POLICY ON RESEARCH INTEGRITY

Date	Purpose of Issue/Description of Change	Equality Impact Assessment Completed
14th January 2022	Initial Issue	
28th July 2023	Update Policy Officer and Senior Responsible Officer	

Policy Officer	Senior Responsible Officer	Approved By	Date
Head of Legal Services	University Secretary	Chair, Research Governance & Ethics Committee	24th May 2022

This Policy will be reviewed in 3 years

1. Introduction

This document sets out the policy for managing research integrity at Bangor University. Recognising the importance of maintaining the highest standards of research conduct, the University is a signatory of, and complies with, the *Concordat to Support Research Integrity*[1]. This concordat provides a comprehensive national framework for good research conduct along with a commitment to:

a) Maintaining the highest standards of rigour and integrity in all aspects of research.
b) Ensuring that research is conducted according to appropriate ethical, legal and professional frameworks, obligations and standards.
c) 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.
d) Using transparent, robust and fair processes to deal with allegations of research misconduct should they arise.
e) Working together to strengthen the integrity of research and to reviewing progress regularly and openly.

The Policy and the Concordat apply to all University staff and students involved in research on behalf of Bangor University and includes staff and students conducting research from outside the University, as well as any persons not employed by the University but with honorary contracts or permission to carry out research on University sponsored projects (all referred to as Researchers). The policy covers all research at Bangor University as well as any work disseminated. Dissemination includes publication in a journal or book, information placed on the web, conference presentations or any other kind of public communication. The Research Integrity Policy does not apply to work routinely done as part of a course module or other coursework covered by the *Academic Integrity Procedures*.[2]

The Concordat is designed to provide researchers with standards and guidelines in relation to the conduct of high-quality and ethical research. The University is fully committed to upholding this purpose and this Policy provides a framework to allow this to happen and to support staff in their research activities and the development of the most effective research environment possible. The specific policies to meet the five commitments are set below in Section 5.

[1] https://www.universitiesuk.ac.uk/sites/default/files/field/downloads/2021-08/Updated%20FINAL-the-concordat-to-support-research-integrity.pdf [2]
[2] https://www.bangor.ac.uk/regulations/procs/proc05.php.en

2. Responsibilities

a) Pro Vice-Chancellor (Research)

The Pro Vice-Chancellor (Research) is responsible for the overall management of research.

b) Deans of College / Heads of School / Research Institute Directors

Deans of College, Heads of School and Research Institute Directors are responsible for local research integrity arrangements, and periodically reviewing integrity processes within Research Institutes and Schools, to ensure these remain fit for purpose. They must ensure that, in accordance with the Research Ethics Policy, at least one Academic Research Ethics Committee (AREC), which meets the needs of their College, Institute, and its constituent Schools, has been established 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.

c) Researchers

All those engaged with research have a duty to consider how the work they undertake, host or support affects society and the wider research community. The implementation of the Commitments set out in this policy will demonstrate to the public, government, funders, third sector, business and international partners that they can continue to have confidence in the research produced in Bangor University and enhance the University's reputation for high-quality and ethical research. To this end, researchers have a role to play in adopting best practice in research integrity, ethics, and good practice.

d) Governance Services

Governance Services are responsible for the *Research Integrity Policy* and for periodically reviewing and updating the Policy to ensure it remains fit for purpose, helping to ensure the University promotes and embeds a commitment to research integrity with suitable processes in place to deal with misconduct.

In line with the Concordat to Support Research Integrity, the University will produce a short *Annual Statement on Research Integrity* which is approved by the University Council and made publicly available through the University website[3]. This Annual Statement will give:

[3] https://www.bangor.ac.uk/governance-and-compliance/documents/research-integrity.pdf

i. A summary of actions and activities that have been undertaken to support and strengthen understanding and the application of research integrity issues (for example postgraduate and researcher training, or process reviews);
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;
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.

