University of Exeter annual statement on research integrity

Section 1: Key contact information

Question	Response
1A. Name of organisation	University of Exeter
1B. Type of organisation: higher education institution/industry/independent research performing organisation/other (please state)	Higher education institution
1C. Date statement approved by governing body (DD/MM/YY)	10 December 2024
1D. Web address of organisation's research integrity page (if applicable)	https://www.exeter.ac.uk/departments/cgr/researchethics/integrity/
1E. Named senior member of staff to oversee research integrity	Name: Professor Krasimira Tsaneva-Atanasova, Vice-President and Deputy Vice-Chancellor (Research and Impact)
	Email address: dvc-research@exeter.ac.uk
1F. Named member of staff who will act as a first point of contact for anyone wanting more information on matters of research integrity	Name: Antony Walsh
	Email address: a.walsh3@exeter.ac.uk

Section 2: Promoting high standards of research integrity and positive research culture. Description of actions and activities undertaken

2A. Description of current systems and culture

Please describe how the organisation maintains high standards of research integrity and promotes positive research culture. It should include information on the support provided to researchers to understand standards, values and behaviours, such as training, support and guidance for researchers at different career stages/ disciplines. You may find it helpful to consider the following broad headings:
- *Policies and systems*
- *Communications and engagement*
- *Culture, development and leadership*
- *Monitoring and reporting*

Policies and systems

The University of Exeter is committed to 'the highest standards of scientific, scholarly and professional integrity and to give due consideration to the ethical, social and environmental issues arising from its activities'. The institutional *Strategy 2030* declares that 'Our research excellence will be underpinned and enhanced by an open, ethical and supportive research culture and environment'.

The University has established and continues to articulate its key standards for research integrity in three main documents:

1. *The Code of Good Practice in the Conduct of Research*

2. *The Procedure for Investigating Allegations of Misconduct in Research*

3. *The Research Ethics Framework*

Other related policies and processes include:

- the *Dignity and Respect Policy*

- the *Public interest disclosure procedure* ("Whistleblowing") & the *Public interest disclosure policy*

- the *Conflict of Interest Policy*

Institutional processes and systems specifically relating to research integrity are overseen by the Research Ethics, Governance and Compliance (RECG) Team who are part of Compliance and Risk within University Corporate Services.

The RECG team comprises of support for four broad functions across the entirety of the university:

Research ethics (human and animal)

Supported by:

- 2.6 Research Ethics Officers,

- a Senior Research Ethics Advisor (Home Office and AWERB)

Export Controls, sanctions and support for compliance with international research requirements

Supported by

- Partnership and International Research Compliance Manager

Health and Social Care research support (including 'sponsorship')

Supported by:

- Senior Clinical Research Governance Manager,

- Senior Research Governance Officer,

- a Research and Human Tissue Administrator

Research Integrity (including allegations of research misconduct)

The university has nine research ethics committees (RECs) predominantly for research with human participants and an Animal Welfare and Ethics Review Board (AWERB). These 10 groups report to the Research Executive and Impact Committee which is responsible for oversight of ethics review in accordance with the terms of the *Research Ethics Framework.*

The REGC team supports each REC, undertaking 'triage' to identify legal and research governance issues.

The Health and Social Care team provides in depth support to all researchers whose activities fall under the *UK Policy Framework for Health and Social Care* Research including CTIMPs (Clinical Trials of Investigational Medicinal Products) and regulated medical device studies.

The Partnership and International Research Compliance Manager provides expert advice across the research community on risks associated with international partnerships and collaborations in specialist areas such   export controls, sanction checks and oversight of the requirements for the Nagoya Protocol and CITES.

The Head of Research Governance, Ethics and Compliance oversees the reporting, investigation and record keeping for research misconduct related issues.

Communications and engagement

The RECG team engages in training (formal and informal) across the academic year. Access to online Research Integrity training is available to academic staff and doctoral students through the LearnUpon online training portal.

