford Learning Institute), IT Services, Biomedical Services and Research Services.

2. Reviews of policy, processes and guidance

i. Academic Integrity in Research: Code of Practice and Procedure

This Code (last 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. The Code (openly available via <u>the University's webpages on Research Ethics and Integrity</u>) 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. This procedure includes the timelines that will apply when formal allegations of misconduct in research are assessed and investigated,

Within the University, Individuals are encouraged to challenge misconduct or poor practice in research and, before making a formal allegation of misconduct in research, to discuss concerns within their department or faculty as appropriate. Sources of advice and support for University members include:

- supervisors
- senior tutors
- directors of graduate studies
- heads of department
- research ethics committees
- Research Services
- Clinical Trials and Research Governance team
- UK Research Integrity Office (of which the University is a subscribing member)

The Code of Practice and Procedure will be reviewed in 2020 to ensure that it continues to work effectively and reflects evolving research practice, as well as the expectations and requirements of research funders and the updated Concordat to Support Research Integrity.

iii. Human research ethics committees

The University's policy on the ethical conduct of research involving human participants and personal data requires that all such research be subject to appropriate review

In 2019, a total of 1865 research projects were reviewed via the Central University Research Ethics Committee (CUREC): 1486 by the Social Sciences and Humanities Inter-divisional Research Ethics Committee (SSH IDREC) and its associated Departmental Research Ethics Committees; 264 by the Medical Sciences Interdivisional Research Ethics Committee (MS IDREC); 115 by the Oxford Tropical Research Ethics Committee (OxTREC).

CUREC undertook a review of the University's policy for research involving human participants and personal data. The revised policy was approved at its meeting in June 2019 and then published on the CUREC website¹. CUREC also approved:

- new guidance around social sciences research conducted overseas and how best to approach the ethical review and approval of such research. This was also 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), and reflected the principles set out in the new 'Global Conduct of Research in Resource-Poor Settings'², including an emphasis on the need for researchers to obtain local ethical review and approval as well as via the University's own processes;
- an expedited review process to allow for the ethical review approval of certain very low-risk research projects conducted by undergraduates to be reviewed and approved solely by the student supervisor;
- new guidance around research involving refugees, outlining potential ethical challenges and how to address these when planning such research;
- new guidance for researchers applying to OxTREC for ethical review and approval, with a focus on the common challenges that arise when conducting medical research in low-income settings;
- a comprehensive update of its existing guidance on `Internet-based Research' to include guidance on higher risk research using social media, research using `Deepfakes'. The updated guidance was developed primarily by the Social Sciences and Humanities Inter-divisional Research Ethics Committee.

iv. Clinical Trials and Research Governance (CTRG)

In the case of clinical trials or research involving National Health Service (NHS) patients, ethical review and approval must be provided via the NHS Research Ethics Committees (further information is available on the <u>HRA website</u>). Dedicated support is provided to clinical researchers through Research Services' Clinical Trials and Research Governance Team (CTRG).

CTRG provided University sponsorship for 134 new clinical research studies in 2019, of which nine were Clinical Trials of Investigational Medicinal Products (CTIMP). CTRG processed approximately 500 amendments and conducted 96 monitoring visits on 35 different trials. CTRG's specialist Quality Assurance team undertook four system audits and one vendor audit, reviewed 39 Clinical Trial Unit internal audits.

CTRG updated researchers throughout the year on specific areas of clinical research which could be impacted by the UK leaving the EU and the mitigations that are being put in place for these areas. CTRG

¹ <u>CUREC website</u>

² <u>Global Conduct of Research in Resource-Poor Settings</u>

remains the link to the Department of Health and Social Care for clinical research related enquiries.

v. Research involving human tissue

Three of the University's Human Tissue Authority (HTA) Licences were inspected by the Human Tissue Authority in 2019, each receiving positive results with no major concerns identified. The Human Tissue Authority praised the work that has been undertaken at all levels of the University to embed good practices and governance of research involving human tissue. The University's in-house Human Tissue Act training was retired and replaced with an updated and externally provided training platform. The Human Tissue Governance Team, based in Research Services, continued to support researchers working with human tissue by hosting an annual HTA Forum; providing monthly drop-in clinics; reviewing and updating their website and other resources; and holding regular meetings and committees with relevant stakeholders. Planning is underway to broaden the remit of the Human Tissue Governance Team to support all of the University's Human Tissue Authority Licences.

