

University of Cambridge Annual Integrity Report to Council 2019-2020

The mission of the University of Cambridge is to contribute to society through the pursuit of education, learning, and research at the highest international levels of excellence. The University recognises that the pursuit of excellent research and the fulfilment of our responsibilities to participants in research, research users and the wider community require the maintenance of the highest standards of integrity and ethics. As such the University supports and is committed to upholding the Universities UK *Concordat to Support Research Integrity*.

This statement has been made to the University's Council to demonstrate that measures are being taken to sustain and further enhance the integrity of the research undertaken at the University. It is in fulfilment of recommendations made by the *Concordat* for annual reporting on research integrity to the University's governing body and covers the academic year 2019-20. As recommended by the *Concordat* this statement will be made publically available online.

This annual report has been designed to be a stand-alone document that does not require readers to consult previous years' reports. New developments that have occurred during 2019-20 are addressed in part one, while structural aspects of the University's research integrity procedures and processes, as well as developments made in previous years that have continued to be important during 2019-20 are addressed in part two. Part three addresses the *Concordat* commitment to report on the handling of allegations of the research misconduct.

Part one: Supporting and Strengthening Research Integrity during 2019-20.

The University is committed to continually improving the way in which it works to sustain and enhance the integrity of research undertaken at the University. This has been of particular importance during 2019-20 due to the launch of the revised *Concordat to Support Research Integrity* in October 2019.

Following the launch of the revised *Concordat*, the University Research Office undertook a review to ensure the University's continued compliance and presented an action plan to the Research Policy Committee in January 2020. As a result of the action plan, the following steps have been taken:

- The University's Research Integrity Statement and Good Research Practice Guidelines were revised in March 2020 to take account of the new commitments and expectations of the revised *Concordat*.
- All research integrity training has been updated to take into account the same changes.
- The Research Office has collaborated with Cambridge University Press to develop an online research integrity course which will launch in 2020-21 – enabling a significant widening of the reach of research integrity training.
- Members have been recruited for the Research Integrity Advisory Panel to enable it to launch during 2020-21. This Panel will provide advice to students and staff on research integrity issues in a manner that allows expert advice to be provided quickly and without stigma.

- The University has begun a new process to enable lessons to be learnt from research misconduct cases. Investigatory committees are now encouraged, where appropriate, to make recommendations for changes to University policy and practice in light of the findings of their investigations. These findings will be reported to the Research Policy Committee on an annual basis, alongside an action plan for each. The first such report was received in June 2020.

In addition, the following steps from the action plan are underway.

- The Misconduct in Research policy has been revised and is due to be presented for consideration by the University's central committees in Michaelmas Term 2020.
- UUK and UKRIO are expected to issue new guidance for universities on assessing their own compliance with the Concordat, once these have been released the Research Office will develop an approach to regular review of research integrity practice and culture in the University.

A separate review, by the Advisory Working Group on Research Integrity, chaired by the Pro-Vice-Chancellor for Research, is reviewing University procedures for:

- a) the collection, curation, management and security arrangements for personal information obtained for research purposes at Cambridge;
- b) the effectiveness of the University's current policies and procedures with regards to management of personal data for research, including arrangements for anonymization of data and assurance that the processing of personal data is compliant with regulations and legislation including GDPR;
- c) the effectiveness of the University's current policies and procedures with regards to the management of conflicts of interest arising from work undertaken by University staff in a private capacity;
- d) the effectiveness of the University's current practices to ensure compliance with policies and procedures for research integrity, including current provisions for training and accreditation for academic staff, research staff, and postgraduate students.

The work of this group has been delayed due to the current pandemic and consequent delays to the launch of other policies (which this group intends to incorporate into its review), but its work will resume in 2020-21.

In addition, the University is currently preparing an Institutional Action Plan for Research Culture. This project is led by the University's Postdoc Academy and is primarily designed to address expectations of the Concordat to Support the Career Development of Researchers. The ambitions of the project to support an open, collaborative and transparent research culture and improve opportunities for professional development and training are closely aligned to the expectations of the Concordat. The Research Office will work closely with the Postdoc Academy to maximise the synergies between the Research Culture Action Plan and support for research integrity at Cambridge.

