

# Annual Statement on Research Integrity

1<sup>st</sup> August 2023 to 31<sup>st</sup> July 2024

## Background

1. Research Integrity is a guiding principle for all research and impact activity at Bangor University (“University”), as set out in the University’s Strategy 2030 Document: *‘We act with honesty and transparency and will seek to collaborate in all we do. We will facilitate intellectual growth through academic freedom, creative expression and communication of truth, knowledge, social and moral development’*. The University is fully committed to upholding the principles and practices of the Universities UK Concordat to Support Research Integrity (“Concordat”)
2. This is the University’s fourth Annual Statement on Research Integrity (“Annual Statement”) covering the period 1st August 2023 to 31st July 2024. As recommended by the Concordat, this Annual Statement has been approved by the University Executive Committee and will be made publicly available on the University’s website. It will be noted by the University Senate and Council.
3. The Concordat obligates its signatories to prepare a short annual statement to their governing body, reporting:
  - (i) a summary of actions and activities that have been undertaken to support and strengthen understanding and the application of research integrity issues.
  - (ii) 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.
  - (iii) a high-level statement on any formal investigations of research misconduct that have been undertaken, which will include data on the number of investigations. If no formal investigation has been undertaken, this should also be noted.
  - (iv) 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; and
  - (v) 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.

## 4(i) Actions and activities undertaken

The University fully recognises the imperative to maintain the highest standards of research integrity and, therefore, seeks to comply with the Concordat, by monitoring and continuously promoting best practice. As part of this the University, and within the period of this statement, has begun a review of its research governance process. This has included:

1. Maintaining the role of Senior Research Governance & Policy Officer. Reporting to the University Secretary, the Officer has responsibility to oversee research governance centrally and to develop and manage policies, systems, and procedures, promote best practice, and support the University in meeting its obligations under the terms of the Concordat.

2. Maintaining the role of Associate Pro-Vice-Chancellor, as the academic-lead, to restructure the University's research integrity and governance arrangements, to improve support and training across the University's College, Schools, and research-active staff.
3. Continuing to oversee, review and embed research integrity and governance (including due diligence etc) as well as contracts, including commercialisation contracts and agreements, under Legal and Compliance Services and the University's Integrated Research and Impact Support Service (IRIS).
4. Maintaining a web-based research ethics management system to provide an integrated system for the University's research ethics review processes including both its human and animal portfolio. The system deployment has been led by an academic and professional services team consisting of the Pro-Vice Chancellor (Research) and Associate Pro-Vice Chancellor for Research Governance, the University's Digital Services supported by Legal and Compliance Services.
5. Under the leadership and management of IRIS, systems exist to support the management of major structural/infrastructure awards. For example, for some major research projects or for those with particular challenges, the University has regular project and programme boards to scrutinise returns to funders and monitor progress and performance.
6. Maintaining the Research Integrity Policy approved by the University Senate in September 2022. Cementing the five key principles of the Concordat to Support Research Integrity, the Policy also lays out the procedure for investigating allegations of research misconduct. The Policy and the Concordat apply to all University staff and students involved in research on behalf of Bangor University and are designed to provide researchers with standards and guidelines in relation to the conduct of high-quality and ethical research.
7. Included in the Research Integrity Policy is a procedure for investigating research misconduct. Concerns about or allegation of research misconduct can be brought to the attention of the Senior Research Governance & Policy Officer. In the first instance, the Officer will consider concerns or allegation on its merit, and if the situation requires, will instigate an investigation within 10 working days.
8. As part of the Research Integrity Policy, we have a number of School-level Research Integrity (RI) Leads. These individuals act as a local point of contact for staff and students, to promote and raise the profile of research integrity, signpost training, and support the university's research integrity training and policies within their College research institutes and Schools. Each individual provide advice to researchers (staff and students) about good research practice, research ethics and / or research integrity; and support staff who wish to raise concerns about research integrity. RI Leads are line managed by their College Deans of Research.
9. In response to the House of Commons Science and Technology Committee recommendations of July 2018 and the Government's recognition of the services provided by the UK Research Integrity Office (UKRIO), Bangor University is a UKRIO subscriber.
10. The University Research Ethics Policy has been designed to reflect current practices in relation to:
  - i) Sponsorship.
  - ii) Core concordat principles.
  - iii) External membership of university ARECs.

- iv) Categorising and streaming research involving human participants.
  - v) Use of external research ethics committee (e.g., for MoD or NHS-related research projects)
  - vi) Due diligence.
11. The policies on Research Integrity and Research Ethics will be coming up for review and it is expected they will be extended to reflect other current practices such as export control, artificial intelligence and modern slavery.
  12. Bangor University has invested in the Epigeum training packages *Research Integrity Second Edition UK* and *Ethical Research UK* for a period of 3 years. The online software has been made available to all PhD students and research staff.
  13. A Human Tissue Authority audit was conducted on university premises in February 2024 and some minor recommendations were incorporated into the standard operating procedures for handling human tissue.