3. Research Integrity Definitions[4]

Definitions in relation to research integrity used both within this Policy and within the Concordat include:

A. **Research integrity:** whilst there is no universal classification of research integrity, the Five Commitments included in the *Concordat on Research Integrity* form the University's working definitions. The University's approach to each Commitment is set out below.

i. **Honesty:** in all aspects of research, including in the presentation of research goals, intentions and findings; in reporting on research methods and procedures; in gathering data; in using and acknowledging the work of other researchers; and in conveying valid interpretations and making justifiable claims based on research findings.
ii. **Rigour:** in line with disciplinary best practice, using appropriate methods; adhering to agreed protocols where appropriate; note-taking and in drawing appropriate interpretations and conclusions from the research; and in communicating the results.
iii. **Transparency and open communication:** in declaring potential competing interests; in the full reporting of research methods; in the analysis and interpretation of data; in making research findings widely available, which includes publishing or otherwise

[4] Definitions are taken from the Concordat on Research Integrity available at: https://www.universitiesuk.ac.uk/sites/default/files/field/downloads/2021-08/Updated%20FINAL-the-concordat-to-support-research-integrity.pdf

sharing negative or null results to recognise their value as part of the research process; and in presenting the work to other researchers and to the public.

iv. **Care and respect:** for all participants in research, and for the subjects, users and beneficiaries of research, including humans, animals, the environment and cultural objects.

v. **Accountability:** of funders, employers and researchers to collectively create a research environment in which individuals and organisations are empowered and enabled to own the research process.

B. **Research:** defined as, 'a process of investigation leading to new insights, effectively shared... It includes work of direct relevance to the needs of commerce, industry, and to the public and voluntary sectors; scholarship; the invention and generation of ideas, images, performances, artefacts including design, where these lead to new or substantially improved insights; and the use of existing knowledge in experimental development to produce new or substantially improved materials, devices, products and processes, including design and construction'.

C. **Researchers:** are defined as individuals who conduct research (this includes for example research employees, independent contractors, consultants, research students, staff on joint clinical or honorary contracts, research staff visiting from other organisations).

D. **Employers of researchers:** are any bodies or organisations that conduct or host research; employ, support or host researchers; teach research students; or sponsor and/or support research.

E. **Funders of research:** can be public, third or private sector. Funders may also be employers of researchers, and they may also commission research, and/or provide block grants or hypothecated funds. The definition includes organisations that provide financial sponsorship for research and/or researchers.

F. **Other organisations:** a diverse range of other organisations are involved in supporting the integrity of research and may include professional, statutory and regulatory bodies; academies and learned societies; professional and subject-specific representative bodies; journals and publishers; third sectors (e.g. charities such as Cancer Research UK); and organisations offering advice, guidance and support, such as the UK Research Integrity Organisation (UKRIO).

These core elements of research integrity apply to all aspects of research carried out at Bangor University, including the preparation and submission of grant and project proposals, the publication and dissemination of findings, and the provision of expert review on the

proposals or publications of others (that is, peer review). Researchers have full autonomy in their academic choices but must also accept responsibility for the decisions that they make. Responsibility for acting in accordance with the principles of research integrity in all aspects of research work, including peer review, therefore lies with the individual.

4. Related Policies

The University's webpage (Governance Services) list current versions of policies that are relevant to research integrity. These will be reviewed and revised regularly as part of the University's report for the Concordat. The Research Integrity Policy does not apply to work routinely done as part of a course module or other coursework. This is covered by the Academic Integrity Procedure.

a) Research Ethics Policy

The Concordat requires that research is conducted according to appropriate ethical, legal and professional frameworks, obligations and standards. The Research Ethics Policy sets out the processes required to determine whether researchers need to obtain ethical approval for their research, and if so, how this is undertaken. The University Research Ethics Policy can be found on the Governance Services web pages[5].

b) Public Interest Disclosure (Whistleblowing)

This Policy provides avenues for members of the University to raise serious concerns, disclose information in circumstances which the individual believes shows malpractice (including breaches of research integrity), and receive feedback on any action taken without fear of adverse repercussions. The University Policy on Public Interest Disclosure (Whistleblowing)[6] can be found on the University web pages.

c) Policy on Declarations of Interest

Conflicts of interests are relevant to research misconduct when they are not properly disclosed or managed during a research project or during an investigation of research misconduct. A conflict of interest is defined as an action or situation, actual, potential or perceived, which could lead an individual to be influenced by considerations of personal gain or gain to immediate family or close associates. The gains can be financial or constitute other forms of benefit. The University and members of staff have complementary

[5] https://www.bangor.ac.uk/governance-and-compliance/governance.php.en
[6] https://www.bangor.ac.uk/governance-and-compliance/governance.php.en

responsibilities in relation to the conduct of high-quality research. The University Policy on Declarations of Interest[7] can be found on the University web pages.

