

# University of London

## Research Integrity Annual Statement 2019

### 1. Background

1. In July 2012, Universities UK published the Concordat to Support Research Integrity (July 2012), a comprehensive national framework for good research conduct and its governance. HEFCE, NIHR, RCUK and the Wellcome Trust are included among its signatories, and HEFCE has stipulated that compliance with the Concordat is a condition of the HEFCE grant from 2016/17.
2. The Concordat's 5<sup>th</sup> commitment requires in particular that the University should present a short annual statement to its governing body that:
  - a) Provides a summary of actions and activities that have been undertaken to support and strengthen understanding and application of research integrity issues;
  - b) Provides assurances that the processes they have in place for dealing with allegations of misconduct are transparent, robust and fair, and that they continue to be appropriate to the needs of the organisation;
  - c) Provides a high-level statement on any formal investigations of research misconduct that have been undertaken.
3. To improve accountability, and provide assurances that measures being taken continue to support consistently high standards of research integrity, this statement will be made publicly available here  
<https://sas.ac.uk/research/research-office/research-integrity-policy>
4. In 2018, the University issued its first statement focusing on the School of Advanced Study only. The 2019 Statement aims to recognise all departments which undertake research.

### 2. Governance

1. The University has three departments, which undertake research and studies, called Central Academic bodies (as noted in Ordinance 11):
  - The School of Advanced Study
  - The University of London in Paris
  - The University of London Worldwide
2. Review of research policy is undertaken via the university governance structure as follows:
  - The School of Advanced Study's Research Committee, which acts on behalf of the University of London, reviews and develops Research Policies on behalf of the University;
  - The School of Advanced Study's Research Ethics Committee, which also acts on behalf of the University of London, reviews and develops policies on behalf of the University and reports to the School Research Committee;
  - The School of Advanced Study's Academic Quality and Standard Committee which assures the quality of the teaching and supervisory experience for the School;
  - The University of London Worldwide's Academic Committee is responsible for ensuring that existing quality assurance mechanisms are appropriately applied to

assure the standard of the University of London award and reviews reports on allegations of assessment offences;

- Programmes taught at the University of London in Paris are subject to QMUL regulation and oversight. Internal committees such as Student-Staff Liaison Committee, a Learning and Teaching Committee, and regular Departmental and Research meetings, all feed into the Research Advisory Board.

3. All Committees report to the respective Central Academic Boards Policies. The relevant institutional policies for research integrity are as follows:

- **Code of Good Practice in Research**, publicly-accessible here: <https://www.sas.ac.uk/research/research-office>

The Policy, including the process for investigating allegations of academic misconduct by staff and non-staff, is being revised.

- **Student Academic Misconduct Policy**, publicly available here: <https://www.sas.ac.uk/sites/default/files/files/Policies/Academic%20Misconduct%20Policy.pdf>
- **Research Ethics Policy**, publicly-accessible here: <https://www.sas.ac.uk/research/research-office/research-ethics>

Amendments to the existing policy were agreed during academic year 18/19. Further discussion on policy implementation will continue in academic year 19/20. **Data Protection Policy**, publicly accessible here: <https://london.ac.uk/about-us/how-university-run/policies/data-protection>

- **Research Data management policy**, publicly accessible here: <https://sas.ac.uk/research/research-office>

The Policy is being revised. A new policy on preservation and archives is being written.

- **Academic Research and Data Protection Policy and guidance** have been approved by the Research Ethics Committee. They are now due to be considered by the Research Committee before being recommended for approval by the School Board. Once approved, the policy will be published
- **Social Media Policy**, not currently publicly available, due to revisions to address academic use of social media platform.
- **Employment Policies**, publicly available here: <https://london.ac.uk/about-us/how-university-run/policies>
- **Guidance for Students on Preventing and Responding to Harassment**, publicly available here: <https://london.ac.uk/sites/default/files/governance/University-of-London-Guidance-for-students-on-preventing-and-responding-to-harassment.pdf>

4. Those policies set out the standard of expectations for all researchers working under the auspices of the University.

- a. The policies are reviewed formally every three years or when new Government policy dictates earlier revision.
- b. Any revision of these policies is done through consultation. The policies are reviewed and approved by relevant internal committees. Employment policies are reviewed by the Human Resources Department and are subject to consultation by recognised trades unions..

