

2018 Annual statement regarding compliance with Universities UK Concordat to Support Research Integrity

Background

The Universities UK (UUK) Concordat to support research integrity requires universities to provide a short annual statement to their governing bodies regarding support for research integrity and compliance with the Concordat.

Compliance with the concordat to support research integrity is a condition of grants for all HEIs eligible to receive the research funding administered through Research England. Keele confirms in its annual assurance return to the Office for Students (OfS) that it complies with the concordat, particularly in relation to its recommendations for internal processes and guidance, and for staff training.

This is Keele University's annual statement for 2017/18, which will be provided to the University's Research Governance and Integrity Committee, Research Committee, Senate and Council for approval. This statement will also be made publicly available on the University's website.

The University senior sponsor for research integrity is the Pro-Vice-Chancellor (Research and Enterprise), the University's administrative lead is the Head of Research Integrity.

Annual Statement

Keele University is committed to ensuring the highest standards of research integrity in all aspects of its research activities, and expects its researchers to maintain a similar commitment. Keele University welcomes the UUK Concordat to Support Research Integrity and supports the five commitments contained within the Concordat.

The University recognises the need to ensure standards and legislative requirements are met in a consistent and robust manner. The University has a Quality Management System in place to manage compliance with the standards governing our research activity. This Quality Management System comprises three main aspects: (1) the University's policies and procedures to define the standards and outline processes by which those standards are applied; (2) the training and development of research staff, to support them in applying and promoting these standards in their research; (3) processes and mechanisms by which the University maintains oversight of the ongoing application of these standards and investigates concerns about research integrity.

The four key elements of research integrity (honesty, rigour, transparency and open communication, and care and respect) outlined in the Concordat are reflected in the University's Quality Management System.

Policies and procedures:

The University has a Code of Good Research Practice¹ and a Code of Practice for Student Academic Misconduct² which outlines the University's expectations of the behaviour of all staff and students engaged in research. These documents also include the University's definition of misconduct in research. The Code of Good Research Practice was last reviewed in April 2017. The code reflects a number of other policies including:

- Data Protection³
- Management of Conflicts of Interest⁴
- Research Governance Framework for Health and Social Care⁵
- Research Data Management⁶
- Research Ethics

Where an area of work represents significant risk or there is otherwise a requirement for it, the University will specifically describe processes required to meet standards or legislative requirements through standard operating procedures (SOPs). SOPs are subject to periodic review to reflect changes in legislation, regulatory and funder requirements as well as evolving research practice. Currently the University has SOPs in the following areas:

- Clinical research, particularly Clinical Trials of Investigational Medicinal Products
- Scientific research involving the use of animals
- Research involving human participants, their data or bodily material
- Open Access to research publications
- Ethics Committee Review of Research

These policies are reviewed on a regular basis to ensure they meet the requirements of our evolving research portfolio, and can be found on the University's Research Integrity webpages and Policy Zone. Communications on research ethics and integrity processes are made to staff and students through the University's internal communications channels. Research integrity is a standing item on the University and Faculty Research Committees.

In addition to this, Faculties are encouraged to develop local processes to promote a culture of research integrity, these may include:

- Peer review processes
- Symposium/Seminar series and academic discussion
- Open access to research data
- Ethics Committee Review of Research

Keele is committed to the principle that researchers should publish their results freely, ensuring their work is available to other researchers and the public. The University proactively publishes publicly-funded research outputs through its research repository, and actively manages situations where restrictions exist on publication accessibility. Currently around 74% of the content on the repository is freely available to all through open access publication.

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<https://www.keele.ac.uk/media/keeleuniversity/policyzone/sas/Approved%20Code%20of%20Good%20Practice%20Version%204-0%20April%202017.pdf>

² <https://www.keele.ac.uk/media/keeleuniversity/policyzone/sas/student-academic-misconduct-CoP.pdf>

³ <https://www.keele.ac.uk/media/keeleuniversity/sas/governancedocs/Final%20DPA%20Policy.pdf>

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<https://www.keele.ac.uk/media/keeleuniversity/hr/consultancyandexternalinterests/Policy%20for%20the%20Management%20of%20Conflicts%20of%20Interest.pdf>

⁵ https://www.keele.ac.uk/media/keeleuniversity/sops/healthandsocialcare/pol01/HSCR-POL-01_Policy%20for%20H&SC%20Research_V1.0.pdf

⁶ [https://www.keele.ac.uk/raise/researchsupport/researchoperations/researchdatamanagement/Version 1.0 30-Nov-2018](https://www.keele.ac.uk/raise/researchsupport/researchoperations/researchdatamanagement/Version%201.0%2030-Nov-2018)

The University has also launched a repository for research data underpinning published research made available for open access. It builds on and greatly facilitates existing good practice within the University as highlighted by key stakeholders in recent publications⁷.