5. The Five Commitments of the Concordat on Research Integrity

Bangor University policies to meet the commitments outline in the Concordat on Research Integrity are as follows:

a) **Commitment 1: Maintaining the highest standards of rigour and integrity in all aspects of research.**

i) Researchers are responsible for understanding the expected standards of rigour and integrity relevant to their research as well as always maintaining the highest standards of rigour and integrity in their work.

ii) Deans of College, Heads of School and Research Institute Directors are responsible for maintaining a research environment that develops good research practice and embeds a culture of research integrity as well as supporting researchers to understand and act according to expected standards, values and behaviours. This responsibility extends to supporting researchers in living up to the expectations of this research integrity policy, especially in challenging circumstances and demonstrating they have procedures in place to ensure research is conducted in accordance with standards of best practice. This includes systems to promote research integrity; and transparent, robust and fair processes to investigate alleged research misconduct.

iii) Where research is being conducted collaboratively, and particularly within interdisciplinary or international partnerships, researchers should ensure that there is clear agreement on, and articulation of, the standards and frameworks that will apply to the work. *The Montreal Statement on Research Integrity in Cross-Boundary Research Collaborations* (2013)[8], and *The European Code of Conduct for Research Integrity* (2017)[9] provide helpful advice on this requirement.

b) Commitment 2: Ensuring that research is conducted according to appropriate ethical, legal and professional frameworks, obligations and standards.

i) Researchers must comply with ethical, legal and professional frameworks, obligations and standards as required by statutory and regulatory authorities, and by employers, funders and other relevant stakeholders. Researchers must ensure that

[7] https://www.bangor.ac.uk/governance-and-compliance/governance.php.en
[8] https://wcrif.org/montreal-statement/file
[9] https://allea.org/code-of-conduct/

all of their research is subject to active and appropriate consideration of ethical issues.

ii) Deans of College, Heads of School and Research Institute Directors are responsible for local ethical review arrangements and ensuring clear policies on ethical review and approval are available to all researchers, in line with the requirements of the Research Ethics Policy. This includes ensuring all members of staff within their sphere of responsibility are aware of and understand policies and processes relating to ethical approval. In addition, Governance Services provides support systems and advice to help researchers adopt best practice in relation to ethical, legal and professional requirements and standards.

c) Commitment 3: 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.

i) Researchers must take responsibility for keeping their knowledge up to date on the frameworks, standards and obligations applying to their work as well as collaborate with the University in maintaining a research environment encouraging research integrity. Part of this involves designing, conducting and reporting research in ways that embed integrity and ethical practice throughout each School and College.

ii) The University will, under the terms of the Concordat, provide:

- Clear policies, practices and procedures to support researchers;
- Training on research ethics and research integrity. Including suitable learning, training and mentoring opportunities to support the development of researchers' skills throughout their careers;
- Robust management systems to ensure that policies relating to research, research integrity and researcher behaviour are implemented;
- Awareness among researchers of the standards and behaviours that are expected of them;
- Systems within the research environment that identify potential concerns at an early stage;
- Mechanisms for providing support to researchers in need of assistance;
- Policies in place that ensure that there is no stigma attached to researchers who find that they need assistance from their employers;
- Clear processes for any staff member to raise concerns about research integrity;
- An annual monitoring exercise to demonstrate the University has met its research integrity commitments under the Concordat;