Upon invitation for specific matters, the Head of Research Ethics, Governance and Compliance attends the Research and Impact Executive Committee (RIEC) that has statutory responsibility for research ethics and integrity. Occasional invitations are also extended from the Doctoral College Board as and when required.

The Head of Research Ethics, Governance and Compliance uses the University communication networks (for example the University Weekly Bulletin) to publicise training and updates across the Research Community.

Direct communication is also made with the Directors of Faculty Operations and case processes are used within the faculty.

The Head of Research Ethics, Governance and Compliance is a member of the University Compliance Committee, which oversees all compliance related matters in relation to research.

Culture, development and leadership

Beyond the REGC team, the University is committed to a range of activities and initiatives that contribute to the overall integrity of research through policies and support for Open Research (University Library); Reproducibility; and support for the career development of Early Careers Researchers (ECRs) (Doctoral College).

The details of activities undertaken in 2023-24 are given in section 2b below.

Monitoring and reporting

> The terms of reference of the Research and Impact Executive Committee include oversight of research ethics and integrity.
>
> Matters that relate to legislation and have formal regulatory and inspection regimes are monitored by the Compliance Committee.

2B. Changes and developments during the period under review
Please provide an update on any changes made during the period, such as new initiatives, training, developments, also ongoing changes that are still underway. Drawing on Commitment 3 of the Concordat, please note any new or revised policies, practices and procedures to support researchers; training on research ethics and research integrity; training and mentoring opportunities to support the development of researchers' skills throughout their careers.

The **Research Ethics, Governance and Compliance team** has carried out a full review of activities in 2023/24 and developed a programme of work area for continual improvement, The following initiatives were pursued in 2023-24:

- Introduction of a new *Procedure for the Investigation of Allegations of Misconduct in Research* (see section 3A below)

- Updating of the Code of Good Practice in the Conduct of Research

- Launch of a video on export controls and sanctions to alert researchers on key considerations of the trusted research agenda within international collaborations which was cascaded across the research community.

- Setting up of a new Sponsorship Oversight Group to give effective institutional ownership of clinical research governance to meet key external stakeholder expectations

- The commencement of an overarching Quality Management System (QMS) to support all forms of clinical research that is subject to Health Research Authority (HRA) governance, including CTIMPs

- Tthe creation of an evaluation toolkit –a SharePoint tool to assist researchers undertaking service evaluations and audits to assess and negotiate ethical and research governance aspects at an early stage of research design

  - Recruited a new Senior Research Ethics Advisor (Home Office and AWERB) post to further strengthen governance arrangements in this area A total of 10 two-hour training workshops in research ethics took place for doctoral students and ECRs across the 2023-24 academic year. Another three sessions took place on the core principles of research integrity. Ad hoc, bespoke training took place in the areas of sponsorship (clinical research) on request to support small cohorts with specific requirements.

The **Open Research team** in the library has provided on-going training, advocacy, and support for open access compliance to promote transparency and openness in research, contributing to a culture of research integrity. This has involved:

- The team has developed and implemented a Rights Retention policy to ensure researchers retain sufficient reuse rights over their work, allowing them to publish in subscription or hybrid journals while also making their manuscripts available openly through self-deposit.

- Support has been put in place for researchers to benefit from the UKRI Open Access policy which requires monographs, book chapters, and edited collections published from January 1, 2024, to be made openly available within 12 months of publication