- c. Communication of these policies is done in several way including:
  - o Staff and student handbooks,
  - o Intranet communications and briefings,
  - o Inductions and staff meetings
  - o Staff and Student trainings (face to face and online)

### **3. Key Achievements 2018-19**

1. In May 2018, while preparing of the institutional research integrity compliance statement, a self-assessment exercise of our current policies and practices based on the UKRIO self-assessment tool was undertaken and the following recommendations were made and agreed by the Research Committee, the School Board and subsequently the Board of Trustees:

- a. The need for cross-referencing between all existing policies;
- b. Additional material and resources are required to increase awareness of policy and procedure to students and supervisors – the Research Ethics Committee has recommended the use of the Virtual Learning Environment platform for this;
- c. Additional roadmaps of our practices will be made publicly available and will be circulated to cover ethical approval, as well as relevant practice related to the new data protection regulations (GDPR);
- d. The statement on misconduct in the Code of Good Practice in Research requires some revision;
- e. The statement on penalties, if ethical approval is not sought, requires further clarification;
- f. There is a need to strengthen = internal monitoring systems;
- g. The School should review how to communicate individual details on allegations of misconduct when/if funders require such information;

2. The statement and recommendations were subsequently presented to and approved by the Board of Trustees, where an action plan was requested. Key achievements into establishing a research integrity framework for the University so far are noted below:

Recommendations	Actions	Responsible	Progress Report
<p>1. There is a need for cross-referencing between all the existing policies;</p>	<ol style="list-style-type: none"> <li>1. Clarify relevant statements and procedures (including investigations) within the employment terms and conditions for academic staff ;</li> <li>2. Clarify relevant statements and procedures (including investigations) within terms and conditions of students;</li> <li>3. Align the Code of Good Practice in Research to refer to HR and Students' terms and conditions</li> <li>4. Align Research Ethics Policy to also refer to HR and Students' terms and conditions</li> <li>5. A much wider exercise needs to take place for SAS fellows</li> <li>6. Alignments will include ULIP, UOLWorldwide and SHL. Implications for such departments should be reviewed and contact points should be defined</li> </ol>	<ul style="list-style-type: none"> <li>• Head of Management Information and Research Services (HMIRS) to discuss with HR</li> <li>• HMIRS to discuss with Head of Registry Services, Chair of the Research Ethics Committee and SAS DCE</li> <li>• HMIRS to review with Chair of Research Committee</li> <li>• HMIRS to review with Chair of the Research Ethics Committee</li> <li>• HMIRS to discuss with SAS DCE</li> <li>• HMIRS to coordinate with ULIP, UOLWorldwide and SHL.</li> </ul>	<ol style="list-style-type: none"> <li>1. Review of the relevant internal policies has taken place as well as consultation with Registry and HR.</li> <li>2. The Research Ethics Committee has approved a set of proposals to improve the implementation of the Research Ethics policy including further clarity in student terms and conditions...</li> <li>3. The Code of Good Practice for Research is being revised to ensure appropriate cross-referencing.</li> <li>4. The Process to deal with allegations of misconduct is also being reviewed to ensure appropriate cross referencing. This has not yet been submitted for approval whilst we await the results of the consultation on the Concordat of Research Integrity.</li> <li>5. We have not yet reviewed the policies concerning fellowship terms and conditions. A clear communications channel has been established with ULIP and UOLWorldwide and reporting schedules agreed</li> </ol>
<p>2. Additional material and resources are needed to increase awareness to students and supervisors – the Research Ethics Committee has recommended the use of the Virtual Learning Environment platform for this;</p>	<ol style="list-style-type: none"> <li>1. A section on the School's studyonline platform should be developed, once all the policies and procedures have been agreed and aligned as noted above;</li> <li>2. This section should be accessible to members of ULIP and Worldwide</li> </ol>	<ul style="list-style-type: none"> <li>• HMIRS to coordinate with Registry when ready</li> </ul>	<ol style="list-style-type: none"> <li>1. The online platform has been developed and is currently being amended as per the feedback received from members of the Research Ethics Committee.</li> <li>2. All appropriate members of the University will have access.</li> </ol>

	3. Supervisors' access may need to be confirmed		3. The technicality of ensuring external Supervisors' access has not yet been discussed
3. Additional roadmaps of our practices will be made publicly available and will be circulated to cover ethical approval, as well as relevant practice related to the new data protection regulations (GDPR);	1. Roadmaps will be created by the Research Services and Legal Services to support awareness of procedures and policies through visual means.	<ul style="list-style-type: none"> <li>• HMIRS to coordinate with Data Protection and Information Compliance Manager and the Chair of the Research Ethics Committee</li> </ul>	1. The roadmap has been created. It will be published in the summer 2019
4. The statement on misconduct in the Code of Good Practice in Research requires some revisions;	1. The Code of Good Practice in Research will be reviewed and revisions will be sent to the Research Committee for approval.	<ul style="list-style-type: none"> <li>• HMIRS to review with Chair of Research Committee</li> </ul>	<ol style="list-style-type: none"> <li>1. The Code of Good Practice in Research is being revised to ensure appropriate cross-references.</li> <li>2. The Process to deal with allegations of misconduct is also being reviewed to ensure appropriate cross-referencing although not yet submitted for approval whilst we await the results of the consultation on the Concordat of Research Integrity.</li> </ol>
3. The statement relating to any penalties to be applied if ethical approval is not sought, requires further clarification;	1. To review the statement and implementation with the Chair of the Research Ethics Committee	2. HMIRS to review with Chair of the Research Ethics Committee and Pro dean Postgraduate	1. Proposals, which cover SAS students only in the first instance, have been agreed by the Research Ethics Committee. They have now been sent out for consultation and will be forwarded to the AQSC for approval.
4. There is a need to strengthen internal monitoring systems;	<ol style="list-style-type: none"> <li>1. To establish a more integrated monitoring system through <ol style="list-style-type: none"> <li>a. peer review for grant applications</li> <li>b. internal work in progress community</li> <li>c. supervisors' review of papers</li> </ol> </li> <li>2. To establish what kind of data we would require to evidence and report on the monitoring</li> </ol>	<ul style="list-style-type: none"> <li>• HMIRS to coordinate with the Research Committee and Research Ethics Committee for advice, the academic forum and other staff for a as appropriate</li> <li>• HMIRS to review how other university departments are managing their monitoring systems;</li> <li>• HMIRS to coordinate with relevant departments on</li> </ul>	<ol style="list-style-type: none"> <li>1. The Research Ethics Committee agreed that peer reviews should include an element of ethical assessment where possible</li> <li>2. Mentorship schemes continue to support work in progress;</li> <li>3. Supervisors' involvement has been reinforced as no paperwork is now accepted without the supervisor's signature.</li> </ol>