- A named senior member of staff to oversee research integrity and ensure this information is kept up to date and publicly available on the University website. The individual undertaking this role is the Deputy Secretary / Head of Governance Services;
- A named member of staff who will act as a first point of contact for anyone wanting more information on matters of research integrity and ensure contact details for this person are kept up to date and are publicly available on the University website. The individual undertaking this role is the Senior Research Governance and Policy Officer within Governance Services.

d) Commitment 4: Using transparent, robust and fair processes to deal with allegations of research misconduct should they arise.

i) Academic autonomy is fundamental to the production of excellent research and responsibility for ensuring no misconduct occurs rests with individual researchers. Research misconduct is characterised as behaviours or actions that fall short of the standards of ethics, research and scholarship required to ensure the integrity of research is upheld. It can cause harm to people and the environment, wastes resources, undermines the research reputation and damages the credibility of research. It is important to note, however, that honest errors and differences in, for example, research methodology or interpretations do not constitute research misconduct.

ii) Research misconduct can take many forms, including:

- **Fabrication:** making up results, other outputs (for example, artefacts) or aspects of research, including documentation and participant consent, and presenting and/or recording them as if they were real.
- **Falsification:** inappropriately manipulating and/or selecting research processes, materials, equipment, data, imagery and/or consents.
- **Plagiarism:** presenting other people's ideas, intellectual property or work (written or otherwise) as your own without acknowledgement or permission.
- **Failure to meet legal, ethical and professional obligations**, for example:
    - not observing legal, ethical and other requirements for human research participants, animal subjects, or human organs or tissue used in research, or for the protection of the environment
    - breach of duty of care for humans involved in research whether deliberately, recklessly or by gross negligence, including failure to obtain appropriate informed consent
    - misuse of personal data, including inappropriate disclosures of the identity of research participants and other breaches of confidentiality

    - improper conduct in peer review of research proposals, results or manuscripts submitted for publication. This includes failure to disclose conflicts of interest; inadequate disclosure of clearly limited competence; misappropriation of the content of material; and breach of confidentiality or abuse of material provided in confidence for the purposes of peer review.
- **Misrepresentation of:**
    - data, including suppression of relevant results/data or knowingly, recklessly or by gross negligence presenting a flawed interpretation of data
    - involvement, including inappropriate claims to authorship or attribution of work and denial of authorship/attribution to persons who have made an appropriate contribution
    - interests, including failure to declare competing interests of researchers or funders of a study
    - qualifications, experience and/or credentials
    - publication history, through undisclosed duplication of publication, including undisclosed duplicate submission of manuscripts for publication.
- **Improper dealing with allegations of misconduct:** failing to address possible infringements, such as attempts to cover up misconduct and reprisals against whistle-blowers or failing to adhere appropriately to agreed procedures in the investigation of alleged research misconduct accepted as a condition of funding. Improper dealing with allegations of misconduct includes the inappropriate censoring of parties through the use of legal instruments, such as non-disclosure agreements.

iii) The University will investigate allegations of research misconduct when they arise. Any investigations into alleged research misconduct will include:

- Being mindful of minor infractions, including honest errors, particularly by less experienced researchers or where there is no evident intention to deceive. These examples may often be addressed informally through mentoring, training and guidance for the researcher.
- Taking reasonable steps to ensure the investigation is independent and avoids any potential conflicts of interest.
- Ensuring the investigation is well documented and occurs over a reasonable timeframe.
- Acting with no detriment to whistleblowers, who have made allegations of misconduct in good faith, or in the public interest, including taking reasonable steps to safeguard their reputation.

- Taking reasonable steps to safeguard the reputation of individuals who are exonerated.
- Providing relevant information on investigations of research misconduct to funders of research and to professional and/or statutory bodies as required by their conditions of grant and other legal, professional and statutory obligations.
- Supporting researchers in providing appropriate information when they are required to make reports to professional and/or statutory bodies.
- Providing a named point of contact or recognise an appropriate third party to act as confidential liaison for whistleblowers or any other person wishing to raise concerns about the integrity of research being conducted under their auspices. The individual undertaking this role is the Chief Operating Officer.

e) Commitment 5: Working together to strengthen the integrity of research and to reviewing progress regularly and openly.

