

Bangor University

Annual Statement on Research Integrity

October 2022

Background

1. Research Integrity is a guiding principle for all activity at Bangor University (“University”), as set out in the University’s Strategy 2030 Document: *‘We act with honesty and transparency and will seek to collaborate in all we do. We will facilitate intellectual growth through academic freedom, creative expression and communication of truth, knowledge, social and moral development’*. A key strategic focus area for the University, we are dedicated to supporting the highest levels of research integrity and excellence. The University is fully committed to upholding the principles and practices of the Universities UK Concordat to Support Research Integrity (“Concordat”)
2. This is the University’s second Annual Statement on Research Integrity (“Annual Statement”) covering the period 1st August 2021 to 31st July 2022. As recommended by the Concordat, this Annual Statement has been approved by the University Senate, Executive and Council and will be made publicly available on the University’s website.
3. The Concordat obligates its signatories to prepare a short annual statement to their governing body, reporting:
 - (i) a summary of actions and activities that have been undertaken to support and strengthen understanding and the application of research integrity issues;
 - (ii) a statement to provide assurance that the processes the institution has in place for dealing with allegations of misconduct are transparent, timely, robust and fair, and that they continue to be appropriate to the needs of the organisation;
 - (iii) a high-level statement on any formal investigations of research misconduct that have been undertaken, which will include data on the number of investigations. If no formal investigation has been undertaken, this should also be noted;
 - (iv) a statement on what the institution has learned from any formal investigations of research misconduct that have been undertaken, including what lessons have been learned to prevent the same type of incident re-occurring; and
 - (v) a statement on how the institution creates and embeds a research environment in which all staff, researchers and students feel comfortable to report instances of misconduct.
4. This statement covers the period 1st August 2021 to 31st July 2022.

Actions and activities undertaken

1. The University fully recognises the imperative to maintain the highest standards of research integrity and, therefore, seeks to comply with the Concordat, by monitoring and continuously promoting best practice. As part of this the University, and within the period of this statement, has begun a review of its research governance process. This has included:
2. Developing and embedding the role of Senior Research Governance & Policy Officer.

Reporting to the University Secretary, the Officer has responsibility to oversee research governance centrally and to develop and manage policies, systems and procedures, promote best practice and support the University in meeting its obligations under the terms of the Concordat.

3. Developing and embedding the role of Associate Pro-Vice-Chancellor, as the academic-lead, to restructure the University's research integrity and governance arrangements, to improve support and training across the University's College, Schools and research-active staff
4. Continuing to embed research integrity and governance (including due diligence etc) as well as contracts, including commercialisation contracts and agreements, under Governance Services
5. Purchased and started the development of a new electronic ethics approval system to provide an integrated system for the University's research ethics review processes including both its human and animal portfolio. The system is being implemented under the guidance of a working group consisting of representatives from the three academic Colleges, including from the University's Academic Research Ethics Committees. The work is being led by the University's Digital Services supported by Governance Services.
6. Systems exist to support the management of major structural/infrastructure awards. For example, for some major research projects (e.g., Welsh European Funding Office), or for those with particular challenges, the University has regular project and programme boards to scrutinise returns to funders and monitor progress and performance.
7. A new Research Integrity Policy was approved by the University Senate in September. Cementing the five key principles of the Concordat to Support Research Integrity, the Policy also lays out the procedure for investigating allegations of research misconduct. The Policy and the Concordat apply to all University staff and students involved in research on behalf of Bangor University and are designed to provide researchers with standards and guidelines in relation to the conduct of high-quality and ethical research.
8. Included in the new Research Integrity Policy is a procedure for investigating research misconduct. Concerns about or allegation of research misconduct can be brought to the attention of the Senior Research Governance & Policy Officer. In the first instance, the Officer will consider concerns or allegation on its merit, and if the situation requires, will instigate an investigation within 5 working days.
9. As part of the new Research Integrity Policy, the Senior Research Governance & Policy Officer has recruited a number of School-level Research Integrity (RI) Leads. These individuals will act as a local point of contact for staff and students, to promote and raise the profile of research integrity, signpost training, and support the university's research integrity training and policies within their College research institutes and Schools. Each individual will provide advice to researchers (staff and students) about good research practice, research ethics and / or research integrity; and support staff who wish to raise concerns about research integrity. RI Leads will be line managed by their Research Institute Directors.
10. In response to the House of Commons Science and Technology Committee recommendations of July 2018 and the Government's recognition of the services provided by the UK Research Integrity Office (UKRIO), Bangor University has become a UKRIO subscriber.

