# Template: annual statement on research integrity

If you have any questions about this template, please contact: [RIsecretariat@universitiesuk.ac.uk](mailto:RIsecretariat@universitiesuk.ac.uk).

## Section 1: Key contact information

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| Question | Response |
| 1A. Name of organisation | Imperial College London |
| 1B. Type of organisation:  higher education institution/industry/independent research performing organisation/other (please state) | Higher Education Institution |
| 1C. Date statement approved by governing body (DD/MM/YY) | 12 May 2023 |
| 1D. Web address of organisation’s research integrity page (if applicable) | <https://www.imperial.ac.uk/research-and-innovation/about-imperial-research/research-integrity/> |
| 1E. Named senior member of staff to oversee research integrity | Name:  Professor Mary Ryan, Vice Provost (Research and Enterprise) |
| Email address: [m.ryan@imperial.ac.uk](mailto:m.ryan@imperial.ac.uk) |
| 1F. Named member of staff who will act as a first point of contact for anyone wanting more information on matters of research integrity | Name:  Jonathan Hancock, Research Integrity Officer |
| Email address: [Jonathan.hancock@imperial.ac.uk](mailto:Jonathan.hancock@imperial.ac.uk) |

## Section 2: Promoting high standards of research integrity and positive research culture. Description of actions and activities undertaken

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| 2A. Description of current systems and culture  Please describe how the organisation maintains high standards of research integrity and promotes positive research culture. It should include information on the support provided to researchers to understand standards, values and behaviours, such as training, support and guidance for researchers at different career stages/ disciplines. You may find it helpful to consider the following broad headings:   * Policies and systems * Communications and engagement * Culture, development and leadership * Monitoring and reporting |
| Imperial College London is committed to undertaking research of the highest international quality within an intellectually challenging and inspiring environment, to extending the frontiers of research within and beyond existing research disciplines, and to bringing together research expertise within and beyond the College to address the science challenges of today and the future. Maintaining the highest standards of research governance and integrity are essential to the College's reputation and success.  The College's reputation and success in research are underpinned both by the quality and expertise of the individuals within the College, and by the standards of research governance and integrity that the College expects all researchers to meet. To this end, the College has adopted the Council for Science and Technology's Universal Ethical Code for Scientists and upholds its three principles, which are: Rigour, Honesty and Integrity; Respect for Life, the Law and the Public Good; and Responsible Communications: Listening and Informing.  The Vice-Provost (Research and Enterprise), Professor Mary Ryan, has leadership oversight for the research environment, including Ethics and Integrity. The Research Office’s responsibilities now also encompass an Ethics and Integrity function. Additional information and guidance on research integrity is also made available on the College website.  All College staff are required to complete Imperial Essentials training within 6 months of joining the College. This comprises 6 key compliance courses, including data protection, equality, diversity and inclusion, fire safety, information security, safety training and safeguarding. The College also provides a variety of training opportunities and guidance for its researchers, including a new Research Integrity & Ethics at Imperial College e-learning course, as well as other training programmes covering health and safety, academic supervision, intellectual property, the responsible conduct of animal research, data protection, plagiarism awareness etc.  In addition to these online resources and training opportunities, new fellows and clinicians are provided with a specific induction programme which includes an introduction to research integrity at the College. To embed a culture of ethics and integrity throughout the College the Research Governance and Integrity team also delivers training courses on research transparency, NHS research ethics and Imperial College Research ethics. Yearly training on ethical review has also been implemented for all College and Lay members of the Imperial College Research Ethics Committees.  The Postdoc and Fellows Development Centre (PFDC) has also been providing support for research staff at Imperial since 2009. The PFDC offers an extensive programme of professional skills and career development training, support, and opportunities, which enable research staff to succeed in their current position, while planning their next steps.  As well as providing training and support for research staff at the College, advice and guidance on research integrity is also provided for postgraduate research students by the College’s Graduate School. Its online plagiarism course is compulsory for all 1st year Doctoral students and must be completed before the 9-month Early Stage Assessment. A similar mandatory course is also provided for Masters level students.  The Graduate School has also developed a Supervisors’ Guide, which is available online, and also as a printable handbook. The guide sets out the College's requirements for the continuing professional development of supervisors, and contains information about the recruitment of research degree students, the roles and responsibilities of supervisors and Imperial's research degree milestones. The guide is also intended to support the effective development of student supervisor partnerships, a key part of the effective development of future researchers. |

