

# Research Integrity and Misconduct

## Scope

This Policy applies to HDR UK Staff, HDR UK Secondees and HDR UK Community Members

## Purpose

This policy sets out:

- HDR UK's commitment to research integrity and its support of the Concordat to Support Research Integrity
- The process for raising concerns regarding research integrity and misconduct
- The procedure for the investigation into allegations of research misconduct.

## Responsibility

It is the responsibility of all HDR UK Staff, HDR UK Secondees and HDR UK Community Members to comply with this policy.

## Related Policies

This policy should be read in conjunction with the following policies:

- [P10 Speak Up Safely](#)
- [P26 Good Research Practice](#)

## Commitment to Research Integrity

Health Data Research UK is committed to maintaining the highest standards of rigour and integrity in all aspects of research. HDR UK and HDR UK Staff and HDR UK Secondees are required to uphold these standards through ensuring any research they undertake is done in compliance with the Concordat to Support Research Integrity.

## The Concordat to Support Research Integrity

As a supporter of the Concordat to Support Research Integrity, Health Data Research UK is committed to maintaining the highest standards of rigour and integrity in all aspects of research. The [UK Concordat to Support Research Integrity](#) provides a comprehensive national framework for good research conduct and its governance, which all HDR UK Staff and HDR UK Secondees are required to comply with.

We are committed to the following principles:

1. Maintaining the highest standards of rigour and integrity in all aspects of research
2. Ensuring that research is conducted according to appropriate ethical, legal and professional frameworks, obligations and standards
3. 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
4. Using transparent, robust and fair processes to deal with allegations of research misconduct should they arise
5. Working together to strengthen the integrity of research and to review processes regularly and openly.

Research Organisations funded by HDR UK and employers of HDR UK Community Members and HDR UK Secondees are required to have in place procedures for governing good research practice and for reporting and investigating allegations of research misconduct that meet the requirements set out in the [UK Concordat to Support Research Integrity](#).

Where research is being conducted outside of the UK, organisations receiving funding from HDR UK and employers of community members are required to have in place procedures for the identification, investigation, reporting, and resolution of unacceptable research conduct and other professional misconduct.

## Research Misconduct

HDR UK is committed to using transparent, timely, robust, and fair processes to deal with allegations of research misconduct when they arise.

Research misconduct is characterised as behaviours or actions that fall short of the standards of ethics, research and scholarship required to ensure that the integrity of research is upheld. It can cause harm to people and the environment, wastes resources, undermine the research record and damage the credibility of research and public trust.

**Research misconduct** can take many forms, including:

- **Fabrication**, making up results, other outputs (for example, artefacts) or aspects of research, including documentation and participant consent, and presenting and/or recording them as if they were real
- **Falsification**, inappropriately manipulating and/or selecting research processes, materials, equipment, data, imagery and/or consents

- **Plagiarism**, using other people's ideas, intellectual property, or work (written or otherwise) without acknowledgement or permission
- **Failure to meet** legal, ethical and professional obligations, for example:
  - not observing legal, ethical and other requirements for human research participants, animal subjects, or human organs or tissue used in research, or for the protection of the environment or breach of duty of care for humans involved in research whether deliberately, recklessly or by gross negligence, including failure to obtain appropriate informed consent
  - misuse of personal data, including inappropriate disclosures of the identity of research participants and other breaches of confidentiality
  - improper conduct in peer review of research proposals, results or manuscripts submitted for publication. This includes failure to disclose conflicts of interest; inadequate disclosure of clearly limited competence; misappropriation of the content of material; and breach of confidentiality or abuse of material provided in confidence for the purposes of peer review
- **Misrepresentation of:**
  - data, including suppression of relevant results/data or knowingly, recklessly or by gross negligence presenting a flawed interpretation of data
  - involvement, including inappropriate claims to authorship or attribution of work and denial of authorship/attribution to persons who have made an appropriate contribution
  - interests, including failure to declare competing interests of researchers or funders of a study
  - qualifications, experience and/or credentials or publication history, through undisclosed duplication of publication, including undisclosed duplicate submission of manuscripts for publication
- **Improper dealing with allegations of misconduct**, failing to address possible infringements, such as attempts to cover up misconduct and reprisals against whistle-blowers, or failing to adhere appropriately to agreed procedures in the investigation of alleged research misconduct accepted as a condition of funding. Improper dealing with allegations of misconduct includes the inappropriate censoring of parties through the use of legal instruments, such as non-disclosure agreements.

Honest errors and differences in, for example, research methodology or interpretations and poor quality research with no intention to deceive do not constitute research misconduct.

Researchers must be able to exercise freedom in their academic choices and must also accept responsibility for the decisions that they make. Thus, the primary responsibility for ensuring that they act in accordance with these principles in all aspects of their research work, including peer review, lies with the individual. Employers of researchers, funders of research and other organisations engaged with supporting research and researchers also have important roles to play.

**Researchers** are responsible for:

- Understanding the expected standards of rigour and integrity relevant to their research
- Maintaining the highest standards of rigour and integrity in their work at all times

**Employers** of researchers are responsible for:

- Maintaining a research environment that develops good research practice and embeds a culture of research integrity, as described in commitments 2 to 5 above
- Supporting researchers to understand and act according to expected standards, values and behaviours
- Defending researchers when they live up to the expectations of this concordat in difficult circumstances
- Demonstrating that they have procedures in place to ensure that research is conducted in accordance with standards of best practice; systems to promote research integrity; and transparent, robust and fair processes to investigate alleged research misconduct

**Funders** of research will:

- Publish clear statements of their expectations of researchers and employers of researchers with respect to standards of professionalism and integrity
- Take research integrity into account in the development of policies and processes
- Encourage adoption of the concordat by associating it with their funding conditions

Where research is being conducted collaboratively, and particularly within interdisciplinary or international partnerships, there needs to be clear agreement on, and articulation of, the standards and frameworks that will apply to the work. The [Montreal Statement on Research Integrity in Cross-Boundary Research Collaborations \(2013\)](#), and [The European Code of Conduct for Research Integrity \(2017\)](#) provide helpful advice on this point.