i) The University is committed to the ongoing development of a culture that supports and nurtures research integrity, and of mechanisms that provide assurances and, when things go wrong, to ensuring appropriate investigation and action are forthcoming.

ii) As part of its commitment to the Concordat the University will produce a short annual statement, approved by Council, and subsequently made publicly available, through the University website. This annual statement will include:

- A summary of actions and activities that have been undertaken to support and strengthen understanding and the application of research integrity issues (for example postgraduate and researcher training, or process reviews).
- Annual statements of instances there were governance concerns that could be used to improve Bangor University's research governance arrangements.
- Assurance that the processes for dealing with allegations of misconduct are transparent, timely, robust and fair, and that they continue to be appropriate to the needs of the University.
- A high-level statement on any formal investigations of research misconduct undertaken, which will include data on the number of investigations. If no formal investigation has been undertaken, this will also be noted.
- What has been 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.
- Notification on how the institution creates and embeds a research environment in which all staff, researchers and students feel comfortable to report instances of misconduct.

To improve transparency, a link to the statement will be sent to the Universities UK Secretariat of the Signatories to the Concordat.

6. Process for Investigating Research Misconduct

a) Concerns about or allegation of research misconduct can be brought to the attention of the Senior Research Governance & Policy Officer[10]. In the first instance, the Officer will consider concerns or allegation on its merit, and if the situation requires, will instigate an investigation within 5 working days.

b) Information provided to the Senior Research Governance & Policy Officer should include:

- Name(s) of the Researcher(s) and their affiliation to the research in question.
- Project title and/or grant number of the relevant research (if known).
- Description of the alleged research misconduct, and when and where it occurred.
- Any supporting evidence/documentation.
- Any other relevant information.

c) The individual will also need to provide their name and contact details so they may be contacted if further information or evidence is required. All allegations received will be treated with strict confidentiality and in line with the data protection legislation.

d) Anonymous allegations will be considered at the discretion of the Senior Research Governance & Policy Officer, where necessary taking advice from Deputy Secretary / Head of Governance Services or the Associate Pro Vice-Chancellor for Research Governance, based on the seriousness and credibility of the concern raised, and the likelihood of obtaining confirmatory evidence.

e) All allegations of research misconduct will be investigated in a confidential manner. This means all those involved in an investigation under this process, including the individual making the complaint, the researcher(s), and any witnesses, cannot discuss, disclose, infer, or make any statements about the allegation to any third parties at any time, unless formally endorsed by the University or unless required to do so by law.

f) The names of the individual bringing the complaint, researchers, and other witnesses (and any information that might identify them) will be redacted before documents are circulated under any stage of the investigation process to any person other than the Investigating Officers (see below), appointed investigators or other relevant members of University staff as required by the alleged misconduct (e.g. immediate supervisor, College Manager). All personal

[10] Contact details on: https://www.bangor.ac.uk/governance-and-compliance/ethicsandresearchethics.php.en

information forming part of the disciplinary process will be kept in accordance with the General Data Protection Regulations and the Data Protection Act 2018.

g) It is important to note rules of confidentiality do not prevent the University from disclosing information about investigations and their outcomes where required in the fulfilment of duties, or as required by law or any contractual obligations owed to third parties. This may include informing the funding bodies (in line with their individual policies and procedures), collaborating organisations, or any other professional or regulatory authorities.

h) If necessary, the Senior Research Governance & Policy Officer will request and assess any further documents (e.g. files, notebooks, copies of emails or other records) and/or information from the Individual making the complaint, the Researcher, their immediate Supervisor, Research Institute Director, or other relevant individuals.

i) On conclusions of the preliminary review, the Senior Research Governance & Policy Officer will prepare a brief report for the Head of the School and the researcher(s) immediate supervisor(s) making a recommendation:

- The allegation is without substance and there is no case to answer.
- The allegation appears to be of a frivolous, malicious, or vexatious nature.
- The allegation stems from a dispute between two or more parties which can reasonably be resolved through reconciliation and agreement.
- Whilst the allegation may have some substance there is a clear lack of intent or deception, or due to its relatively minor nature, the infringement would be more appropriately addressed through education, coaching, supervision, or other non-disciplinary approach.
- The allegation is serious enough to merit a more formalised assessment by an Investigation Panel.

j) Where it is deemed an Investigation Panel ('the Panel') is warranted, the Senior Research Governance & Policy Officer will inform the Deputy Secretary / Head of Governance Services who will take the matter forward or appoint a nominee to do so.

