UNIVERSITY OF
LEADING
THE WAY
WESTMINSTER⌗

Approved Research Integrity Annual Narrative Statement, February 2022

1. Introduction: 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:

The University is committed to developing, enhancing and sustaining research good practice as part of its research culture and environment, through research that is of the highest quality and ethical standards. The University has been a member of the UK Research Integrity Office (UKRIO) since 2014 and has actively supported research integrity, as an employer of researchers, to fulfil its responsibilities as expected and required, by the signatories of the _Concordat to Support Research Integrity_ (2012 and 2019), and others we collaborate with. The University continues to contribute to the London Research Integrity Consortium (LRIC).

This Annual Narrative Statement outlines some of the work we have been doing this past year to continue to enhance the culture and environment in which research at the University thrives, in particular with regard to robust policies, processes, systems, and guidance, which work towards strengthening our support for researchers and facilitating their research, to ensure it meets the highest standards. We provide researchers training and mentoring, to develop these standards further.

2. Summary of activity to support research integrity in the period February 2021-February 2022:

In summary, in the last year, we have carried out work in the area of research and knowledge exchange (KE) ethics governance, training and development, and research governance, research data management, open access as well as further work around open research.

We have further strengthened the role of University Research Ethics Committee (REC) through the research and knowledge exchange related Committees restructure, approved by the University's Academic Council. The UREC reports directly to the most senior research and KE related body; the Research and Knowledge Exchange Steering Committee. The REC is now also formally responsible for ethical review of all research, which includes Knowledge Exchange activity, and therefore becomes known as the University Research and Knowledge Exchange Ethics Committee (continuing to be referred to as UREC). This more accurately reflects the University's portfolio as a centre for high quality research and KE activity.

A new _Policy for Security Sensitive Research and Knowledge Exchange Activity_ created by the Research Committee has recently been Approved by the Research and Knowledge Exchange Steering Committee. This includes specific guidance to researchers around questions they may need to answer when recording and submitting this work for review to the UREC. The Policy is in line with the UUK _Oversight of Security Sensitive Research Material in UK universities guidance_ (2019 update). Security Sensitive research is already well embedded within the University's research ethics framework, and the new Policy will further help researchers understand their obligations and highlight the University's support for them in carrying out such research and KE activity safely by protecting them from suspicion of potentially illegal activity by the authorities as far as possible whilst enabling important legitimate research. The University is developing a Standard Operating Procedure (SOP) for Security Sensitive Research for use by researchers and those managing or reviewing the research and KE activity.

The University continues its commitment to _Support the Career Development of Researchers_ through a number of new and ongoing initiatives, in particular the launch of a Researcher Development Hub.

UNIVERSITY OF
LEADING
THE WAY
WESTMINSTER

Researchers continue to be supported in recognising and carrying out research good practice, across the research lifecycle, by the Research and Knowledge Exchange Office (RKEO) which is further embedded in the University's infrastructure as a newly expanded team to support high quality research and KE activity. Researchers continue to receive regular updates through a number of channels, including the monthly RKEO Newsletter, which highlights internal and external developments in all areas of research and KE, including research and KE ethics, integrity and governance.

Please see a selection of highlights below, highlighting our work around supporting research integrity at the University in the past year:

- The University built on its benchmarking exercise of existing research ethics review and support guidance and procedures using the *UKRIO/ARMA Guidance for Research Ethics Support and Review in Research Organisations document*. This has resulted in a significant Research and KE Ethics Work-plan which is a long-term plan for the next couple of years, around enhancing our existing provisions around the governance of research and KE ethics, as well as the training and development needs, including communication and dissemination plans, to ensure information around internal and external best practice and requirements, reaches researchers at all levels, across all disciplines. Work around continuous improvement in ethics governance has commenced and significant progress made, such as the new composition of RECs, the ad hoc pool of ethics reviewers, and the completion of enhancements to the VRE in light of the *University's Code of Practice Governing the Ethical Conduct of Research* published the previous year. Further information on the Work-plan can be found at Section 8 below.

- The University remains fully compliant with the HTA's standards and responsibilities for holding and maintaining a research licence, in all four of the HTA's standards groups: 'standards of consent'; 'governance and quality systems standards'; 'traceability standards'; and, 'premises, equipment and facilities standards'. This work continues to be managed by the Human Tissue Authority Steering Group (reporting to UREC).