During 2019-20 the RGIO and RGF have been active participants in conferences and workshops organised by the Russell Group and LERU. The RGIO is also leading on the establishment of a Russell Group Export Control Forum.

Part two: The Governance of Research Integrity at the University of Cambridge

The University of Cambridge recognises that supporting and strengthening the understanding and application of research integrity issues requires clear senior leadership. To ensure that research integrity is governed at a high level within the University, the Pro-Vice-Chancellor for Research (PVC-R) was appointed as the senior academic lead on research integrity matters within the University in October 2013. The PVC-R is responsible for providing academic leadership on research integrity and acts as the first point of contact for anyone with comments, concerns or questions regarding research integrity at Cambridge, fulfilling a recommendation under Commitment 3 of the *Concordat*. The PVC-R may be contacted through the Research Strategy Office using the researchintegrity@admin.cam.ac.uk email address.

The PVC-R is supported by the University's Research Strategy Office (RSO). The RSO's responsibilities in this area are managed by a Research Governance and Integrity (RGI) Team consisting of the Research Governance and Integrity Officer (RGIO) and Research Governance Facilitator (RGF). The RGI Team supports the PVC-R, Head of the Research Office and University Research Ethics Committee (UREC) to oversee the University's research ethics and governance systems, foster a culture of research integrity across the institution and support the implementation of the University's *Misconduct in Research* policy. They are tasked with ensuring that actions are taken to embed the commitments of the *Concordat* into the University's research environment and ensuring that systems, practices and processes across the University are periodically reviewed so that they remain fit for purpose and reflect best practice in research integrity. The RGI Team also provide researchers and staff with a clear point of contact for advice, support and guidance on research integrity, research ethics, legal requirements, and professional obligations and standards. The Clinical School's Research Governance Team provides similar support and offers particular expertise on the NHS research ethics approval process. The UBSS and AWERB provide support and guidance on animal welfare issues.

Additional support and guidance on specific issues can be found throughout the central administrative offices, including the Research Office, University Biomedical Support Services, Safety Office, Human Resources, the Information Compliance Office, Office of Scholarly Communications, and the Legal Services Office."

The UREC has also been given responsibility to 'advise the Pro-Vice-Chancellor (Research) on the development and implementation of policies and procedures relating to research integrity', particularly in relation to Commitment 2 of the *Concordat*. All changes to research integrity policies and procedures are commented on by the UREC before decisions are made by the University's central committees. To facilitate a joined up approach to research governance, the PVC-R and the UREC receive reports on research integrity matters from the RSO.

The UREC has responsibility for the co-ordination of the continual development and dissemination of the University's research ethics policies (excluding animal research) and has oversight of local and School-level Research Ethics Committees (RECs). Ethical review is primarily provided by local and School-level RECs. The UREC provides review to projects that are beyond the expertise of School-level RECs and hears appeals against local and School level RECs. The University's RECs report annually to the UREC so that potential

concerns can be identified and addressed. The UREC undertakes continuous review and monitoring of the University's ethics system to ensure that it meets best practice standards and provides a streamlined and effective service for researchers. The UREC is also responsible for monitoring the implementation of the University's ethics policies, which is carried out primarily through their monitoring of local ethics committees and surveys of and consultations with departments. The UREC provides the University's RECs with regular advice and guidance. The UREC reports annually to the General Board.

The PVC-R is Chair of the RPC. The RPC receives minutes of the UREC and major issues or new policies relating to research integrity are referred to the RPC for consideration and approval. The RPC also refers research integrity matters to the General Board where necessary.

The University also has management procedures to ensure that consideration of the 3Rs (the Replacement, Refinement and Reduction of Animals in Research) are embedded into all aspects of our strategic operation management and a well-developed governance system for animal welfare. The [Animal Welfare and Ethical Review Body \(AWERB\)](#) has regular meetings with the University's three Named Veterinary Surgeons and Named Animal Care and Welfare Officers and actively/directly oversees the management of governance. University Policies developed by the AWERB are implemented in all research facilities.