vi. 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. Throughout 2019, Research Services (via the Clinical Trials and Research Governance Team and the Research Ethics and Integrity Team) continued to work closely with the University's Central Information Compliance team and with departmental Information Governance teams in relation to data protection impact assessments, and reporting and correction of personal data breaches.

vii. 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 formulating a research data management plan (often required as part of a research funding proposal), protecting 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;
- training and briefings for librarians and research support staff;
- maintaining the Research Data Oxford¹ website, a central source of information, advice, and details of resources relevant to research data management; work is also ongoing to overhaul and comprehensively update the site and migrate it to a new platform;
- securing funding, selecting and appointing external consultants, and beginning preliminary work for a comprehensive review of research data management support in Oxford, which will continue throughout the 2019-20 academic year, looking at the adequacy of current provision, user requirements, and governance.

In 2019, IT Services continued to work on a number of projects to help researchers manage their data more effectively:

¹<u>Research Data Oxford website</u>

- a funding model was developed and agreed for the LabArchives electronic laboratory notebook service¹, which 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;
- the Research File Service (RFS) project, which aims to provide very large storage for data intensive research projects, and the Digital Humanities Sustainability project, which aims to deliver a collection management solution, both entered proof of concept phases; discussions about funding and possible future development also continued.

viii.Research involving animals

The University of Oxford's Animal Use Policy requires that anyone involved in research that includes the use of animals is proactive in pursuing refinement, reduction and replacement (usually referred to as the 3Rs) in procedures involving live animals wherever possible. In addition, all researchers and animal care staff must ensure they engage fully in the approved ethical process of review and monitoring of animal-based research. The Animal Use Policy also commits the University to providing standards of accommodation and care that exceed, wherever possible, the minimum standards required by UK national legislation and that of the European Union.

The Animal Care and Ethical Review Committee (ACER) is required to report annually to Council on all activities concerned with research management and compliance with licensing. It produced a comprehensive annual report to Council for 2018-19, summarising the work of the Committee, its six Animal Welfare and Ethical Review Bodies (AWERBs) and a further sub-committee (that considers the application of the 3Rs in research), 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 12 December 2019 (pp170-174)².

ix. Conflict of interest

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

In 2019, the focus of the Conflict of Interest Committee's work continued to be on outside appointments and research commercialisation, and its role in supporting departments and divisions in managing potential conflicts of interest. The intention is to develop a series of case studies that frame good practice across the University.

For the past few years the annual financial self-assurance exercise for departments has included a set of questions on compliance with a number of University policies and regulations, including the Conflict of Interest policy. This exercise continues to be a useful way to obtain information and feedback from departments.

¹ LabArchives electronic laboratory notebook service

² University Gazette of 12 December 2019

x. Global Challenges Research Fund (GCRF)

The University organised and hosted a one-day symposium 'The good, the bad and the project: Interdisciplinary ethics in development research and practice'. This provided a platform to explore questions of ethics and justice around key aspects of research funded by Official Development Assistance (ODA). More than 85 delegates (drawn from UK and international universities and research organisations, funders, governments, NGOs and charities) heard presentations from UKRI, DFID and the MRC as well as talks from Oxfam, Save the Children, NGOs and the Global Development Network.

xi. Reproducible Research_(RROx)¹

Reproducible Research Oxford (RROx), originally established in 2016, was expanded in January 2019 into an inter-divisional initiative focused on fostering a culture of open scholarship and research reproducibility at Oxford. RROx operates as the local node of the <u>UK Reproducibility Network</u> (UKRN) and is run by a Steering Group with representation from all Divisions in the University and from all career stages — from DPhil student to senior professor.