#### **4.(ii) Assurance: Current policy, procedure, and guidance**

1. Research integrity is supported across the University. Legal and Compliance Services and IRIS work closely with Academic Colleges and Schools to ensure that policies and guidance are fit for purpose. This co-operation is key to strengthening research integrity.
2. The University recognises the importance of maintaining the highest standards of research integrity and seeks to comply fully with the Concordat to Support Research Integrity. Overall responsibility for research integrity and research governance rests with the Pro-Vice-Chancellor (Research). The design and operation of policies and good practice are the responsibility of the Senior Research Governance & Policy Officer.
3. The Pro-Vice Chancellor of each College, Heads of School and College Deans of Research are responsible for local research integrity arrangements, and periodically review the integrity processes within Schools and research units to ensure they remain fit for purpose. They must ensure that, in accordance with the Research Ethics Policy, that each College has established at least one Academic Research Ethics Committee (AREC), with an appropriate membership, terms of reference and process for monitoring and review of matters relating to research integrity. Otherwise, an agreement must exist to operate and review matters relating to research integrity through another appropriate AREC.
4. In addition, the Associate Pro-Vice Chancellor for Research Governance provides academic strategic direction for research governance with the Chairs of the Academic Research Ethics Committee. Heads of Schools are expected to take responsibility for ensuring appropriate strategic direction of research and that there is effective supervision of researchers within their Colleges and Schools, including initial advice on matters of research integrity and academic conduct, with concerns around academic misconduct being handled by Senior Research Governance and Policy Officer, Legal and Compliance Services.
5. The University Research Governance and Ethics Group is now a delivery group of the University Research Committee and is the overarching Committee at Bangor University for the consideration of research governance and ethical issues. The Group has devolved responsibility, from the Research Committee, for the ethical review and approval process in its three colleges to the relevant College AREC. The Colleges and Schools may, when appropriate, escalate issues to the Research Governance and Ethics.

6. Chairs of ARECs provide the University Research Governance and Ethics Group / Delivery Group with reports at each meeting, which will include submitting an annual report to the first meeting of the academic year. They can refer any matters of ethical concern to the Senior Research Governance & Policy Officer who serves as Secretary to the Research Governance and Ethics Group. Where appropriate, a working group of the Research Governance & Ethics Group, may be established to consider specific matters and to make recommendations.
7. The University Research Integrity Policy sets out guidelines on the issues involved in the proper conduct of research, and on the standards expected. The Policy includes a statement that the University requires all academic staff to maintain high standards of academic conduct and, in the context of research, be aware of the extreme seriousness of academic fraud, and to be alert to the need to avoid such conduct, whether by fabrication of research results, plagiarism or otherwise.
8. The Policy requires honesty, openness, accountability, and integrity are vital qualities for any academic researcher no matter what their discipline or level of experience.
9. It is expected that all research-active students and staff shall:
  - take steps to acquaint themselves with the Policy in relation to matters of conduct, finance, or safety relevant to their area of research.
  - observe such legal and ethical requirements as are laid down by the University or such other properly appointed bodies as are involved in their field of research.
  - take steps to secure the health and safety of those associated with the research.
  - report any conflict of interest, whether actual or prospective, to the appropriate authority; observe fairness and equity in the conduct of their research.
10. The university complies with all relevant statutory and external regulatory requirements including for example, the Animal Welfare Regulations, Human Tissue Regulations and Health and Safety at Work regulations.
11. The Animal Welfare and Ethical Review Body (AWERB) is responsible for the ethical review and approval of all research involving animals at the University as set out in the Animal Welfare and Ethical Review Process. The AWERB reports to the University Research Governance and Ethics Committee.
12. The key regulated area of Human Tissue is overseen and managed at a College level, with operational support being provided by Legal and Compliance Services. Any activity within the University that involves the use of organs, tissues, and cells (including saliva, blood etc. which contain cells), must follow strict Standard Conditions and researchers must ensure that their use of human tissue has been ethically approved through the Integrated Research Application System and that the appropriate consent is in place. Researchers wishing to undertake research involving human tissue must consult with the University's Human Tissue Designated Individual (DI) prior to the commencement of any research. Clinical research is reviewed and approved by the Health Research Authority and NHS Research Ethics Committees and all clinical trials are publicly registered.
13. Other key regulated areas are managed at their respective College level and have included approval, accreditation, or recognition from a diverse range of Professional, Statutory and Regulatory Bodies such as the Nursing and Midwifery Council, Health and Care Research Wales, Estyn, Advance HE, Chartered Management Institute and the Health and Care Professions Council.

