



# Process for Implementing and Monitoring the Research Integrity Policy

## CU-RIO-PRO-4.0

### Our Responsibilities

It is imperative that all members of the University recognise the responsibilities that they share for developing and maintaining a culture in which sound research practices are adopted and inappropriate ones detected and dealt with. Every employee and student of the University has a duty to inform the appropriate authorities if he/she knows or suspects that there has been a breach of good conduct.

The following points outline further specific responsibilities. Please note that the responsibilities of researchers applies to any staff and students undertaking research as well as supervisors/principal investigators and to Heads of Centre/Institute.

Professional and Support Staff are responsible for maintaining the highest standards of ethics and integrity in their work.

### Cranfield University

Cranfield University is responsible for:

- a) Maintaining a research environment that develops good research practice and embeds a culture of research integrity.
- b) Supports researchers to understand and act according to expected standards, values and behaviours.
- c) Defends its researchers when they live up to the expectations of the concordat in difficult circumstances.
- d) Demonstrating that we have procedure 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 misconduct.
- e) Have clear policies on ethical review and approval that are available to all researchers.
- f) Make sure that all researchers are aware of, and understand policies and processes relating to ethical approval.
- g) Support researchers to adopt best practices in relation to ethical, legal and professional requirements.
- h) Have appropriate arrangement in place through which researchers can access advice and guidance on ethical, legal and professional obligations and standards.
- i) Promote training and development opportunities to research staff and students and encourage their uptake.
- j) Identify a named senior member of staff to oversee research integrity and ensure that this information is kept up to date and publicly available on the Cranfield website

- k) Identify a named senior member of staff who will act as first point of contact for anyone wanting more information on matters of research integrity and ensure that contact details for this person are kept up to date and are publicly available on the Cranfield website.  
(<https://www.cranfield.ac.uk/about/research-integrity>)
- l) Have clear, well-articulated and confidential mechanisms for reporting allegations of research misconduct.
- m) Have robust, transparent and fair processes for dealing with allegations of misconduct that reflect best practice. Including, the use of independent external members of formal investigation panels, and clear routes for appeal.
- n) Ensure that all researchers and other members of staff are made aware of the relevant contacts and procedures for making allegations.
- o) Act with no detriment to whistle-blowers who have made allegations of misconduct in good faith, or in the public interest, including taking reasonable steps to safeguard their reputation. This should include avoiding the inappropriate use of legal instruments, such as non-disclosure agreements.
- p) Take reasonable steps to resolve any issues found during the investigation. This can include imposing sanctions, requesting a correction of the research record and reporting any action to regulatory and statutory bodies, research participants, funders or other professional bodies as circumstances, contractual obligations and statutory requirements dictate.
- q) Take reasonable steps to safeguard the reputation of individuals who are exonerated.
- r) Provide information on investigations of research misconduct to funders of research and to professional and/or statutory bodies as required by their conditions of grant and other legal, professional and statutory obligations.
- s) Support their researchers in providing appropriate information when they are required to make reports to professional and/or statutory bodies.
- t) Provide a named point of contact or recognise an appropriate third party to act as confidential liaison for whistle-blowers or any other person wishing to raise concerns about the integrity of research being conducted under their auspices.
- u) Monitoring these measures for suitability and effectiveness and reviewing them where necessary.

The Research and Innovation Office formulates, and is the University custodian of, research funding policies for good governance, best practice and maximising research income. It provides expert advice, manages audits, oversees compliance, and supports and develops systems to underpin the management of research. Contact [researchoffice@cranfield.ac.uk](mailto:researchoffice@cranfield.ac.uk)

## Researchers

Researchers are responsible for:

- a) understanding the expected standards of rigour and integrity relevant to their research.
- b) maintaining the highest standards of rigour and integrity in their work at all times.
- c) complying with ethical, legal and professional frameworks, obligations and standards as required by statutory and regulatory authorities, and by employers, funders and other relevant stakeholders.
- d) ensuring that all their research is subject to active and appropriate consideration of ethical issues.
- e) taking responsibility for keeping their knowledge up to date on the frameworks, standards and obligations that apply to their work.
- f) collaborating to maintain a research environment that encourages research integrity.
- g) designing, conducting and reporting research in ways that embed integrity and ethical practice throughout.

