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Research Integrity Annual Narrative Statement, February 2021

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. Recently, the University has joined the London Research Integrity Consortium (LRIC) and is represented by the Research Ethics and Integrity Officer (REIO), so we can further contribute externally to developments in the sector and collaborate with all those involved, and continue to reflect developments in research good practice internally.

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 January 2020-February 2021:

In summary, in the last year, we have revised and updated significantly for content and guidance our _Codes of Practice relating to Research Ethics and Research Good Practice_, the revision was based on the new Universities UK (UUK) _Concordat to Support Research Integrity (2019),_ **please see Section 3 below** for further information. The University also updated and published its revised _Intellectual Property Policy_. We have widely grown the research support available at the University through the formation of a new and expanded Research & Knowledge Exchange Office (RKEO). We have developed and launched a Researcher Development Programme (RDP) mapped to _Vitae's Researcher Development Framework_ and the _Concordat to Support the Career Development of Researchers (2019)._ In November 2020, the University retained the European Commission's HR Excellence in Research (HR EiR) Award.

We have re-organised our research ethics review systems to allow the University Research Ethics Committee (REC) to better fulfil its role to act as an oversight body for the institutional REC review processes, systems, standard operating procedures (SOPs), and guidance and training, available to researchers and reviewers. The University has introduced an audit functionality to its online research ethics management and review system: the Virtual Research Environment (VRE), to monitor decision-making and outcomes of REC review and supervisor review, as well as research ethics self-assessments. We have introduced new automated research ethics application status reports for research regulated by the Human Tissue Authority (HTA), whose remit is defined in the Human Tissue Act 2004 (HT Act). We continue to strengthen support for our researchers working under the HTA research licence through significant updates to our Standard Operating Procedures (SOPs) in line with the _HTA's Codes of Practice and Standards_.

We support researchers at all levels of their career, across the research life cycle via the new and existing University structures. Researchers receive regular updates on developments through enhanced communication channels and a number of new events and workshops, which have moved online during the pandemic. **Please see a selection of highlights below:**

- The Research Governance Framework (RGF) Group (reporting to Research Committee) undertook a review and revision of the *Code of Research Good Practice* and the *Code of Practice Governing the Ethical Conduct of Research*

- The University commenced a benchmarking exercise of existing research ethics review guidance and procedures using the *UKRIO/ARMA Guidance for Research Ethics Support and Review in Research Organisations document.*

- The University's HTA Steering Group (reporting to UREC) has updated a number of Standard Operating Procedures (SOPs) around activities relating to relevant material and scheduled activities, as required by the HTA and its *Codes of Practice*. The SOPs for Consent, Managing Participant Complaints, Adverse Events, third party-consent agreements and import and export of relevant material, have been disseminated to those working under the licence as well as REC reviewers. The SOPs can guide all researchers and reviewers of research in best practice, not only those working with relevant material as defined by the HT Act.

- The University is 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'.

- New reporting tool in the VRE system for use by researchers to alert the RECs of Adverse Events (AE) and allow RECs to monitor and report (and audit), as well as pause research ethics approval until appropriate mitigations have been carried out and evidenced. Enhanced the existing University Safety, Health and Wellbeing (SHW) Accident and Incident Reporting System, OSHENS, so pertinent data can be extracted for reporting and addressing AEs. External AE/SAE reporting requirements have been strengthened in the new *Code of Practice Governing the Ethical Conduct.*

- Significant revisions and enhancements have been made to the VRE to allow more oversight by UREC via monitoring, reporting and auditing tools. This included the addition of further guidance for researchers within the research ethics review application forms.

- The University appointed a dedicated Researcher Development Officer (RDO) based in the RKEO, and the Researcher Development Working Group (RDWG) (reporting to Research Committee), completed HR EiR and Vitae exercises, retained the HR EiR Award, and held a University RDP launch event, with 80 attendees from across the University. The Group works with UREC to provide research ethics training workshops for researchers, which have been well received and attended online during the pandemic period.

- The RDP provided a range of new workshops for researchers, including: 'Intellectual Property for Research'; 'Managing your Research Project'; and 'Introduction to Research Data Management', all of which focused on researchers' legal and professional responsibilities.

- The CEDARs Survey was undertaken by the RDWG and addressed three key areas: 'recognition and value'; 'professional and career development'; and 'environment and culture' - and was open to all research staff.

- The Professors' and Readers' Survey, carried out by the Professors' and Readers' Representatives (Research Committee), sought to identify barriers facing the development

and support of researchers' plans and ambitions. Outcomes of the survey are being considered through a planned workshop including Heads of Schools and Colleges, to explore high level strategies for promoting research.

- The University piloted mentoring circles for Early Career Researchers (ECRs) across the institution in 2020, encouraging peer to peer experience sharing and accountability across disciplines. The scheme received positive feedback and is being expanded to cater for more specific staff groups this year.

- The Graduate School (GS) launched a new dedicated Doctoral Researcher Development Programme (DRDP) website in 2020 to provide an overview and full details of all workshops and developmental opportunities available each year. The programme also moved from a cohort-based structure, allowing doctoral researchers to create a bespoke development plan in discussion with their supervisors.

- The University appointed a Research Data Management Officer (RDMO) and a Contracts Partner (based in the RKEO) to further support researchers with their legal and professional responsibilities. Both liaise closely with the REIO.