Training and Professional Development

The University recognises that the ultimate responsibility for personal and professional development of researchers lies with the individual and provides a supportive environment with open access to opportunities for training or personal reflection. The University benefits from membership of Vitae and the UK Council for Graduate Education (UKGCE) and benchmarks development opportunities against the Researcher Development Framework in order to develop more effective and successful researchers with a specific emphasis on research integrity.

The University seeks to ensure that all researchers are aware of and understand the policies and principles relating to ethics and integrity. The University supports researchers through the provision of learning and development opportunities to ensure compliance with policy in mandating training in certain key areas. This training is organised by the University's Academic Development team or provided by partner organisations where required.

The training programme provides opportunities for recommended training in areas supporting research integrity such as:

- Good Clinical Practice as legislated by the Medicines for Human Use (Clinical Trials) Regulations
- Data Protection Act and Freedom of Information Requests
- Discipline specific research methodology and ethical considerations
- Publications and presentations
- Intellectual Property management including conflicts of interest and transparency
- Animals (Scientific Procedures) Act
- Human Tissue Act
- Plagiarism and Research Misconduct
- Information Security

In addition to the above, the University is currently piloting a Recognition and Induction Framework for newly promoted research staff which encourages researchers to develop their careers in line with individual aspirations and university expectations. This has received a 100 per cent uptake of the offer for career coaching. In order to meet demand, the University has invested in increasing the number of professionally qualified coaches in the University.

The University recognises the need for a flexible and dynamic training package to respond to changes in research focus in the staff and student populations, as well as external forces such as changes in legislation or funder requirements. The University's training needs are held under review by the Research Governance and Integrity Committee.

Ongoing Review and Oversight:

The University will maintain awareness of the conduct of researchers to identify and promote best practice. Giving researchers the opportunity to demonstrate good scholarship is a key aspect of this. In addition researchers are frequently in contact with external agencies and bodies to discuss their research activities, examples include:

- Statutory MHRA/HTA Inspections
- Funder visits
- Audits of clinical trials
- Internal audits of stored human biomaterials
- Audits of ongoing compliance with GDPR requirements

⁷ <http://www.methodologyhubs.mrc.ac.uk/files/7114/3682/3831/Datasharingguidance2015.pdf>

Misconduct:

The University provides assurance that the processes in place for dealing with allegations of misconduct are transparent, robust and fair and that they are appropriate to the needs of the organisation. The University has a policy for the investigation of allegations of research misconduct. There were no formal investigations of research misconduct undertaken during the period 30 September 2017 to 29 September 2018. The University has performed two informal investigations under its policies for research misconduct, one from a member of staff and another involving a student.

Future plans:

Keele University now wishes to strengthen its commitment to improve research integrity standards and the transparency and openness of the University's research. The following statements summarise our future strategy to raise standards in the conduct of research within the University.

Policies:

Further policy review and development is scheduled in the following areas:

Research Area	Due Date
Use of Human Biomaterial In Research	Summer 2019
Integrity in Research Partnerships	Spring 2019

The University's research quality management systems will be developed (including the above policies) in response to research needs, identified best practice and evidences of shortfall in research standards.

The University recognises the key role in review processes in supporting and enhancing research in a proportionate and pragmatic manner. The University will undertake development of services to build in key performance metrics by which to assess the needs of the research community to inform processes and provision of support.

Training and Professional Development:

The University continues development of a central research integrity website, providing researchers with access to a comprehensive toolkit of resources covering the use of:

- Human participants, their data or bodily material
- Research with identified ethical issues, e.g. security, culturally valuable artefacts
- Research involving security-sensitive material

This website will provide:

- Access to standard operating procedures
- Templates of essential documents
- Examples of good practice
- Guidance and reference materials including links to external sources of information
- The option to request specific support and guidance for a research activity

This centralised provision will be expanded to other areas of research, acknowledging the fact that one size does not fit all and information should be provided in a modular fashion to facilitate cross-disciplinary research involving a number of areas and methodologies. In the short term an assessment of existing training provision will be undertaken to identify areas of strength and best practice while highlighting areas of growth and unmet training needs at the University.

Ongoing Review and Oversight:

The University will develop and identify mechanisms to allow oversight and inspection of key activities that support researchers in developing processes that promote research integrity, and identify good practice. This will link into existing processes and may involve:

- Funding application procedures
- Staff career review/assessments
- Auditing of specific studies and/or processes
- Self-assessment by researchers
- Peer group consideration of challenging or novel research areas
- Mentorship programmes