- New enhancements to the Virtual Research Environment (VRE) system for use by researchers and those managing research, include automated identification of risk related to face to face participant interactions, in light of the Coronavirus pandemic, in particular for off-site fieldwork (both UK and overseas). This ensures that researchers understand that such work will be automatically filtered to a REC for review even if otherwise seemingly low-risk. Thereby ensuring that due diligence can be carried out in how the proposed work can be undertaken safely in the rapidly evolving pandemic environment globally, where local guidance allows.

- Following significant revisions and enhancements made to the VRE system in the previous year to allow more oversight by UREC via monitoring, reporting and auditing tools, a UREC Audit Plan has been drawn up, Approved by Research Committee and implemented. The Audit Plan includes five phases, benchmarked against standards in both the *UKRIO/ARMA Guidance for Research Ethics Support and Review in Research Organisations document* and the *University's Code of Practice Governing the Ethical Conduct of Research*, and also specifically looking at the relevant funder or external organisation requirements e.g. *Concordat to Support Research Integrity, UUK*.   The first phase around College REC service delivery levels has commenced.

- With closer working of pre and post awards support and research ethics and integrity officer, all of whom are now based in the RKEO, there has been a steady increase in the quality of proposals submitted for funding and research ethics review. The pre-award

process has further embedded early consideration of research ethics and research good practice issues. Work by the RKEO to implement the new procedure around material transfer agreements further ensures standards of best practice continue to be reached by researchers and those managing the research.

- The University launched a [Researcher Development Hub](#) whereby researchers could register and access live training and development sessions as well as self-service themselves for training and development purposes through a series of videos and blog posts created by the RKEO providing information, briefings, updates and training and development around issues across the entire research life cycle, and including [research data management](#), [research ethics, integrity and governance](#), [open access](#), and [open research](#).

- As per the previous year, the University marked [Open Access Week 2021](#) with a series of blog posts and digital resources highlighting the tools, support, and infrastructure available at Westminster to support Open Research beyond open access to scholarly publications (including guidance on licensing research data for re-use to facilitate the reproducibility and increased transparency and robustness of research).

- UREC tested an online research ethics training module and work is underway to customise this for the University's research community needs, with the aim to pilot an online research ethics training programme, open for use by all researchers, including doctoral research students.

- Ongoing work to embed Research Data Management (RDM) within University research and KE ethics review processes and support. The value of this work was demonstrated when the RDMO recently attended a UK wide seminar on open research: the FAIRsFAIR National Roadshow event on 26 November 2021 (FAIRsFAIR is an EC-funded project to improve/set standards in RDM) and learned that the University is now ahead of the majority of UK higher education institutions in terms of the integration of RDM and research ethics.

- The RKEO has worked further around Persistent identifiers (PIDs) which aim to be a unique long-lasting reference to digital objects of various types, and are a core element of open research. In October 2021 we improved the ORCID functionality in the VRE, so researchers can not only attach their ORCID ID to their profile in the VRE, but also push data to, or receive data from, their central ORCID account. We have increasingly used our DataCite subscription to create DOIs for research outputs that are published by the University e.g. reports, doctoral theses and portfolios. DOIs make sure that each published article gets a unique, permanent identifier and can be cited easily and can increase visibility.

- Our enhanced portfolio development work in the VRE, building on the previous work on non-text based research outputs, has been designed to allow practice based researchers in any field to better showcase the outcomes of their research. These areas of research have been poorly served by the traditional publishing models that have existed up to this point.

- The RKEO has worked around improvement to Digital visibility – working with internal collaborators to create a dashboard with research and knowledge exchange income data to facilitate a high standard of research evaluation and management.

- The University's early/mid-career researcher representatives carried out a survey of their constituency's needs in March and published a report in May detailing actionable suggestions as to how they might better engage the community in high level conversations

regarding growth of research and KE culture. Their work started with building a practice and insight sharing Network, which is now 100+ strong, and is looking to hold termly meetings around emerging themes, including personal and professional development and equality, diversity and inclusion.