- h) acting in good faith with regard to allegations of research misconduct, whether in making allegations or in being required to participate in an investigation, and take reasonable steps, working with employers as appropriate, to ensure the recommendations made by formal research misconduct investigation panels are implemented.
- i) handling potential instances of research misconduct in an appropriate manner; this includes reporting misconduct to employers, funders and professional, statutory and regulatory bodies as circumstances require.
- j) declaring and acting accordingly to manage conflicts of interest.

## Supervisors and Principal Investigators

Supervisors/Principal Investigators are additionally responsible for:

- a) The education and training of new staff, junior staff and students to ensure that the quality and integrity of research is maintained at Cranfield University.
- b) The robust supervision of day-to-day activities.

## Directors of Theme

Directors of Theme are additionally responsible for:

- a) Ensuring that training provisions and publications resulting from this Research Integrity Framework are promulgated in their themes and that all staff and students are aware of their obligations with regard to proper research conduct.
- b) Ensuring that members of the theme are not engaged in the publication of research that is not authentic or does not add substantially to existing literature. This responsibility will in practice be delegated to principal investigators.
- c) Ensuring that all staff and students in their theme are aware of relevant protocols and procedures.
- d) Promoting and reporting on activities which ensure best research practice within their research domain.

## Students

Students are responsible for:

- a) Adhering to the highest level of research ethics, in line with requirements set out by national and international regulatory bodies, professional and regulatory research guidance and research ethics frameworks issued in appropriate areas.
- b) Applying for ethical approval for their research before data collection begins as set out in the Senate Handbook for Research Students.
- b) Remaining aware of Cranfield University's policies and procedures on good practice in research.
- c) Declaring any potential or actual conflicts of interest relating to research and where necessary taking steps to resolve them.
- d) Duly sharing their research external to the University with the full knowledge of their supervisors.

## Reviewing Allegations of Scientific Misconduct

Under the UUK Concordat, we have signed-up to the premise that "We are committed to using transparent, timely, robust and fair processes to deal with allegations of research misconduct when they arise." In 2009, the OECD Global Science Forum issued a Practical Guide to "Investigating Research Misconduct Allegations in International Collaborative Research Projects"

(<http://www.oecd.org/science/sci-tech/42770261.pdf>). The guide states that investigations should

follow an agreed, standardised and clearly defined procedure and must be conducted with appropriate transparency and in accordance with the highest standards of:

- Integrity;
- Fairness; and
- Confidentiality.

And with a commitment to there being:

- no detriment; and
- a balanced approach.

In general procedure(s) used for such investigations should:

- Have an appropriate structure;
- Define the scope and limitations for investigations and include (agreed) definitions of misconduct;
- Provide a clear sequence of steps for the investigation of an allegation;
- Provide clearly defined procedures for investigative and decision making phases and associated time guidelines; and
- Describe reporting and distribution requirements.

The following procedure for investigating Scientific Misconduct at Cranfield University following the OECD guidelines has been approved and accepted by the Research Committee. It aligns with the process for investigating Academic Misconduct.

[Senate Regulation 25](#), Academic misconduct and penalties, sets out the process for any member of the University who wishes to bring forward an allegation of academic misconduct. [The Senate Handbook on Academic Misconduct](#) supplements this regulation.

## A. Structural Requirements for the Investigation Procedure:

### Raising concerns and allegations:

Cranfield's policy on Research Integrity may be found at:

<https://www.cranfield.ac.uk/about/governance-and-policies/policies-and-regulations>

Allegations of scientific misconduct or breaches of research integrity may be made by any person either in writing, orally or by e-mail. Anonymous allegations will not be accepted.