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 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* (2020) *Code of Practice Governing the Ethical Conduct of Research* (2020). The Codes were approved by Research Committee (June 2020, and noted by Academic Council, also June 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.

The *Code of Practice Governing the Ethical Conduct of Research* was reviewed, revised and edited significantly for content primarily to strengthen legal and regulatory requirements of research, in particular with regard to the HTA and Health Research Authority (HRA), as well the General Data Protection Regulations (GDPR). The Code references a number of SOPs for use by researchers in order to better align the process (SOPs) with the policy (Code) and ensure a high quality and consistency of the standards employed by our researchers when carrying out research. The Code

also introduced further devolution of research ethics review and decision-making to the College Research Ethics Committees (CRECs) from September 2020.

An updated *Intellectual Property Policy* was approved by Academic Council in January 2020 and is also published. The University's updated *Research Units Policy* was also approved by Academic Council in January 2020 and is published internally. The University published a *Knowledge Exchange Strategy* which was approved by Academic Council in April 2020.

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.

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 Malcolm Kirkup) 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). The RDP Workshop, 'Research Team Leadership' (facilitated by Advance HE) provides information to managers of researchers around receiving reports of misconduct or discrimination. 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.

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) which has been significantly updated in the past year, 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. The site has recently been updated to enhance the user experience. The CRECs will be provided access to this site to assist them in further understanding the research ethics and compliance requirements of such work, and so they can disseminate this practice to other researchers who may require advice when preparing their research ethics application.

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 supported researchers via research impact workshops and advice emphasising the need for considerate engagement with external partners that is responsive to their needs and circumstances.

The Research Data Management (RDM) public website has also been enhanced and expanded to support researchers with new training videos, guidance and resources, including help with writing a Research Data Management Plan. The University's RDM Working Group also re-convened in 2020-21 with a review and update of the associated RDM Roadmap.

Due to the unprecedented shift to online working, we have progressed from offering fragmented, one off researcher (staff) induction sessions to offering ongoing support for new colleagues to help them engage with research via our new intranet Communications site, where research colleagues can find links to several resources and contacts that a new colleague might need to grow.

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 new RKEO colleagues also received a customised briefing on matters relating to research ethics, with further briefings on research integrity and governance planned to ensure that those supporting research are up-to-date with University, and key, external developments.

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, an update on *UKRIO's recent Checklist for Researchers working during the pandemic*, was disseminated to all researchers at the University via the RKEO newsletter.

The RKEO blog also provided 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 2019/20			
	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).

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 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.

In November 2020, the UREC considered a summary and action plan relating to 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:

- The RGF Group is set to undertake a further research integrity institutional self-assessment using UKRIO's forthcoming 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_.

- The RGF Group will focus on review and revision of 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. The University will be guided in its review of its research misconduct procedures, by _UK Research Integrity Office's (UKRIO's)_ updated research misconduct investigation procedure in due course.

- Security Sensitive Research Materials process to undergo further embedding institutionally via the creation, dissemination and implementation of the University's _draft 'Security Sensitive Research Materials Guidance for Researchers'_, based on the UUK _Oversight of Security Sensitive Research Material in UK universities guidance_ 2019 update.

- The RGF Group/UREC management to consider enhanced guidance for REC review, systems, support and facilitation, via updated SOPs using _ARMA/UKRIO Research Ethics Support and Review in Research Organisations_ guidance. UREC Audit of REC review, carried out in AY 2019/20.

- 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.

9. COVID-19 pandemic response (research)

The Health Innovation Ecosystem and the Health Innovation and Wellbeing Research Community co-organised a virtual conference in June 2020, entitled '_Researching under COVID-19: Practical and ethical issues'_, including, providing advice and support to conduct responsible and robust research in the COVID-19 context. The event was attended by over 80 participants from across the University and was opened by the VC.

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).

In response to the UK national lockdown in March 2020, the UREC published guidance to researchers to halt all face to face research interactions and to switch to remote research or halt it completely if this was not possible. Students carrying out research were advised to discuss their options with their supervisor. All researchers were advised to re-seek consent from participants for switching to remote research and update their risk assessment documents. Further in September 2020 when there was some easing of travel restrictions the University allowed some face to face research interactions, and REC approval became a requirement, including for low risk research where participant face to face interaction was proposed.

The default position and message to researchers is that **where the research can continue to be conducted remotely without compromise to the validity and integrity of the research, it should continue to be done so and the previous research ethics guidance remains in place with regard to switching from face-to-face to remote**. As of January 2021, the UK Government has enhanced its travel restrictions, and the UREC Coronavirus page has been updated.

HTA research management: there has also been a moratorium in place for HTA research work since March 2020. The standards around storage of such materials continued to be managed to the appropriate and high standards by Lab Technical colleagues working closely with Estates and SHW Teams. AEs, incidents and near-misses continue to be monitored and there are 24-hour emergency designated contacts advertised. The Teams responsible for the HTA material worked off-site and on during the pandemic. The HTA moratorium remains in place. Other lab research requires COVID-19 specific laboratory risk assessments and mitigation implementation to ensure the safety of those working on site.

Further information

This statement was prepared by Huzma Kelly, Research Ethics and Integrity Officer (REIO) on behalf of the Research Governance Framework Group, and approved by the Research Committee (10 February 2021) and noted by Academic Council (24 February 2021).

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

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.