- Research Committee's Readers' and Professors' elected representatives held a workshop seeking to facilitate constructive conversation around our institutional Research and KE Strategy and the profile of Research and KE at the University. Attended by 39 colleagues from across the University, including senior leadership, the session explored understandings of good research culture and elucidated how an engaged Readers and Professors community might usefully contribute to high level strategy making, with discussions ranging from impact, ethics and PhD pipelines, to mentoring and research integrity. Thoughts gathered during the session are actively informing the work of the Readers' and Professors' representatives going forward as they seek to support the growth of our research and KE environment.

- To support promising researchers in the early stages of their careers, the University this year launched the Westminster Researcher Development Awards, a small amount of funding for 15 academics to put towards supporting their progression and development. Awardees benefit from termly meetings of the cohort and are supported to work regularly with a mentor. They are also supported to engage effectively with the Researcher Development Hub and our suite of research and KE development workshops (workshops range from data management training to collaboration with business and ethics and integrity) where appropriate.

3. Policies and Procedures including processes for dealing with allegations of research misconduct

The University has an externally published *Procedure for Managing Allegations of Research Misconduct*. The last revision made was in order to provide different procedures for staff and students:

Procedure for Managing Allegations of Research Misconduct **(staff), Approved, Academic Council, 2017.**

Research Misconduct Regulations **(students) Approved, Academic Council, 2017.**

The University will revise the procedures taking into account the expansion of definitions of research misconduct and expansion of responsibilities of all involved within research, as published in the UUK Concordat, and will do so in light of further guidance from UKRIO, in particular; *UKRIO's draft Misconduct Investigation Procedure* (anticipated by subscriber members for consultation, at time of the publication of this Statement). The UKRIO guidance was delayed the previous year, and is anticipated to be released to UKRIO members early in 2022.

The University has robust policies and procedures in place relating to research integrity and research ethics. The key documents for use are the University's *Code of Research Good Practice* (September 2020*) Code of Practice Governing the Ethical Conduct of Research* (September 2020).

The *Code of Research Good Practice* reflects updates in the newly published *Concordat to Support Research Integrity* including updates to responsibilities of all involved in the research. The updates also include further detailed reference to related University Policies, such as *Open Access* and *Research Data Management*, along with articulation of training requirements for researchers around the HTA's requirements.

An updated *Intellectual Property Policy* was approved by Academic Council in January 2020 and is also published, and currently undergoing internal review and revision. The University published a *Knowledge Exchange Strategy* which was approved by Academic Council in April 2020 and also published internally.

The University's *Research Data Management Policy* in relation to the *RCUK Common Principles on Data* and the *Concordat on Open Research Data* is publicly available.

The University's Visiting Researcher Policy is also undergoing review and revision this year.

The University's *Strategy for Research Development and Support* (also known as the Research Strategy) highlights the importance of research integrity and ethics and its research misconduct procedures.

It is recommended that significant review of all research policies and codes occur every three years, or earlier if there is a need to reflect internal or external changes.

4. University Research Governance public website and named contact details for receiving allegations of suspected research misconduct

The University's public facing Research Governance website includes a framework of research related policies and codes, including:

- the Named Persons contact details for receiving allegations of suspected research misconduct;
- point of contact for research governance related policies and codes (including research integrity);
- point of contact for procedural enquiries around both the staff and student research misconduct procedures;
- *staff and student procedures for managing allegations of research misconduct*;
- a direct link to the *University's Public Interest Disclosure Policy (Whistle-blower Policy)*;
- This Statement and its earlier iterations.

The operation of the *Misconduct Procedure* is overseen by the Pro Vice Chancellor Research (Professor Andrew Linn) or the Pro Vice Chancellor Knowledge Exchange (Professor Janet Jones) who will act as the "Named Person" under the Procedure. In the absence of the Named Person an Alternate will be nominated.

The information on this public website works towards ensuring an environment where researchers, others involved in research, and members of the public are aware how to report any allegations of suspected research misconduct and can feel comfortable doing so. Doctoral Researchers receive information around the process for reporting suspected research misconduct as per the website above, during the DRDP Workshop: the 'Ethical Researcher'. In addition, the Doctoral Researchers are also advised regarding the use of an intermediary in the form of the Graduate School Director, their Supervisor, the RKEO, College Doctoral Co-ordinator, if appropriate, in order to support them in making a potential allegation, if they do not feel comfortable approaching the Named Persons (PVCs). Those accessing or managing HTA records are pointed to the research misconduct procedures, named contact details and the whistle-blowing policy via the SOP for HTA Records Management.