In any work involving animals of protected species, the policy of the University of Cambridge is to adhere to high standards of humane care and treatment of those animals. Research and teaching activities at the University involving animals considered to be sentient are governed by a range of legislation, including the Animals (Scientific Procedures) Act, 1986 and, in the case of teaching to veterinary students, the Veterinary Surgeons Act 1966. Compliance of research involving these species is monitored by University staff, including the Named Veterinary Surgeons, and by the Home Office through its inspectors. All members of the University carrying out procedures regulated under the Act must by law have prior training, relevant experience, and authority from the Home Office. All projects affecting such animals are subject to prior formal ethical review within the University. Further details on animal welfare at the University are available here: <https://www.cam.ac.uk/research/research-at-cambridge/animal-research>

Heads of Department and Faculty are responsible for research integrity and ethics matters in their institution, including the implementation of the University's research ethics and integrity policies and procedures at a local level and taking initial responsibility for actions under the *Misconduct in Research* policy.

Policies and procedures for supporting research integrity

Under Commitments 2 and 3 of the *Concordat*, the University is required to have clear policies and procedures to support research integrity.

The University's commitment to upholding the principles of the Concordat is set out in its *Statement on Research Integrity*, which is publically available on the University's Research Integrity website. The Statement explains the ways in which the University will support researchers to maintain the highest standards of integrity in research and publically highlights the role of the PVC-R as first point of contact for anyone with comments, concerns or questions regarding research integrity at Cambridge.

The *Statement on Research Integrity* has been designed to complement existing University policies and guidelines for supporting the highest standards in research. The University's *Guidelines on Good Research Practice* sets out principles of good conduct that all those engaged in research at the University are expected to follow. They cover a range of issues including openness, supervision, training, intellectual property, the use of data and equipment, the publication of research results, and ethical practice. The *Guidelines* provide a more comprehensive introduction to good research practice at Cambridge than the *Statement on Research Integrity* and highlight links to further guidance on key issues.

The Guidelines have also been developed into a *Research Integrity and Good Research Practice Checklist*, which is designed to help supervisors to provide research students with an introduction to issues of research integrity and encourage broader dialogue about good research practice. The *Checklist* is available as a [webpage](#) and downloadable document.

The University's approach to the governance of the ethics of research and the ethical review process are set out in the *Policy on the Ethics of Research involving Human Participants and Personal Data*. This policy provides guidance on the University's expectations of ethical practice in research, setting out guiding principles by which all research activities undertaken by University employees, or on University premises, must abide. It also offers clear guidance for those seeking and those undertaking ethical review of a project and the governance arrangements for the University's ethical review process. Heads of Department and Chairmen of Faculty Boards are responsible for implementing the policy at a local level and individual researchers and supervisors of research students are expected to familiarise themselves with their responsibilities.

The University also recognises that its position globally as a centre of research excellence comes with the associated responsibility of ensuring that all research with animals is undertaken with a priority in achieving the highest welfare standards. This underpins the *University Animal Welfare Policy*.

The policies listed above, together with other policies relevant to research integrity, are freely available online. As required by the Concordat, the University's policies are subject to periodic review to ensure that they remain 'fit for purpose'. Up to date links to these policies will be published as part of each Annual Research Integrity Report:

- Statement on Research Integrity: <http://www.research-integrity.admin.cam.ac.uk/research-integrity/research-integrity-statement>
- Guidelines on Good Research Practice: <http://www.research-integrity.admin.cam.ac.uk/research-integrity/good-research-practice>
- Policy on the Ethics of Research involving Human Participants and Personal Data: <https://www.research-integrity.admin.cam.ac.uk/research-ethics>
- Animal welfare policies: <https://www.cam.ac.uk/research/research-at-cambridge/animal-research>
- University Financial Regulations: <http://www.admin.cam.ac.uk/offices/finance/regulations/>
- 'Whistleblowing' Policy: <http://www.admin.cam.ac.uk/offices/hr/policy/whistleblowing.html>
- Policy Against Bribery and Corruption:

<https://www.governanceandcompliance.admin.cam.ac.uk/governance-and-strategy/policy-against-bribery-and-corruption>

- Children and Vulnerable Adults Safeguarding Policy:
<http://www.hr.admin.cam.ac.uk/policies-procedures/children-and-vulnerable-adults-safeguarding-policy>
- Research Data Management Policy Framework:
<https://www.data.cam.ac.uk/university-policy>