11. Some key new additions have been incorporated into the University Research Ethics Policy relating in particular to:

- i) A need for Deans of College to ensure any research requiring review by external research ethics committees are adequately assessed as suitable for sponsorship by the university.
- ii) A need for Bangor University Academic Research Ethics Committees (ARECs) to operate in accordance with the core concordat principles of independence, competence, facilitation, transparency & accountability
- iii) Ensuring that lay members or members from other colleges and universities are appointed to ARECs
- iv) A need for all research involving human participants to be reviewed by either an appropriate University AREC or when certain conditions were met an appropriate external research ethics committee (e.g., for MoD or NHS-related research projects)
- v) A need to stream all research involving human participants into five separate Categories (A-E).
- vi) The need to conduct due diligence on non-human genetic resources (plants, animals, and microorganisms) from non-UK countries along with their associated traditional knowledge (aTK) as per the Nagoya Protocol and the UK Access and Benefit Sharing (ABS) Regulations

12. Bangor University has invested £50K into using the Epigeum training packages *Research Integrity Second Edition UK* and *Ethical Research UK* for a period of 3 years. The online software will be rolled out on Blackboard and Bangor University Digital Services intend to work on publishing a Welsh translation of some Epigeum modules.

Current policy, procedure, and guidance

1. Research integrity is supported across the University. Governance Services and IRIS work closely with Academic Colleges and Schools to ensure that policies and guidance are fit for purpose. This co-operation is key to strengthening research integrity.
2. The University recognises the importance of maintaining the highest standards of research integrity and seeks to comply fully with the Concordat to Support Research Integrity. Overall responsibility for research integrity and research governance rests with the Pro-Vice-Chancellor (Research). The design and operation of policies and good practice are the responsibility of the Deputy Secretary and Head of Governance Services who has designated the Senior Research Governance & Policy Officer to oversee this area.
3. Deans of College, Heads of School and Research Institute Directors are responsible for local research integrity arrangements, and periodically reviewing integrity processes within Research Institutes and Schools, to ensure these remain fit for purpose. They must ensure that, in accordance with the Research Ethics Policy, at least one AREC, which meets the needs of their College, Institute, and its constituent Schools, has been established with an appropriate membership, terms of reference and process for monitoring and review of matters relating to research integrity. Otherwise an agreement must exist to operate and review matters relating to research integrity through another appropriate AREC.
4. In addition, the Associate Pro-Vice Chancellor for Research Governance provides academic strategic direction for research governance with the Chairs of the Academic Research Ethics Committee. Heads of Schools are expected to take responsibility for ensuring appropriate strategic direction of research and that there is effective supervision of researchers within their Colleges and Schools, including initial advice on matters of research integrity and academic conduct, with concerns around academic misconduct being handled by Governance Services

5. The University Research Governance and Ethics Committee, a sub-committee of the University Senate is the overarching Committee at Bangor University for the consideration of research governance and ethical issues. The Committee advises on broad strategies for ethics and monitors the University's overall performance rather than considering individual matters such as research proposals. The Committee has devolved responsibility for the ethical review and approval process in its three colleges to the relevant College AREC.
6. Chairs of ARECs provide the University Research Governance and Ethics Committee with reports at each meeting, which will include submitting an annual report to the first meeting of the academic year. They can refer any matters of ethical concern to the Senior Research Governance & Policy Officer who serves as Secretary to the Research Governance and Ethics Committee and will establish a subcommittee of the Research Governance & Ethics Committee, where appropriate to consider the matter and make recommendations.
7. The University Research Integrity Policy sets out guidelines on the issues involved in the proper conduct of research, and on the standards expected. The Policy states unequivocally that the University requires all academic staff to maintain high standards of academic conduct and, in the context of research, be aware of the extreme seriousness of academic fraud, and to be alert to the need to avoid such conduct, whether by fabrication of research results, plagiarism or otherwise.
8. The Policy requires honesty, openness, accountability, and integrity are vital qualities for any academic researcher no matter what their discipline or level of experience.
9. It is expected that all research-active students and staff shall:
 - take steps to acquaint themselves with the Policy in relation to matters of conduct, finance, or safety relevant to their area of research;
 - observe such legal and ethical requirements as are laid down by the University or such other properly appointed bodies as are involved in their field of research;
 - take steps to secure the safety of those associated with the research;
 - report any conflict of interest, whether actual or prospective, to the appropriate authority; observe fairness and equity in the conduct of their research.
10. The university complies with all relevant statutory and external regulatory requirements including for example, the Animal Welfare Regulations, Human Tissue Regulations and Health and Safety at Work regulations.
11. The Animal Welfare and Ethical Review Body (AWERB) is responsible for the ethical review and approval of all research involving animals at the University as set out in the Animal Welfare and Ethical Review Process. The AWERB reports to the University Research Governance and Ethics Committee.
12. The key regulated area of Human Tissue is managed at a College level, with operational oversight being provided by Governance Services. Any activity within the University that involves the use of organs, tissues, and cells (including saliva, blood etc. which contain cells), must follow strict Standard Conditions and researchers must ensure that their use of human tissue has been ethically approved through the Integrated Research Application System and that the appropriate consent is in place. Researchers wishing to undertake research involving human tissue must consult with the University's Human Tissue Designated Individual (DI) prior to the commencement of any research. Clinical research is reviewed and approved by the Health Research Authority and NHS Research Ethics Committees and all clinical trials are

publicly registered.