Contact for making allegations:

Pro V-C, Research and Innovation, Cranfield University, Cranfield, MK43 0AL,  
[t.stephenson@cranfield.ac.uk](mailto:t.stephenson@cranfield.ac.uk)

### Participation:

- All parties are expected to participate in all parts of the process whether as subject, complainant, witness, investigator; decision maker, or those enforcing decisions;

All parties must support the investigation by making available materials and information relevant to the investigation. This should include but is not restricted to: data from that project, research notebooks, written and recorded (any format) testimony; and access to appropriate project staff;

- All parties are obliged to facilitate an investigation through structural support (where practical) which might include space and resources to assist an investigation; All have a duty to report poor conduct in research; and
- The participating parties have a commitment to collect and preserve information and data relevant to the investigation.

### **Investigation management:**

Apart from exceptional circumstances allegations of student academic misconduct will be investigated in line with the University process for investigating academic misconduct as detailed in the University Senate Regulations;

<https://www.cranfield.ac.uk/about/governance-and-policies>

This Procedure is to be used in conjunction with the University's existing Disciplinary Procedures and will apply to all categories of staff and students; it will be conducted with an appropriate level of confidentiality for all parties involved (subject, complainant, witnesses):

### Staff and Student academic misconduct

Allegations will be made through the Research and Innovation Office either to a confidential e-mail address managed by the Research Committee Secretary [researchcommittee@cranfield.ac.uk](mailto:researchcommittee@cranfield.ac.uk) or to the Pro-VC, Research and Innovation either in person or in writing.

Should there be a conflict of interest with any member of staff in the Research and Innovation Office, the allegation will be handled by Pro-VC, Education Services, [s.tyrrel@cranfield.ac.uk](mailto:s.tyrrel@cranfield.ac.uk).

- All material relating to the allegation and its investigation will be submitted to the Research and Innovation Office and will be held in a central electronic file.
- The Research and Innovation Office will convene a Research Misconduct Review Group (RMRG) and will inform the appropriate HR Director.
- The allegation will be reviewed by the appropriate Director of Research and a representative from the Research Ethics Committee with additional members as appropriate.
- At least one of the panel should be from outside the University.
- Membership of the Group will be disclosed to the witness. The RMRG will be able to draw on the advice of subject matter experts. The identity of the experts will not be disclosed to the witness, but their statements will be shared anonymously with the witness who may comment. The RMRG will review all material available to it and will be able to interview the witness. Should there be a conflict of interest the witness may request a different Director of Research or Ethics representative. The University may at any stage seek legal or other professional advice on any aspect of the proceedings.
- The RMRG will prepare a written report of their findings including a recommended course of action for the Pro-VC, Research and Innovation (refer to Section D for next steps)
- If the matter is not resolved, or if the candidate remains dissatisfied with the outcome, he or she may submit a complaint to the external complaints regulator for the UK higher education sector.

## **B. Scope and Definitions**

**Research:** Research includes all original investigations to gain knowledge and understanding including that related to commerce, industry, the public, and voluntary sectors, as well as the invention and generation of ideas, images, performances, artefacts including design, where these lead to new or substantially improved insights; and the use of existing knowledge in experimental development to produce new or substantially improved materials, devices, products and processes,

including design and construction. Research includes research in natural sciences, mathematics, life sciences, engineering, behavioural and social sciences, and humanities.

**Research record:** The record of data or results that embody the facts and observations arising through the study of the subject, and includes but is not limited to research proposals, laboratory and study records both physical and electronic, artefacts, images and models, progress reports, abstracts, theses, oral presentations, internal reports and official publications.

**Research misconduct** (from The OECD Consensus Report on Scientific Integrity): fabrication, falsification, or plagiarism in proposing, performing, or reviewing research, or in reporting research results.

- Fabrication is making up results and recording or reporting them.
- Falsification is manipulating research, materials, equipment, or processes, or changing or omitting data or results such that the research is not accurately represented in the research record.
- Plagiarism is the appropriation of another person's ideas, processes, results, or words without giving appropriate credit, including those obtained through confidential review of others' research proposals and manuscripts.
- Research misconduct does not include honest error or honest differences of opinions.

**Minimum level of intent:** The minimum level of intent required for a case of research misconduct is that of gross negligence or recklessness in carrying out the research protocol.