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| 2B. Changes and developments during the period under review  Please provide an update on any changes made during the period, such as new initiatives, training, developments, also ongoing changes that are still underway. Drawing on Commitment 3 of the Concordat, please note any new or revised policies, practices and procedures to support researchers; training on research ethics and research integrity; training and mentoring opportunities to support the development of researchers’ skills throughout their careers. |
| In order to meet the Concordat’s enhanced training requirements for researchers, a new Research Integrity & Ethics at Imperial College - e-learning course has been created by the College’s Research Governance and Integrity team. This new course was made available for staff online in 2021. Although aimed primarily at new staff and younger researchers, the course is available for all researchers at the College.  In addition to the College’s in-house provision, the UK Research Integrity Office (UKRIO) is developing a general online research integrity training course that will be offered to its subscribers, including the College. Once this has been made available, the College will consider how this, and the other training programmes offered by UKRIO, might be able to complement the College’s own in-house training provision. |

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| 2C. Reflections on progress and plans for future developments  This should include a reflection on the previous year’s activity including a review of progress and impact of initiatives if known relating to activities referenced in the previous year’s statement. Note any issues that have hindered progress, e.g. resourcing or other issues. |
| In April 2022 the UKRIO began a consultation on draft revisions to its model procedures for the investigation of misconduct in research. These revisions were the result of a comprehensive review of its model procedures which were first published in 2008. The revised procedures are designed to meet the requirements set out in the updated UK Concordat to support research integrity as well as taking account of best practice across the UK research sector. The fully revised model procedures were published by UKRIO in March 2023.  The College’s own research misconduct procedures are currently being reviewed to take account of both the new model procedures published by UKRIO and the College’s own experiences in operating its procedures. A key aim of these revisions is to simplify and clarify the procedures and also to make them more accessible to all College members. It is also proposed to simplify the process by which concerns can be raised, and make this more accessible, and to provide additional guidance on the operation of the procedures. Once this process is complete, the revised procedures will be brought forward for approval. |

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| 2D. Case study on good practice (optional)  Please describe an anonymised brief, exemplar case study that can be shared as good practice with other organisations. A wide range of case studies are valuable, including small, local implementations. Case studies may also include the impact of implementations or lessons learned. |
| *[Please insert response]* |