13. Other key regulated areas are managed at their respective college level and have included approval, accreditation, or recognition from a diverse range of Professional, Statutory and Regulatory Bodies such as the Nursing and Midwifery Council, Health and Care Research Wales, Estyn, Advance HE, Chartered Management Institute and the Health and Care Professions Council.
14. The University seeks to comply fully with the requirements of GDPR including as it applies to research activity. Advice and guidance on GDPR matters sits within Governance Services and is closely linked to the research governance and ethics function. It is a condition of employment that staff will abide by the data protection rules and policies of the University. In particular, all staff must ensure that:
 - all personal information entrusted to them in the course of their employment is kept securely.
 - no personal information is disclosed either verbally or in writing, accidentally or otherwise to any unauthorised third party.
 - no personal information should be accessed by staff for any reason other than for legitimate University business.
 - any information that they provide to the University in connection with their own employment is accurate and up to date and that they inform the University of any changes, e.g., changes of address.
15. In terms of training, the University is also a signatory of the Researcher Development Concordat and, since 2015, has run a working group, led by a University Dean, to implement, embed and promote the principles of this Concordat and to promote best practice; for example, in the training of Early Career Researchers. The group brings together key support staff as well as academic representatives from across the University and reports directly to the University's Research, Innovation, and Impact Strategy Group (RIISG).
16. The Senior Research Governance & Policy Officer and the Associate Pro-Vice-Chancellor will ensure coaching on research integrity related topics will be available through the University's HR Staff Induction Development Programmes. As part of a wider research discussion, additional programs for university-wide training in research integrity are being actively sought such as courses in communication, social responsibility, conflicts of interest, research planning, export controls and Intellectual property

Statement on formal investigations of Academic Research Misconduct

1. During the 2021/22 academic year to date, no allegations were taken forward to a formal investigation. No allegations were recorded for the preceding two years:
 - nil was dismissed at the preliminary stage; and
 - nil cases are still being considered
2. During the 2021/22 academic year, an informal investigation from the previous year around ophiological naming conventions was referred to the UKRIO for advice.
3. A table has been assigned in Annexe 1 for the past 3 completed academic years with year 1 representing the most recently completed year.

Lessons from formal investigations of research misconduct that have been undertaken

1. Within the last year, there have not been any formal investigations of misconduct. The University bases its processes for undertaking investigations on the guidance provided by UKRIO and draws on connections with the wider research management community to inform any refresh to our policies. The University remains vigilant and takes seriously any allegation and as supporters of the concordat to support research integrity, we are committed to:
 - maintaining the highest standards of rigour and integrity in all aspects of research
 - ensuring that research is conducted according to appropriate ethical, legal, and professional frameworks, obligations, and standards
 - 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
 - using transparent, robust, and fair processes to deal with allegations of research misconduct should they arise
 - working together to strengthen the integrity of research and to reviewing progress regularly and openly
2. The procedure has been updated by the Senior Research Governance and Policy Officer. Review and, where necessary improvement, of research misconduct processes will continue to form part of the University's review of research governance and integrity arrangements.

Embedding a research environment that encourages openness and willingness to report instances of misconduct.

1. The University research CoP promotes an awareness of the need to maintain high standards of academic conduct in terms of positive characteristics of honesty, openness, accountability and integrity, as vital qualities for any academic researcher no matter what their discipline or level of experience. Through multiple mechanisms, including the staff Professional Development Reviews, the operation of the Researcher Development Concordat, the recently revised mentorship programme and PhD supervisor and staff training, we seek to ensure that individuals are empowered to raise concerns where instances of bad academic practice or malpractice may have occurred. A process whereby individuals can approach the Senior Research Governance & Policy Officer in confidence will be made aware to staff and appropriate steps undertaken. The University also has a Public Interest Disclosure (Whistleblowing) Policy and Procedures.

Preparation of this statement

1. This statement was prepared and coordinated by the Associate Pro-Vice Chancellor for Research Governance, the University Secretary, the Head of Research and Impact Support and the Senior Research Governance and Policy Officer.
2. The statement was presented and approved at a meeting of the University's Senate on 5th December 2022.

Robert Rogers (Associate Pro-Vice Chancellor for Research Governance)

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November 2022