One focus of RROx activities is to support training to improve reproducibility of individual research projects. This includes training in good research practice and how to make research outputs openly available and research integrity is an integral part of this training. In 2019, it organised and hosted the Oxford-Berlin summer school on Open Research, a 5-day workshop for DPhil students and postdoctoral researchers in biomedical and social sciences, which covered topics such as study design, the publishing system, open data and materials, and Citizen Science in lectures and workshops. Materials can be found on <u>Open Science Framework</u>.

RROx also supports <u>ReproducibiliTea journal clubs</u>. This is an initiative led by early-career researchers with weekly meetings where they discuss research papers that cover different aspects of open and reproducible research to raise awareness about these issues in a more informal setting.

xii. Bullying and harassment

A number of key University research funders (eg. the Wellcome Trust, Cancer Research UK the British Heart Foundation) have recently introduced new policies on bullying and harassment, which form part of the terms and conditions for all grants awarded by these funders. In 2019, Research Services and Personnel Services worked together on communicating to departments these new policy requirements and the implications of these for departments (notably in ensuring that staff should be made aware of funder as well as the University's policies, as well as the requirement to report any live disciplinary sanction for bullying and harassment to the appropriate funder at grant application stage).

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. Throughout 2019, the University has been represented at conferences, workshops and meetings organised by bodies such at the UK Research Integrity Office, Universities UK, the UK Reproducibility Network and the League of European Research Universities (LERU).

¹ <u>RROx website</u>

xiii. Russell Group Research Integrity Forum

The University's Research Ethics and Integrity Team continue to be active members 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 2019: in April 2019, at the University of York and in November 2019, at Queen's University, Belfast.

xiv. League of European Research Universities (LERU)

The Senior Assistant Registrar (Ethics and Integrity) continued to work closely with the LERU Research Integrity Thematic Group, which met in Leiden in May 2019 and at Trinity College Dublin in November 2019.

This Group also led on the production of the LERU advice paper, `Towards a Research Integrity Culture at Universities: From Recommendations to Implementation¹', published in January 2020².

xv.UK Research Integrity Office (UKRIO)

The University has had a longstanding subscription to UKRIO and was represented at the UKRIO annual conference in May 2019.

Via its subscription to UKRIO, the University has 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.

xvi. 2019 Update of Concordat to Support Research Integrity

The University was actively involved in responding to the sector-wide consultation, coordinated by Universities UK, regarding the update of the 2012 Concordat to Support Research Integrity. This involved seeking widespread input from academic departments and members of research-related committees to encourage an institutional response to the consultation. This response was developed by the Pro-Vice-Chancelllor (Research) with support from the Senior Assistant Registrar (Ethics and Integrity) and reported to the Research and Innovation Committee. In addition, the University also contributed to the joint consultation response made by the Russell Group Research Integrity Forum.

xvii. Clinical Trial sponsorship

Until recently, there had not been a body that represented universities as sponsor organisations at a national level. In 2019, the Clinical Trials and Research Governance (CTRG) team established the Association of University Research Sponsors (AURS) as such a body. The group includes representatives from all major UK universities sponsoring research and has now met on two occasions.

¹ <u>Towards a Research Integrity Culture at Universities: From Recommendations to Implementation</u>

² Towards a Research Integrity Culture at Universities executive summary

4. Investigations of allegations of misconduct in research undertaken in 2019

As set out in the Academic Integrity in Research: Code of Practice and Procedure¹, the Registrar is the senior officer designated within the University with responsibility for responding to allegations of misconduct in research. The Senior Assistant Registrar (Ethics and Integrity) is designated as a named contact point for those wishing to raise, in confidence, concerns about the conduct of University research, before any formal allegation is made². In cases of allegations of misconduct in research which involve students, the Registrar may refer these allegations to the University Proctors³ 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 2019, 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 two allegations which were received in 2018, but where the ensuing investigation was concluded in 2019. 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.	Allegations of fabricated data in several journal papers (received in 2018; investigation concluded in 2019)	 Panel investigation upheld various allegations of misconduct in research. Retraction of two papers recommended and under consideration. [October 2020 update. Retraction details are available: <u>JACC website (1)</u> and <u>JACC website (2)</u>]
2.	Allegations of lack of appropriate acknowledgement and recognition of intellectual contribution in a published book (received in 2018; investigation concluded in 2019)	Panel investigation upheld allegations. Publishers of the book were notified. Sales of print version of the book have been suspended and corrections to the online version have been requested.