Advice and guidance

Expert support and guidance on research integrity is offered throughout the University. Centrally the RGIO, RGF and the Clinical School's Research Governance Team support researchers to understand and meet to expected standards of research ethics and integrity, as well as legal, professional, regulatory and funder obligations. Additional support and guidance on specific issues can be found throughout the central administrative offices, including the Research Office, University Biomedical Support Services, Safety Office, Human Resources, Information Compliance Office, Office of Scholarly Communications, and the Legal Office. Department and Faculty research ethics committees provide an additional source of support for researchers. Guidance can also be sought from School-level research ethics committees and the UREC.

The dissemination of research ethics and integrity policies and procedures has been identified as a key focus for strengthening the understanding and application of research integrity issues at Cambridge. Central to the University's awareness raising efforts is the maintenance of the [University research integrity website](#). The website provides guidance on research ethics and research integrity, including the University's ethical review process for research. The site also provides links to the University *Misconduct in Research* policy and information on research ethics and research integrity training.

The University's *Statement on Research Integrity* has also been developed as a means of building awareness of research integrity. The *Statement* has been designed to act as a brief introduction to research integrity for new staff at Cambridge. It sets out the standards by which the University expects all its researchers, research students and visiting researchers to abide and provides links to other University policies that relate to research integrity. The *Statement* has been made into a leaflet, which is [available online](#) so that it can be integrated into departmental and faculty training and induction. The leaflet is provided by the RGIO and RGF at central inductions for new postdoctoral staff and as part of centrally run training.

The research integrity website is also designed to act as a hub for anyone seeking information and guidance on research integrity issues at Cambridge; as such it provides links to guidance offered by Schools, departments, local research ethics committees and relevant administrative offices. Of particular importance is the University's guidance on animal welfare issues, which is provided on the [University's Animal Research webpages](#) and by the [University Biomedical Support Services \(UBSS\)](#). Online guidance on clinical research governance is provided on the [Clinical School website](#)

Good data management practice is crucial for both the verification of research findings and to maintain the integrity of the research. In addition, [funders require](#) that research data is properly managed during the research lifecycle and is made available at the end of research

project/at time of publication. One of the key roles of the Research Data Management (RDM) Facility at the University of Cambridge is to create support services for research data management and sharing at Cambridge.

To achieve this, the RDM Facility provides researchers with seven core services: online information, advocacy and outreach, training, consultancy on data management, policy development and discussions with funders, data management plan support and data repository.

The RDM Facility work with Faculties and Departments to provided tailored RDM support through a variety of initiatives, including data management planning pilot schemes for PhD students, dedicated training and the Data Champion Programme. The Data Champions Programme is a network of volunteers from the University who promote good RDM practices in their local departments and membership to it has doubled in the last year. There are now 86 Champions spread across a number of Departments in the University. In addition the Facility engages in external engagement by running a Twitter feed ([@CamOpenData](#)) with almost 2000 followers and sends out a [regular newsletter](#) to almost 2200 recipients. The success in our work in encouraging researchers to share their data to make their work more transparent and reproducible is evident in the use of the University repository, Apollo. It contains the largest number of research datasets of any UK higher education institution and in 2018, datasets were downloaded over 39,000 times from the repository by users from across the globe.

The research community benefits from good research data management practice in terms of efficiency within their own research programmes, increased recognition for data that is shared through the ability to cite data that has a DOI allocated to it, and the ability to use other datasets made available. The University benefits from being recognised as a world leader in the development of research data management practices. The community benefits through a more cost effective use of research funds because work does not need to be duplicated.

Training, mentoring and events

Training has also been identified as a priority for the University's work to support research integrity. Face-to-face research integrity training has been available centrally since 2014 (x2 sessions per term). The course is open to all research staff and research students and aims to familiarise attendees with the University's policies and procedures for research integrity, ethics and misconduct. The course also uses case studies and discussion to explore key research integrity issues.