**Burden of proof for both the act and intent:** A preponderance of the evidence constitutes a burden of proof.

## C. Allegation Evaluation

In gathering information relevant to the case, the Research and Innovation Office will undertake:

- Assessment of the allegation for:
  - The seriousness of the matter;
  - Whether other authorities should be notified;
  - The nature of the matter (is it included within a definition of misconduct or a questionable research practice); and
  - Whether there is sufficient evidence to support an inquiry or investigation.

The RMRG will undertake:

- Inquiry and investigation in order to determine if research misconduct was committed. This assessment will be based on an established burden of proof (preponderance of evidence)
  - Act: Establish if there is substance to the allegation. Any subsequent investigation will determine how serious the action was, to respond to the question: Is the act sufficiently serious in scope, impact (on public, research record), or effect to be considered research misconduct?
  - Intent: Evaluate the evidence to assess the level of intent with which the act was committed and determine if that level meets the minimum threshold for a finding of research misconduct.
  - Burden of Proof: Determine if both the assessments of the act and the intent meet the agreed minimum burden of proof for a finding of research misconduct.

The Research and Innovation Office will collect as much relevant information as reasonably possible. This may require rapid action to secure information, including information from those against whom the allegations are made.

If, on the advice of the RMRG, there are grounds for the temporary suspension of the individual(s), the matter will be referred to the relevant HR manager.

The RMRG will also determine if there is a pattern of behaviour.

#### **D. Procedure for investigations and timeframes**

- Investigative phases include:
  - Receipt and initial evaluation of allegation plus screening inquiry (by Research and Innovation Office, within two weeks of receipt)
  - Detailed Investigation to commence (by RMRG within three weeks of instruction from Research and Innovation Office)
- Adjudicative phase - ensure that actions and/or sanctions are proportionate to the offence, consistent between cases, proportionate against individuals no matter their country of origin or employer. This phase includes:
  - Option for adjudication/formal disciplinary hearing (HR – led)
  - Appeals may be heard on the basis of the submission of new evidence or identification of significant procedural errors (Members of Senate) **Reporting**

Information will be provided to all relevant parties including those defined or identified in any collaborative agreement, for example funders, national offices, institutions or other interested organizations will be informed as soon as possible.

The Research and Innovation Office will establish a central data file and make all data plus its original assessment available to the RMRG.

Following its detailed review, the RMRG will be expected to provide a report for the Pro-VC, Research and Innovation, summarising its findings and recommendations backed by evidence, e.g. no further action, no intended misconduct but remedial action required; misconduct case upheld, report provided to appropriate organisations (institutions, funding bodies, societies, journals), case referred to HR and line management.

Research misconduct committed by staff members is a disciplinary offence and disciplinary sanctions can range from a formal warning to dismissal. For students, penalties may include resubmission of work, suspension from the University for a period of time, withdrawal of degree or withdrawal from the University. Frivolous, mischievous or malicious accusations of misconduct by members of the University's staff and/or students will also constitute a disciplinary offence.

Where applicable, notification of misconduct will be made to the appropriate authorities/funders. Steps may also need to be taken to correct the research record.

The report will be made available to the Pro-VC, Research and Innovation, the witness and the line manager. A copy will be kept on file within the Research and Innovation Office.

The University's Research Ethics Committee, CUREC will receive a summary of any cases following completion of an investigation.

A top level statement on any research misconduct investigation will be given to the University's governing body and will be published as part of the Annual Statement on Research Integrity, making

it available to the general public via the University website in line with the requirements of the Concordat to Support Research Integrity. The statement will not include individual's details in order to maintain confidentiality in line with GDPR.

## Document control

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## Document Review

Version	Amendment	By	Date
V2	Updated in line with new branding.	RIO	23.11.16
V3	Typographical changes  Page 3 – student academic misconduct will be dealt with in the same way as academic misconduct with allegation reported to the Research and Innovation Office  Page 4, new heading to clarify procedure for staff academic misconduct section.	RIO	5.12.17
V4	Investigation management – updated to state that at least one member of the Research Misconduct Review Group should be from outside the University.  Weblinks updated.	RIO	22.2.19
V5	Updated in line with the revised Concordat to Support Research Integrity. Changed from Policy to Process (CU-RIO-PROC-4.0)	RIO	3.2.20
V6	Document control updated with details of new PVC R&I	RIO	27.1.22