14. The University seeks to comply fully with the requirements of GDPR including as it applies to research activity. Advice and guidance on matters relating to GDPR sits with the Head of Legal Services within Legal and Compliance Services and is closely linked to the research governance and ethics function. It is a condition of employment that staff will abide by the data protection rules and policies of the University. In particular, all staff must ensure that:
- all personal information entrusted to them in the course of their employment is kept securely.
  - no personal information is disclosed either verbally or in writing, accidentally or otherwise to any unauthorised third party.
  - no personal information should be accessed by staff for any reason other than for legitimate University business.
  - any information that they provide to the University in connection with their own employment is accurate and up to date and that they inform the University of any changes, e.g., changes of address.
15. In terms of training, the University is also a signatory of the Researcher Development Concordat and, since 2015, has run a working group to implement, embed and promote the principles of this Concordat and to promote best practice, for example, in the training of Early Career Researchers. The group brings together key support staff as well as academic representatives from across the University and reports directly to the University's Research Committee
16. The Senior Research Governance & Policy Officer and the Associate Pro-Vice-Chancellor will ensure coaching on research integrity related topics will be available through the University's HR Staff Induction Development Programmes.

#### **4. (iii) Statement on formal investigations of Academic Research Misconduct**

1. During the 2023/24 academic year to date, no allegations were taken forward to a formal investigation.
2. During the 2022/23 academic year, no allegations were taken forward to a formal investigation.
3. During the 2021/22 academic year, an informal investigation from the previous year around disputed scientific nomenclature was referred to the UKRIO for advice. No evidence was provided to warrant an investigation into research misconduct. There was also an investigation into an apparent failure to secure ethical review for Masters-level research project which, in fact, reflected administrative errors rather than malpractice.
4. During the 2023-24 Academic Year, one complaint about a staff member and research integrity around ownership of a piece of intellectual property was carried forward from the previous year for additional consideration. No evidence was provided to warrant an investigation into research misconduct and a parallel investigation conducted by the NHS concluded there was no basis for the complaint.
5. During the 2022-23 Academic Year, three complaints about staff research integrity were received. No evidence was provided to warrant an investigation into research misconduct. However, informal investigations resulted in advice being given on authorship, IP ownership and unambiguous website content.
6. A table has been assigned in Annexe 1 for the past 3 completed academic years with year 1 representing the most recently completed year.

#### **4. (iv) Lessons learned from investigations of research misconduct that have been undertaken**

1. The University bases its processes for undertaking investigations on the guidance provided by UKRIO and draws on connections with the wider research management community to inform any refresh to our policies. The University remains vigilant and takes seriously any allegation and as supporters of the concordat to support research integrity, we are committed to:
  - maintaining the highest standards of rigour and integrity in all aspects of research.
  - ensuring that research is conducted according to appropriate ethical, legal, and professional frameworks, obligations, and standards.
  - supporting 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.
  - using transparent, robust, and fair processes to deal with allegations of research misconduct should they arise.
  - working together to strengthen the integrity of research and to reviewing progress regularly and openly.

However, the low incidence of reports of research misconduct in Annexe 1 has highlighted a need to review the arrangements for research integrity training, awareness and training.

2. The procedure is continuously monitored by the Senior Research Governance and Policy Officer. Review and, where necessary improvement, of research misconduct processes will continue to form part of the University's review of research governance and integrity arrangements. This includes for example, liaising with Human Resources in disciplinary matters to ascertain whether any research misconduct might have taken place or could potentially have been overlooked.

#### **4. (v) Embedding a research environment that encourages openness and willingness to report instances of misconduct and preparation of this statement.**

1. The University Academic Integrity Procedure and Research Integrity Policy promote an awareness of the need to maintain high standards of academic and research conduct in terms of positive characteristics of honesty, openness, accountability and integrity, as vital qualities for any academic researcher no matter what their discipline or level of experience. A process is under way to look at the research culture and ensure all the relevant policies and procedures are relevant and coherent.
2. This statement was updated by the Senior Research Governance and Policy Officer with input from the Associate Pro-Vice Chancellor for Research Governance, the Pro Vice-Chancellor (Research), the University Secretary, and the Head of Research and Impact Support.
3. The statement was presented and approved by the University's Executive.

**Paul Spencer, Pro Vice-Chancellor (Research)**

**Gwenan Hine (University Secretary)**

**Colin Ridyard (Senior Research Governance and Policy Officer)**

**With contributions from Robert Rogers, former Associate Pro-Vice Chancellor for Research Governance**

**June 2025**

## Annexe 1

- Figures are provided for the past 3 completed academic years with year 1 representing the most recently completed year.
- “Formal investigation” is as described in the UKRI Policy and Guidelines
- Investigations should be split by Research Council, and by type (as defined in the integrity section of the UKRI webpage)

Year	Fabrication		Falsification		Plagiarism		Misrepresentation		Breach of duty of care		Improper dealings of allegations of misconduct		other	
	completed	upheld	completed	upheld	completed	upheld	completed	upheld	completed	upheld	completed	upheld	completed	upheld
1							1**	0						
2	0	0	0	0	0	0	1*	0	0	0	0	0	1*	0
3	0	0	0	0	0	0	1*	0	0	0	0	0	1*	0
4	0	0	0	0	0	0	0	0	0	0	0	0	0	0

\*Refer to informal investigations. \*\*Refers to an informal investigation carried forward from Year 2