¹ Academic Integrity in Research: Code of Practice and Procedure

² Research misconduct guidance

³ Proctors' Office

3.	Allegation of denial of authorship	Allegations related to research not conducted at Oxford (before the researcher in question was an Oxford employee). Investigation (conducted by third-party institution) upheld allegations. Publisher informed of corrected authorship listing.
4.	Alleged data manipulation	Preliminary investigation found evidence of data manipulation in pre-publication manuscripts. Repeat experiments were conducted by research team in order to make appropriate corrections.
5.	Allegation of denial of authorship and data manipulation	Panel investigation concluded that there was no evidence of research misconduct. Not upheld.
6.	Allegation of data manipulation	Panel investigation concluded that there was no evidence of research misconduct. Not upheld.
7.	Allegation of errors in various publications	Investigation ongoing
8.	Allegation of denial of authorship and errors in various publications	Complaint dismissed at the preliminary review stage
9.	Allegation of data manipulation	Complaint dismissed at the preliminary review stage

In cases where the allegations of misconduct were upheld, feedback and learning on these has been provided to the departments in question to identify concerns and assist with future training, mentoring and induction processes for researchers.

ii. Allegations considered by the Proctors' Office

In 2019, 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 or essays). These are summarised below (there were three 'carry forward' cases from 2018: numbers 1-3).

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 Academic Conduct Panel (ACP) or Student Disciplinary Panel. These cases were therefore returned to the examiners for finalising in the normal way (or results stood if the award was already conferred).

No	Nature of allegation	Outcome
1.	Plagiarism	FHS dissertation – SDP upheld – mark of 0, resubmit, cap at pass
2.	Plagiarism	PGDip final project – ACP upheld – mark of 0, resubmit, no cap
3.	Plagiarism	MSc thesis – not upheld
4.	Plagiarism	PGDip final project - ongoing
5.	Plagiarism	PGDip final project - ongoing
6.	Self-plagiarism	PGDip final project – ACP upheld – mark of 0, resubmit, cap at pass
7.	Plagiarism	PGDip extended essay - ongoing
8.	Plagiarism	PGDip extended essay – ACP upheld – mark of 0, resubmit, cap at pass
9.	Plagiarism	MSc extended essay – not upheld
10.	Plagiarism	PGDip extended essay – not upheld
11.	Self-plagiarism	MSt dissertation – ACP upheld – deduction of 5 marks
12.	Plagiarism	MSc dissertation – ongoing
13.	Plagiarism	MSc dissertation – ongoing

For new cases received after 1 October 2019, the Proctors are now able to make 'upheld' decisions previously made by the ACP, with a right of appeal to an Academic Conduct Appeal Panel) – <u>University</u> Statute XI: Part C, s 35/36.

As no such Proctors' decisions have yet been made, there is no reference to this process in the cases summarised above.

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 Personnel Services, the Proctors' Office, Council Secretariat and IT Services.

It was discussed and approved at a meeting of the University's Research and Innovation Committee on 5 March 2020.

Annex A

Policies and procedures for supporting and promoting research integrity

The University's <u>Academic Integrity in Research: Code of Practice and Procedure</u> 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 it 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 (updated in 2019)
- Policy on the use of animals in scientific research
- <u>Policy and procedure on conflict of interest</u> (updated in 2019)
- Public interest disclosure (whistle-blowing) code of practice
- Policy on the management of data supporting research outputs
- Open Access publications policy
- Financial Regulations
- <u>University statement of health and safety policy</u>
- Intellectual property policy (updated in 2019)
- Harassment Policy
- Anti-bribery Policy
- Anti-fraud policy
- Information Security policy
- <u>University policy on data protection</u>
- Export control guidance on export control legislation
- <u>Safeguarding Code of Practice</u>

These policies are subject to ongoing 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 <u>on the Research Support website</u>.