UNIVERSITY OF
LEADING
THE WAY
WESTMINSTER⊞

5. Dissemination of policies to researchers

The policies are disseminated to staff via email-lists, REKO Newsletter, University news items, intranet, research governance website, and through formal Committee channels from University through to College Research Committees. The College Research Committees' terms of reference specifically include reference to dissemination of good practice, and the Committees are required to: *"uphold good research practice and governance and identify and disseminate good practice and innovation in research activity"* as well as *"foster internally, and represent externally, a vibrant research culture".*

The University HTA Steering Group (reporting to UREC) has provided a central point of online information and guidance (internal Blackboard Ultra site) for all researchers working under the HTA Licence. Update briefings are held for staff regarding new University systems or processes for ethical and compliant research.

During the current pandemic period, the UREC disseminated a number of updates via newsletters, email listings, and its own website, to all researchers with its Coronavirus Response updates for research. UREC continues to provide updates in the rapidly changing situation of researching during a pandemic and works in liaison with the University's Being Safe Feeling Safe Group (set-up for COVID-19 safe working purposes), to ensure researchers are aware how to conduct research safely, whilst actively identifying, assessing and mitigating risks for themselves and others, including through completion of appropriate risk assessments and by following the University's temporary research ethics policies, until advised otherwise by the University. The University points researchers to the RKEO blog post detailing UKRIO's checklist for researchers researching during a pandemic https://blog.westminster.ac.uk/researchoffice/ukrios-new-recommended-checklist-for-researchers/ .

The Graduate School's (GS) DRDP includes the 'Ethical Researcher Workshop' held in the first semester of studies for all doctoral researchers; the session is facilitated with expertise from the REIO and a CREC Chair with the GS Director and covers interactive case study-based sessions on research integrity; research ethics and principles; attribution and co-authorship; and, research misconduct. UKRIO and other professional body case studies are used, as well as guidance from Committee on Publication Ethics (COPE).

The GS ensures all doctoral researchers are kept up to date with latest sector and university wide polices and processes, and how this impacts their research projects directly, through a weekly GS Update via email (and with more specific updates where required). In addition, School Doctoral Co-ordinators and Directors of Studies check in with their doctoral students every week.

The RKEO has dedicated blog posts in the area of 'Research Governance, Integrity and Ethics' which is being developed further, where new research codes and external updates can be provided. A series of videos around managing and creating a research ethics application in the University's VRE system were created to help all researchers carry out ethical review (https://youtu.be/MXB2g8_rkXw) or self-assessment (https://youtu.be/DnN_PnE4DmU). The most recent video in this area was around the importance of considering research ethics, including through the entire research and KE activity life cycle: https://youtu.be/V2uVT-Ih7Sg .

The RKEO blog also provides updates throughout Open Access (OA) week to raise awareness of open research (in line with the *Concordat on Open Research Data* and *UKRI's open research policies, practices and procedures)*, supporting the dissemination, verification, reproducibility, and re-usability of research. OA Week provided an opportunity to highlight the new support and infrastructure available at the University for researchers to achieve openness.

6. Research Misconduct Investigations relating to researchers

AY 2020/21			
	School and College	Stage of Investigation e.g. preliminary, formal etc.	Upheld?
Researcher (staff)	0	0	0
Doctoral Researcher (student)	0	0	0

The University has not held any investigations of research misconduct during this period involving researchers (staff) or doctoral researchers (students).

7. University arrangements for Ethical Review

The University is guided by the fundamental principle that research involving humans and/or animals, and/or the environment should involve no more than minimal risk of harm to physical or psychological wellbeing, including working ethically for all types of research as outlined in the _Concordat (2019)._

The University is concerned to protect the rights, dignity, health, safety and privacy of research participants, the welfare of animals and the integrity of the environment. The University is also concerned to protect the health, safety, rights and academic freedom of researchers and the reputation of the University as a centre for properly conducted, high quality research.

The University is committed to the Concordat to support research integrity and facilitates a research ethics process to ensure that its research is conducted according to appropriate ethical considerations, while also following standards of professional practice and wider legal obligations. Singly and together these principles provide safeguards for researchers, participants and others working on the research.