## Reporting Allegations of Research Misconduct or Concerns regarding Research Integrity

HDR UK takes research integrity very seriously. It is the responsibility of all HDR UK Staff and HDR UK Secondees to report any concerns about research integrity and research misconduct involving either HDR UK Staff, HDR UK Secondees, or research funded by HDR UK as soon as they become aware of it as described below.

Concerns regarding research integrity and allegations of research misconduct are managed by a Named Person, delegated by the Institute Director to ensure appropriate action is taken. The Named Person is responsible for:

- Receiving any allegations of research misconduct
- Initiating and supervising the procedure for the investigation of allegations of research misconduct
- Maintaining the information record during the investigation and subsequently reporting on the investigation with internal contact and external organisations
- Taking decisions at key stages of the procedure for the investigation of allegations of research misconduct

All concerns regarding research integrity or reports of research misconduct whether involving research conducted by HDR UK Staff, HDR UK Secondees, HDR UK Community Members, or research organisations funded by HDR UK should be reported to the Named Person.

The Named Person for HDR UK is Professor Cathie Sudlow, Chief Scientist, Deputy Director  
[cathie.sudlow@hdruk.ac.uk](mailto:cathie.sudlow@hdruk.ac.uk)

In the event the Named Person is not available due to absence or annual leave, or where the Named Person may be implicated in the allegation or have a conflict of interest, allegations of research misconduct should be reported to the Head of Legal, Ethics & Trust.

All reports shall be handled in the strictest confidence in line with the [UK Concordat to Support Research Integrity](#), the [UK Research Integrity Office's \("UKRIO"\) Principles for the Investigation of Allegations of Research Misconduct](#) and [P10 Speak Up Safely Policy](#).

## Investigating Allegations of Research Misconduct of HDR UK Staff

HDR UK adheres to the UK Research Integrity Office ("UKRIO") principles for the investigation of allegations of research misconduct and follows the [UKRIO Procedure for the investigation of research misconduct](#). If you have any questions or concerns about this process, please contact the Named Person as described above.

## Penalties or actions taken in the case of Research Misconduct of HDR UK Staff

If research misconduct by HDR UK Staff is found following the completion of an investigation, supplemental actions may be agreed, in addition to any disciplinary actions taken in accordance with [HR16 Disciplinary Policy](#), or legal proceedings. These may include:

- Removal, retraction or correction of published materials
- Withdrawal/repayment of Research Funding
- Notifying of misconduct to regulatory bodies (such as the MHRA, the Healthcare Commission, the Charity Commission, the Home Office, professional bodies, etc.)
- Notifying to the HDR UK Board of Trustees
- Notifying to professional bodies, in particular if the concerns relate to Fitness to Practise
- Notifying other employing organisations
- Notifying other organisations and/or collaborators involved in the research including funders; Adding a note of the outcome of the investigation to an HDR UK Staff member's file for any future requests for references
- Review internal management and/or training and/or supervisory procedures for research
- The making of any public statement necessary to protect the good name and reputation of the Institute
- Addressing and remedying any research misconduct that may have taken place

- Reporting on any procedural or organisational issues which should be reviewed by HDR UK
- Remedial training, mentoring and monitoring when the person(s) involved continue to work at or for HDR UK

If a member of HDR UK Staff has been found not to have committed research misconduct following investigation, HDR UK will support the member of HDR UK Staff as may be necessary to restore the individual's reputation and that of any relevant research project.

## **Investigating Research Misconduct by Community Members, Secondees, or Research Organisations funded by HDR UK**

Where allegations of research misconduct are made involving HDR UK Community Members, HDR UK Secondees, or research funded by HDR UK, the employing organisation shall take the lead in the investigation, consulting HDR UK about the investigation process and inviting HDR UK's direct involvement where appropriate.

HDR UK may suspend research funding, affiliation with HDR UK or secondment agreements for the duration of the investigation of the alleged research misconduct.

## **Penalties or actions taken in the case of Research Misconduct by Community Members, HDR UK Secondees, or Research Organisations funded by HDR UK**

If research misconduct is found following the completion of an investigation by a research organisation in receipt of funding from HDR UK or an employing organisation of an HDR UK Community Member or HDR UK Secondee, HDR UK may take the following actions, in agreement with the employing organisation where required:

- Removal, retraction or correction of published materials;
- Withdrawal/repayment of Research Funding;
- Withdrawal of affiliation with HDR UK;
- Termination of secondment agreement;
- Notifying other organisations and/or collaborators involved in the research including funders;
- Review internal management and/or training and/or supervisory procedures for research by HDR UK Secondees;
- Notifying the HDR UK Board;
- Notifying the Charity Commission;
- Making any public statement necessary to protect the good name and reputation of HDR UK.

## Supporting Documents

- [UK Concordat to Support Research Integrity](#)
- [UK Research Integrity Office's \("UKRIO"\) Principles for the Investigation of Allegations of Research Misconduct](#)
- [Montreal Statement on Research Integrity in Cross-Boundary Research Collaborations \(2013\)](#),
- [The European Code of Conduct for Research Integrity \(2017\)](#)