> under a Creative Commons licence (preferably CC BY, with alternative licences permitted).
>
> • Continued active involvement with training researchers to improve awareness about responsible practices related to open access publishing & research data management, alongside supporting the work of GW4 & UKRN, including contributing to the delivery of the first joint GW4 Open Research week in November 2023.
>
> The **Researcher Development and Research Culture team** has led on activities in support of the maintenance of the standards expected through the HR Excellence in Research Award. This has included:
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> • Establishment of revised representation structure for Early Career Researchers (ECRs), including the recruitment of new representatives, with direct avenues for ECRs to get their voices heard at RIEC.
>
> • Continuing to develop leadership and people management induction and development
>
> • Programmes for existing and aspiring academic leaders. This has included a cohort on the Researcher Leadership Development Programme
>
> • Ongoing raising of awareness of wellbeing and mental health for researchers, including workshops on health resilience for researchers, dealing with impostor syndrome, and emotional agility as a researcher;
>
> • Promoting and encouraging researcher participation in Positive Working Environment activities
>
> • The creation of a new series of on-campus ECR 'town hall' meetings to bring the ECR community together and encourage collaborations and sharing of experiences
>
> In the field of **responsible research metrics**, in 2023-24 :
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> • The Responsible Metrics Champions Group (RMCG) has worked closely with the University Exeter Board with a view to becoming an institutional signatory to the Coalition for Advancing Research Assessment (CoARA).
>
> • Relating wider research culture initiatives and the broader scope of CoARA Commitment, the RMCG is considering practice regarding the use of rankings in both internal and external communications to ensure that the university does not promote/cite rankings based on poor metrics. The RMCG is also working with colleagues in Internal Communications for a campaign to raise awareness of Research Culture through features in the Weekly Bulletin. This will take the format of a different focus each week, hopefully with some talking heads. The campaign will also encourage research colleagues to submit examples of positive research culture behaviours to share or celebrate.

2C. Reflections on progress and plans for future developments

This should include a reflection on the previous year's activity including a review of progress and impact of initiatives if known relating to activities referenced in the previous year's statement. Note any issues that have hindered progress, e.g. resourcing or other issues

Following a business case the RECG team will be see the following enhancements for the 2024-25 academic year:

• An additional Research Ethics Officer

- an administrator to support Trusted Research and International Research Compliance

- an administrator to support clinical research governance (sponsorship)

The addition of these posts will increase team resilience and provide greater opportunities to enhance policies, practices and standards required for a research intensive university.

Key planned policy and processes include:

- A review of the Ethics Committee Structure, considering options to reform and reconfigure this with the aim of reducing variations in standards and expectations, enhancing the quality of review and minimise delays to researchers in setting up research studies.

- Make updates to the Ethics Review Framework.

- Further scheduled training within research development training programmes to cover specialised areas of research governance and legislation – export controls and trusted research, clinical research governance and additional research ethics and research integrity courses.

- Updates to the REGC's web pages to link to pre-existing SharePoint sites and pages and allow more direct access to key information and guidance for researchers.

- Implement an Audit programme in Clinical Governance and Home Office / AWERB area.

- Create and launch a Trusted Research Framework (TRF) Assessment tool, to support researcher to identify and manage risks.

- Develop a business case to support implementation of clinical governance mapping and tracking software (EDGE)

- Support the Compliance and Risk Team to create a Principal Investigator specific training programme.

- Support the Compliance and Risk Team to hold regular Department Manager meetings to discuss department level requirements and compliance.

Section 3: Addressing research misconduct

3A. Statement on processes that the organisation has in place for dealing with allegations of misconduct

Please provide:

- *a brief summary of relevant organisation policies/ processes (e.g. research misconduct procedure, whistle-blowing policy, bullying/harassment policy; appointment of a third party to act as confidential liaison for persons wishing to raise concerns) and brief information on the periodic review of research misconduct processes (e.g. date of last review; any major changes during the period under review; date when processes will next be reviewed).*

- *information on how the organisation creates and embeds a research environment in which all staff, researchers and students feel comfortable to report instances of misconduct (e.g. code of practice for research, whistle-blowing, research misconduct procedure, informal liaison process, website signposting for reporting systems, training, mentoring, reflection and evaluation of policies, practices and procedures).*

- *anonymised key lessons learned from any investigations into allegations of misconduct which either identified opportunities for improvements in the organisation's investigation procedure and/or related policies / processes/ culture or which showed that they were working well.*

A fully updated *Procedure for investigating allegations of misconduct in research* ('The Procedure') was launched following approval by RIEC, Senate and Council in January 2024.