Research projects should be considered for ethical self-assessment, and REC review if appropriate, before commencement of research work with potential ethical implications, and during the planning phases. Where there are requirements of research ethics review, these are carried out by the CRECs (in most cases). The highest risk or reputational risk work is reviewed by UREC, as well as security sensitive research.

For externally funded projects the Principal Investigator (PI) is supported prior to application for funding via the Research Development and Post-Award Team (RKEO) who work closely with the REIO to support the PI in addressing ethical issues which may arise. Following award, the PI and RKEO ensure the terms and conditions of the grant awarding body are met, including research ethics and integrity. The proposal must be provided to the University or College Research Ethics Committee for review in line with the University's _Code of Practice Governing the Ethical Conduct of Research_. PIs are required to report any changes to protocol as an 'amendment' within the VRE, for consideration and review and must await approval prior to undertaking any further work. The University will use its own codes, policies and guidance in research ethics as well as those of the

UNIVERSITY OF
LEADING
THE WAY
WESTMINSTER#

relevant external bodies to support the research. The PI must ensure the proposed work is of the highest standards and is responsible for being aware of, and following, their own professional requirements as well as requirements of the University.

The University is actively using the UKRIO/ARMA *Research Ethics Support and Review in Research Organisations Guidance (2020)* to further support the University in achieving the highest standards of research ethics review. The University has a number of systems, and processes for research ethics review and facilitation in line with the themes and principles of the Guidance, having previously adopted guidance within the *Framework of Policies and Procedures for University Research Ethics Committees (2013)*.

8. Future activities to strengthen Research Integrity and support researchers in working to the highest standards of research good practice:

- Research and KE Ethics Work-Plan: UREC Audit; Future phases of the UREC audit will look into proportionality of review and accuracy of decision making, and undertaking appropriate escalation of review by a REC, as well as an understanding of ethical issues or compliance issues by Supervisors and researchers when completing ethics-self assessments. The effectiveness of RECs would also be a future phase, i.e. are they properly constituted to review research, independent and transparent etc. The aim is to ensure that RECs are working to the required and expected standards, that they understand the difference between ethical issues and those of a compliance only nature, that researchers' self-assessments can help with future training and development needs, and that the RECs are ultimately transparent as reviewing bodies, and supportive of researchers and facilitative of research and KE activity.

- Research and KE Ethics Work-Plan: creation of Standard Operating Procedures (SOPs) for use by researchers and ethics reviewers and managers, and others managing research has commenced. A priority list of SOPs will be created in order of need or demand. The SOPs will follow best practice already in place through the University's suite of HTA SOPs as well as recommendations in the *UKRIO/ARMA Guidance doc.*

- Research and KE Ethics Work-Plan: Disseminate guidance to Masters level students and their supervisors in understanding ethical implications and the need to recognise and mitigate for them in advance of undertaking research dissertations, with or without participants.

- Research and KE Ethics Work-Plan: continuing to ensure legal, regulatory and policy compliance issues, as highlighted in the *Concordat to Support Research Integrity*, are understood by researchers and their managers in relation to the ethics applications, whereby the review of such compliance is normally outside the remit of RECs. Enhancing VRE functionality to allow low risk work with legal, regulatory and policy compliance to be re-directed from RECs to be commenced.

- Research and KE Ethics Work-Plan: further development sessions for all researchers targeting specific levels of researchers e.g., doctoral, supervisors, senior colleagues and research and KE leaders etc. Specific training for new and existing REC members. Release of a pilot online ethics training module open for use by all researchers customised to the needs of the University's researchers.

- The University will work to undertake a research integrity institutional self-assessment using UKRIO's updated *Self-assessment tool for the Concordat to Support Research Integrity*. The tool is designed specifically to help employers of researchers, such as the University, to

further identify areas of research practices, systems, policies, researcher development, and monitoring that may need review in order to adhere to the requirements and recommendations of the *Concordat to Support Research Integrity*.

- In anticipation of guidance within UK Research Integrity Office's (UKRIO's) updated research misconduct investigation procedure yet to be provided for consultation to members of UKRIO, the University will work to update its *Procedure for Managing Allegations of Research Misconduct* (Staff) and *Student Research Misconduct Regulations*, in light of the expansion of research misconduct definitions within the Concordat.