7. Research Misconduct Investigation Panel

a) For transparency, the Panel will have at least one external member who is not affiliated to the University.

b) The Panel will be chaired by a Pro Vice-Chancellor or a Dean from a different College.

c) The Panel will have at least one expert in the area of research in which the alleged misconduct has taken place, who will ideally, not be a member of the same School or academic unit under investigation.

d) The function of the Panel will be to review all relevant evidence, and to establish whether, on the balance of probabilities, research misconduct was committed

(either intentionally or unintentionally), and the possible nature and extent of the misconduct.

e) The researcher(s) and the individual making the complaint(s) will be invited to attend the Panel and are entitled to representation from a friend, family member or trade union representative who can speak on their behalf.

f) To perform its task the Panel will:

- Review the allegation and all supporting evidence/documents provided by the Individual making the complaint about the Researcher(s).
- Assess any background information relevant to the allegation.
- Review the documents/evidence gathered during the Preliminary Investigation.
- Request and assess any further documents (e.g. files, notebooks, copies of emails or other records) and/or information from the Individual making the complaint, the Researcher(s) or other relevant individuals.
- Interview both the Individual making the complaint and the Researcher(s), and any other witnesses/individuals (including the Senior Research Governance & Policy Officer who conducted the preliminary investigation) who might provide relevant information.
- Where the case involves complex legal issues, seek appropriate advice from an internal or external lawyer, or other suitably qualified person.
- Determine and take any other actions as appropriate.

g) Within 5 working days, where practicably possible, of the completion of the proceedings of the Panel, the Deputy Secretary / Head of Governance Services or nominee shall give notice, in writing, to the researcher of the finding of the Board and the penalty (if any) imposed. The Deputy Secretary / Head of Governance Services shall at the same time advise the researcher of the right to appeal as specified in Section 8.

h) On conclusion of the investigation, the Panel will produce a report outlining how the inquiry was conducted, whether the allegation was upheld, its conclusions and the reasons for the Panel's findings(s). As part its report the Panel should also make recommendations regarding any further necessary actions that should be undertaken to address any misconduct it may have found. This may include for example:

- Withdrawing or correcting related article(s) in peer-reviewed journal(s).
- Appropriate education, coaching or supervision.
- Referring the matter to HR for possible disciplinary action.
- Reviewing the localised management, training or supervisory procedures for weaknesses that may have led to the misconduct.
- Informing appropriate individuals within the University or external organisations. This might include for example The relevant funding body, partner organisation or a regulatory/professional body.

8. Appeal Process

a) A researcher is entitled to appeal against a decision of the Investigation Panel to an Appeals Panel.

b) An appeal against the Investigation Panel must be submitted to the Deputy Secretary / Head of Governance Services within 10 working days, where practicably possible, of receiving the decision of the Investigation Panel.

c) The Appeal shall state if the appeal is against the finding or the penalty or both and shall give the grounds for the appeal.

d) Appeals will only be considered on the following grounds:

   i. Defects or irregularities in the conduct of the Panel and where such defects, irregularities or advice could have affected the decision.

   ii. Exceptional circumstances that relate to the Panel's decision. The appellant must explain why such personal circumstances were not made known to the Panel before its meeting. Where a researcher could have reported exceptional circumstances to the Panel prior to its meeting, but did not do so, those circumstances cannot subsequently be cited as grounds for appeal.

e) The Appeal Panel shall be appointed by the Deputy Secretary / Head of Governance Services. No person shall be appointed to both the Investigation Panel and the Appeal Panel.

f) The Appeal Panel will be chaired by a Pro Vice-Chancellor or a Dean from a different College.

g) The findings of the Appeal Panel are final.