The Procedure closely follows the recently updated model Procedure set out by the UK Research Integrity Office (UK RIO), namely a four-stage process – Receipt of Allegations, Initial Investigation, Full Investigation and Outcomes and Reporting. A further Appeals stage exists for claims where the specific criteria for an appeal against a decision have been met.

The Procedure permits Complainants to come forward anonymously if required (within the constraints of the specific allegations being raised).

At the receipt of allegations stage, an evaluation is undertaken to consider whether alternative institutional or external processes would be more appropriate (e.g. the Dignity and Respect Policy, direct referral to a disciplinary process or reporting to a regulator or the police).

The university has appointed the Vice-President and Deputy Vice-Chancellor (Research and Impact), Professor Krasimira Tsaneva-Atanasova as the institutional 'Named Person' who has responsibility for the oversight of actions taken under the Procedure, assisted by the Head of Research Ethics, Governance and Compliance who acts as the 'Research Integrity Officer'. The Human Resources division provides administrative support for individual cases as and when they arise.

During the 2023-24 academic year, the Head of Research Ethics, Governance and Compliance has attended meetings of academic faculties and professional services divisions to present the Procedure and provide a brief introduction to research integrity.

The Procedure will next be reviewed in 2026.

The Dignity & Respect Policy addresses all forms of bullying, harassment or victimisation of staff or students within the university. Staff or students may use the staff Grievance Procedure or the Student Complaints Procedure. Alternatively, mechanisms exist to report informally, or anonymously using 'Exeter Speaks Out'. This includes reporting from 'by standers' who have witnessed harassment, bullying, intimidation or discrimination.

The Public Interest Disclosure Procedure allows members of the university to make disclosures in the public and to raise at a high level concerns or to disclose information which the employee believes shows malpractice or impropriety. Disclosures are made to the Registrar and Secretary in their capacity as the University Secretary and 'designated person'. Upon receipt of a disclosure under this Procedure, the 'designated person' will immediately inform the Vice-Chancellor and Chair of the Council in writing. A panel may be convened if required to consider the matter raised. Depending on the nature of the disclosure, an upheld outcome may require referral to a disciplinary procedure, referral to the police, a disclosure to a funder or regulator or a recommendation or instruction to a manager.

With only one completed investigation within the academic year, opportunities for 'key lessons' are limited, however, as the first to make use of the completely updated 'Procedure', it has been reassuring to note that the process occurred smoothly and efficiently with all parties aware of actions and expectations.

3B. Information on investigations of research misconduct that have been undertaken

*Please complete the table on the number of **formal investigations completed during the period under review** (including investigations which completed during this period but started in a previous academic year). Information from ongoing investigations should not be submitted.*

An organisation's procedure may include an initial, preliminary, or screening stage to determine whether a formal investigation needs to be completed. These allegations should be included in the first column but only those that proceeded past this stage, to formal investigations, should be included in the second column.

Type of allegation	Number of allegations			
	Number of allegations reported to the organisation	Number of formal investigations	Number upheld in part after formal investigation	Number upheld in full after formal investigation
Fabrication	0	0	0	0
Falsification	0	0	0	0
Plagiarism	1	0	0	0
Failure to meet legal, ethical and professional obligations	0	0	0	0
Misrepresentation (eg data; involvement; interests; qualification; and/or publication history)	0	0	0	0
Improper dealing with allegations of misconduct	0	0	0	0
Multiple areas of concern (when received in a single allegation)	0	0	0	0
*Other**	0	0	0	0
Total:	**1**	**0**	**0**	**0**

*If you listed any allegations under the 'Other' category, please give a brief, high-level summary of their type here. Do not give any identifying or confidential information when responding.

A single allegation of misconduct in research, an allegation of plagiarism, was received in Biosciences within the 2023-24 academic year. Following the completion of the Initial Investigation stage, the allegation was not upheld, in accordance with the Procedure, and judged to be 'unfounded, because it is mistaken and without substance and should be dismissed'.