The RGIO, with support from the RGF, also offers bespoke training for departments, faculties and Schools where this is requested. During 2019-20, the following training was provided:

- Research integrity training for PhD students in the School of Clinical Medicine, Department of Chemistry, Wellcome Trust Developmental Mechanisms and Department of Physiology, Development and Neuroscience, CRUK Cambridge Centre, Stem Cell Institute, Sainsbury Laboratory and Department of Pathology;
- Research integrity training for postdoctoral researchers delivered through the University's Office for Postdoctoral Affairs;

- Research integrity training for PIs at the School of Clinical Medicine;
- Introductory integrity training for new PIs in other Schools as part of the Research Office's PI development Programme;
- Research integrity training for administrators that was delivered as part of the Research Office's Training course for departmental administrators;
- Responsible Research and Innovation Training for PhD students on the EPSRC CDT.

In addition, the RGIO is one of the speakers on the University's Pathways to Higher Education Practice course for newly appointed probationary lecturers.

Centrally the University also provides online or face-to-face training in areas such as good research practice, working with human subjects, data protection and health and safety. Training is provided by the University Biomedical Support Services for those seeking Home Office Licences. Externally provided online training is promoted through the research integrity website and the Clinical School's Research Governance website.

Since 2015 departments and faculties have been expected to integrate the *Concordat* and all relevant University statements and policies, including the *Misconduct in Research* policy, into faculty or department inductions for new academic staff and PhD students. In addition to this, many of the University's departments and Schools offer subject-specific training in research integrity issues. The approach taken to this varies locally: it includes training that has been integrated into Departmental research skills courses; stand-alone lectures or workshops; School-level support, such as research ethics training offered by the Social Sciences' Research Methods Centre; and courses arranged with external providers.

Induction events for postdoctoral staff are run by the University's Postdoc Academy. The RGIO or RGF attends all such inductions to provide a brief introduction to research integrity and research ethics and to answer questions from attendees.

Mentoring plays a key role in building awareness and understanding of policies and procedures at Cambridge. The University formally requires that all its institutions make arrangements for the mentoring of newly appointed staff and runs schemes for peer and developmental mentoring.

The University is committed to the continuing and ongoing improvement of its processes for supporting and strengthening the understanding of research integrity at Cambridge and future efforts will be reported on in subsequent annual reports.

Part Three: Addressing research misconduct

As required under Commitment 4 of the *Concordat*, the University has a *Misconduct in Research* policy and procedure that sets out a transparent, robust, confidential and fair process for dealing with allegations of research misconduct. The policy provides a clear definition of research misconduct and the responsibility of members to report incidents of misconduct, whether these have been witnessed or are suspected.

The investigation procedure sets out a thorough process through which allegations are investigated by individuals with appropriate authority, qualifications and experience and no conflict of interest in the case. The procedure is clearly linked to disciplinary procedures

contained within the University's Statutes and Ordinances to ensure that appropriate action can be taken when concerns are upheld. The procedure also ensures that allegations are investigated in an appropriately confidential manner.

The University is committed to ensuring that it meets all obligations to provide information on investigations of research misconduct to funders of research and professional and/or statutory bodies as required by conditions of grant and other legal, professional and statutory obligations, and will support researchers to do the same.

The *Misconduct in Research* policy, including details of the relevant contacts and procedures, is available on the [University HR website](#). It is also highlighted on the [University research integrity website](#), as part of research integrity training, within the *Good Research Practice Guidelines* and accompanying checklist, and in the research integrity leaflet.

A research misconduct guidance card is provided to new Heads of Departments to assist with the preliminary steps involved in managing a misconduct allegation. The resource is intended to be used in conjunction with the [Misconduct in Research policy](#) and provides increased support at the earlier stages of the process.

Individuals seeking advice on the University's misconduct procedure are able to contact the PVC-R, the Academic Secretary, the RGIO, their Head of Institution and/or the relevant HR Advisor for the institution concerned.

The policy is appropriate to the needs of the University. To ensure that this continues to be the case, the policy is currently under review.

The University recognises that it can be difficult for staff and students to report instances of research misconduct. The University's long-standing Whistleblowing policy is designed to provide protections for those raising such concerns. In addition, the Research Governance and Integrity Officer offers confidential advice for those considering raising concerns. The University has also now recruited the first tranche of members, drawn from the University's academic community, for its new Research Integrity Advisory Panel. The Panel members will be trained during the 2020-21. Once this has occurred they will also be able to provide confidential (in this case discipline specific) advice for those with questions regarding research integrity or considering raising concerns.