	<p>system, and the format in which this should be provided.</p> <ol style="list-style-type: none"> <li>3. To evaluate the implications on current resources of the implementation of this action and how the other departments would need to be involved.</li> <li>4. To review the level of information that can be shared and in which circumstances</li> </ol>	<p>resource implications as well as clarify clear expectations of their involvement</p> <ul style="list-style-type: none"> <li>• HMIRS to coordinate with Data Protection and Information Compliance Manager</li> </ul>	<ol style="list-style-type: none"> <li>4. Monitoring data and formatting has been established for all three departments;</li> <li>5. Internal auditors made some suggestions regarding monitoring methodologies, but resourcing them present a clear problem. This and the review of the implications on the resources is being pushed back to next year until all the proposals are implemented.</li> <li>6. The review of information that can be shared has not yet taken place.</li> </ol>
<ol style="list-style-type: none"> <li>7. The University should also review how to communicate any individual details of allegations of misconduct when/if funders require such information.</li> </ol>	<ol style="list-style-type: none"> <li>1. Principle and procedure to be agreed with HR, and confirmed with the Research Committee and Research Ethics Committee</li> </ol>	<ul style="list-style-type: none"> <li>• HMRS to coordinate the discussions with HR department, SAS DCE and Data Protection and Information Compliance Manager and to present proposals to the Research and Research Ethics Committees</li> </ul>	<ol style="list-style-type: none"> <li>1. Consultations with HR have taken place and it was agreed that no changes to the current procedures needed to take place.</li> <li>2. However, it was agreed to make the process of investigating the allegations of misconduct and communicating the results clearer. As noted below, the policy is being revised and will aim to be in line with the new Concordat and UKRIO's guidance.</li> </ol>
<ol style="list-style-type: none"> <li>8. Since the Assessment was undertaken, the Research Committee noted that the University did not have a specific safeguarding policy and protocols, which particular funders were now demanding.</li> </ol>	<ol style="list-style-type: none"> <li>1. Policy and protocols to be agreed with HR, and confirmed with the Research Committee and Research Ethics Committee.</li> </ol>	<ul style="list-style-type: none"> <li>• HMRS to coordinate the discussions with HR department, and SAS DCE and Chair of the Research Ethics Committee and present draft policy and proposal to the Research and Research Ethics Committees</li> </ul>	<ol style="list-style-type: none"> <li>1. It was established that while there was no specific safeguarding policy, such matters were covered in various other policies the contents of which could be brought together.</li> <li>2. The resultant drafting has yet to be undertaken.</li> </ol>

#### 4. Statement for 2018-19

Academic misconduct is reported annually. Each department's statement is as follows:

1. University of London in Paris:
  - There had not been any ULIP-registered PGR students through the period 2016-2018.
  - The MA in Urban History and Culture, which is a University of London award, was approved in 2016-2017, in partnership with QMUL. 3.5 FTE in 2018-19.
  - No academic misconduct involving staff or students has been recorded.
  
2. School of Advanced Study:
  - The 17-18 report indicates that 232 students were registered (94 PGT and 138 PGR);
  - The 18-19 report indicates that 254 students were registered (91 PGT and 163 PGR);
  - It should be noted that the School has drafted a code of conduct for research degrees which is currently being taken through the governance process.
  - No academic misconduct involving staff or students has been recorded.
  
3. UOLWorldwide
  - The University of London Worldwide's Academic Committee considers the University of London Assessment offence report, which includes students attending the School's programmes as well as programmes led by colleges within the Federation. This Report only focuses on students registered to the Central University of London and its own departments only.
  - The Global MBA programme commenced in April 2017, with four intakes per calendar year (January, April, July and October). The Strategic Project [BAM900] module is the only part of the programme that involves primary data collection. The Strategic Project module is currently running for the third time. In July 2018, the Module run for the first time. It started with 12 students, the second intake had 15 students.
  - No academic misconduct involving staff or students has been recorded.

6.06.19

Head of Management Information and Research Services.

Statement was approved by Chair's action, Professor Jo Fox, on behalf of the Research Committee.