- Online/video training for staff working under the HTA research licence in use of the new Item Tracker software and guidance around the updated HTA SOPs.

- Enhancement of the University's public facing Research Governance Website through additional content and signposting to other relevant web pages, as well as better navigation and ease of access by all. The website as detailed earlier includes relevant research good practice (research integrity) and research misconduct policies and information, as well as other related research policies and codes.

- Further embedding research integrity (research good practice) into the Researcher Development Programme and other researcher events, taking good practice from the existing research integrity training provision as provided to Doctoral Researchers.

9. COVID-19 pandemic response (research)

The GS has provided regular updates during the pandemic to the doctoral research community, to highlight process changes as a result of the pandemic (e.g. extensions to funding and end dates, and the flexible use of mitigating circumstances); how to access resources and events; links to DRDP sessions; and, GS run wellness and wellbeing workshops (including wellbeing when writing sessions, yoga classes, and online social spaces, and writing retreats).

The re-opening of labs for HTA related work has been closely managed through the School and local lab Teams alongside the University HTA Designated Individual and Research leads. Safety requirements to be followed by researchers have been enhanced and provided to all seeking to re-enter the lab.

In September 2021 the UREC and PVC Research worked with University's Being Safe Feeling Safe (BSFS) Group (set-up for COVID-19 safe working purposes), to publish new guidelines in light of some easing of travel restrictions. The University allowed some face to face research interactions, and as well as REC approval remaining a requirement, including for low risk research where participant face to face interaction was proposed, the importance of dynamic and robust risk assessments and the responsibilities of the researcher were highlighted further and additional guidance provided to researchers. The UREC has worked closely with SHW Team to ensure that the University's duty of care towards its researchers and research participants is met by working closely with research teams proposing overseas in person participant facing interactive research fieldwork which is conducted world-wide by the University's researchers across a large number of disciplines.

Further information

This statement was prepared by Huzma Kelly, Research Ethics and Integrity Officer (REIO) on behalf of Research Committee (1st March 2022) and noted by Academic Council (7th April 2022).

More details can be sought from the REIO by email to research-knowledge-exchange-office@westminster.ac.uk

UNIVERSITY OF
LEADING
THE WAY
WESTMINSTER田

Acronyms/definitions

Advance HE	Advance Higher Education, sector agency in Higher Education
AE	Adverse Event
ARMA	Association of Research Managers and Administrators
AY	Academic Year
CEDARS	Culture, Employment and Development in Academic Research Survey
COVID-19	Coronavirus Disease 2019
CREC/s	College Research Ethics Committee/s
DRDP	Doctoral Researcher Development Programme
DProf.	Professional Doctorate
ECR	Early Career Researcher
GDPR	General Data Protection Regulations
GS	Graduate School
HRA	Health Research Authority
HR EiR	Human Resources Excellence in Research (European Commission)
HTA	Human Tissue Authority
HT Act	Human Tissue Act (2004)
LRIC	London Research Integrity Consortium
MPhil	Master of Philosophy
Named Persons	the designated, publicly named persons, as per the University's Research Misconduct Procedure and Student Misconduct Regulations, for receiving allegations of potential or suspected research misconduct
OA	Open Access
OSHENS	**O**ccupational **S**afety **H**ealth and **EN**vironment **S**oftware; the University's online safety health and wellbeing incident and accident reporting system
PI	Principle Investigator
PhD	Doctor of Philosophy
PVC	Pro Vice Chancellor
REIO	Research Ethics and Integrity Officer
RDF	Researcher Development Framework
RDO	Researcher Development Officer
RDP	Researcher Development Programme
RDMO	Research Data Management Officer
RDWG	Researcher Development Working Group
REC	Research Ethics Committee
RGF Group	Research Governance Framework Group
RKEO	Research & Knowledge Exchange Office (University of Westminster)
RDM	Research Data Management
SAE	Severe Adverse Event
SHW	Safety Health and Wellbeing
SOP	Standard Operating Procedure
UKRIO	UK Research Integrity Office
UREC	University Research Ethics Committee
UUK	Universities UK
VC	Vice Chancellor
Vitae	non-profit, part of Careers Research & Advisory Centre (CRAC) Ltd.