The University's *Misconduct in Research* policy sets out a three stage process for the handling of allegations. All allegations are subject to an initial review by the relevant Head of Institution to decide whether they should be investigated under the policy. All allegations judged to require investigation under the policy are initially considered through a preliminary investigation and will progress to a formal investigation if a *prima facie* case that requires further investigation is identified at the preliminary stage. The *Concordat* requires that the University provide a high-level report on any formal investigations of research misconduct that have been undertaken during each academic year and to include it in this public statement. In the interests of transparency, the University has decided to also report on any preliminary investigations of research misconduct undertaken. The table below provides this report for the 2019-20 academic year.

Table 1: Investigations carried out under the University of Cambridge Misconduct in Research policy, 2019-20.

Type of allegation	Stage reached	Investigation result
Deception/Self-plagiarism	Preliminary Investigation	Not upheld (Reported as ongoing in 2018-19 report)
Plagiarism	Preliminary Investigation	Ongoing
Falsification	Preliminary Investigation	Not upheld
Plagiarism	Preliminary Investigation	Not upheld
Authorship infraction / deviation from accepted practice	Preliminary Investigation	Not upheld
Plagiarism and fabrication	Preliminary Investigation	Ongoing
Fabrication	Preliminary Investigation	Ongoing
Plagiarism	Preliminary Investigation	Ongoing

In 2019-20 the Research Office began a process of annual reports to the Research Policy Committee on lessons that have been learnt from research misconduct investigations that also makes recommendations for actions to be taken to address the issues identified. The following lessons and recommendations were included in the 2019-20 report:

- It was noted following one investigation that it can be challenging for research leaders who run longstanding studies to ensure that the highest standards of ethics are maintained in the context of ever-changing standards and practices. To address this it was recommended that the University should explore the possibility of developing a course or seminar to explore the particular challenges faced by those long-term studies and encourage best-practice sharing between those running such projects.
- The investigatory committee for another investigation recommended that the University should review whether current data management training for research students and staff sufficiently addressed good management and curation of image data.

In both cases, the Research Office has agreed to implement these recommendations during 2020-21.

External engagement

The *Concordat* recognises that a key part of successfully supporting a culture of research integrity in universities is for institutions to learn from each other and disseminate good practice. The sector has responded to this impetus and Cambridge has actively engaged with the resulting collaboration and sharing of good practice.

The University is a subscriber to the UK Research Integrity Office (UKRIO). UKRIO is an independent charity, funded by subscriptions, that seeks to support researchers and research organisations in relation to matters of research integrity, research ethics and research misconduct. Joining UKRIO has given the University access to additional training assistance from UKRIO, UKRIO guidance documents and assistance, a register of UKRIO advisors for misconduct investigations, and assistance in developing and enhancing our guidelines, procedures and training. In addition, by subscribing, the University is supporting the UKRIO's advice service, which is available to anyone in need of assistance of advice

with issues relating to research integrity. The University's membership of UKRIO is advertised on the [research integrity website](#).

The RGIO and RGF are also members of the Russell Group's Research Integrity Forum, which has been established to ensure that good practice is shared and to support shared efforts to foster a research environment that nurtures research integrity. The importance of this group as a space for open discussion and shared learning was highlighted by UUK in their 2016 review of the Concordat.¹ Through involvement in this group, the RGIO has also taken a leading role in Russell Group involvement in the UUK Research Integrity Forum. The RGIO is also a member of the League of European Research University's Research Integrity Thematic Group.

In 2018, the Russell Group Research Integrity Forum produced a [Statement of Cooperation](#) in respect of cross-institutional research misconduct allegations, which sets out principle for the management and review of allegations of research misconduct that involve more than one institution. The University has posted this Statement, to which the RGIO was a contributor, on the [Research Integrity website](#).

¹ Universities UK, 'The Concordat to Support Research Integrity: A Progress Report' (November, 2016), p. 26. Available at: <http://www.universitiesuk.ac.uk/policy-and-analysis/reports/Documents/2016/concordat-research-integrity-progress-report.pdf> [Accessed 18.09.17]