## Section 3: Addressing research misconduct

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| 3A. Statement on processes that the organisation has in place for dealing with allegations of misconduct  Please provide:   * a brief summary of relevant organisation policies/ processes (e.g. research misconduct procedure, whistle-blowing policy, bullying/harassment policy; appointment of a third party to act as confidential liaison for persons wishing to raise concerns) and brief information on the periodic review of research misconduct processes (e.g. date of last review; any major changes during the period under review; date when processes will next be reviewed). * information on how the organisation creates and embeds a research environment in which all staff, researchers and students feel comfortable to report instances of misconduct (e.g. code of practice for research, whistle-blowing, research misconduct procedure, informal liaison process, website signposting for reporting systems, training, mentoring, reflection and evaluation of policies, practices and procedures). * anonymised key lessons learned from any investigations into allegations of misconduct which either identified opportunities for improvements in the organisation’s investigation procedure and/or related policies / processes/ culture or which showed that they were working well. |
| The College has a number of policies and processes which allow staff, students and other College members to raise concerns or make complaints. Concerns or allegations about bullying, harassment, discrimination and sexual misconduct can be reported using the College’s Report and Support tool. The Report and Support tool can be used by anyone, including staff, students, contractors and visitors to the College and reports can be made by people who have witnessed an incident, or who have experienced bullying or harassment directly. The Report and Support tool complements the College’s existing grievance and disciplinary procedures.  Students can raise concerns using the College’s Student Complaints Procedure. Health and Safety concerns and incident reports are reported using the College’s online Safety reporting tool (SALUS). The College also has a whistleblowing policy and procedure ([Ordinance D18](https://www.imperial.ac.uk/media/imperial-college/administration-and-support-services/secretariat/public/college-governance/charters-statutes-ordinances-regulations/ordinances/Ordinance-D18.pdf)) which can be used to make public interest disclosures.  All of these processes and procedures are available online together with advice and guidance on their operation. Issues concerning research integrity or research misconduct are usually reported using the College research misconduct procedures. However, if concerns are raised as part of a complaint using these other tools, that aspect of the complaint will usually be referred for consideration under the research misconduct procedures. Concerns or allegations about research misconduct may be raised by anyone in the College or by people or organisations outside the College.  Allegations of research misconduct are considered under [Ordinance D17, the Investigation of Allegations of Research Misconduct](https://www.imperial.ac.uk/media/imperial-college/administration-and-support-services/secretariat/public/college-governance/charters-statutes-ordinances-regulations/ordinances/Ordinance-D17-Nov-2020.pdf), which aligns closely with the requirements of the Concordat and with the UK Research Integrity Office’s model procedures for the investigation of misconduct in research.  Under these procedures, allegations of research misconduct are made in confidence to the College Secretary and General Counsel, as Chair of the College’s Research Misconduct Response Group (RMRG). The other members of the RMRG are the Vice-Provost (Research and Enterprise), the Director of the Research Office and the Director of HR. If the RMRG agree that an allegation meets the definition of research misconduct, it will arrange for a screening investigation to be conducted. There are normally three possible outcomes from a screening investigation: a) that a prima facie case has not been established, in which case the allegations will normally be dismissed; b) if the screening investigation determines that there is some substance to the allegations, but it is judged that they are minor or there is lack of intention to deceive then the allegation may be dealt with through informal resolution; or c) that there is a prima facie case for further investigation. In such cases, a full investigation will then be conducted by an investigation panel, which must include an independent, external member. The full investigation will determine whether the allegations are proven, based on the balance of probabilities. Where an allegation is upheld, it will usually be referred to a disciplinary panel to determine the appropriate penalty to apply. The outcome of all cases that are referred for full investigation are reported to the Council and included in the annual statement on research integrity.  The College recognises that research misconduct investigations are challenging; the investigation must be rigorous, but also fair to both the complainant and respondent. Investigations of potential research misconduct are stressful for all who are involved in them, either as accuser or accused. The College provides pastoral support for all those involved throughout the process, including access to support and advice as well as confidential counselling services. Where an individual who has been accused of research misconduct is exonerated after investigation, the College will also take reasonable steps to help the researcher maintain their reputation and assist them in resuming any research temporarily put on hold.  In 2021-22 the College received ten allegations of research misconduct. Although this represents a reduction in the number of complaints received when compared to 2020-21 it is still higher than average. Two cases were referred for full investigation during the year.  Half the cases considered during the year concerned the manipulation or duplication of data in research papers or in student work. These allegations can arise at any time and can often be made several years after publication. Allegations concerning historic work or older papers are often made anonymously on websites such as PubPeer. In 2021-22 five allegations of data manipulation or fabrication were investigated as a result either of comments made online, or as a result of allegations received directly by the College.  Disputes over the inclusion or exclusion of researchers as listed co-authors on papers continue to result in a number of allegations each year. In order to avoid authorship disputes, departments and principal investigators are encouraged to confirm at the outset that only those researchers who have made a significant intellectual or practical contribution to the work should be listed as a co-author, and that all authors should abide by the College’s authorship guidelines.  Recommendations and lessons learnt from screening and full investigations may be promulgated more widely to aid good practice, even in those cases where the original allegations were dismissed or where the case was resolved informally. In 2022 the College investigated an allegation of a potential breach of confidentiality in the peer review process. Although the allegation of research misconduct was eventually dismissed, following this case the RMRG encouraged all departments to discuss research misconduct at academic staff meetings to enable better awareness of the subject and specifically the requirements of the peer review process, in particular amongst more junior researchers with limited reviewing experience. |

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| 3B. Information on investigations of research misconduct that have been undertaken  Please complete the table on the number of formal investigations completed during the period under review (including investigations which completed during this period but started in a previous academic year). Information from ongoing investigations should not be submitted.  An organisation’s procedure may include an initial, preliminary, or screening stage to determine whether a formal investigation needs to be completed. These allegations should be included in the first column but only those that proceeded past this stage, to formal investigations, should be included in the second column. | | | | |
| Type of allegation | Number of allegations | | | |
| Number of allegations reported to the organisation | Number of formal investigations | Number upheld in part after formal investigation | Number upheld in full after formal investigation |
| Fabrication | 1 | 1 |  | 1 |
| Falsification | 4 |  |  |  |
| Plagiarism | 4 | 1 |  |  |
| Failure to meet legal, ethical and professional obligations | 1 |  |  |  |
| Misrepresentation (eg data; involvement; interests; qualification; and/or publication history) |  |  |  |  |
| Improper dealing with allegations of misconduct |  |  |  |  |
| Multiple areas of concern (when received in a single allegation) |  |  |  |  |
| *Other\** |  |  |  |  |
| Total: | 10 | 2 |  | 1 |
| \*If you listed any allegations under the ‘Other’ category, please give a brief, high-level summary of their type here. Do not give any identifying or confidential information when responding. | | | | |
| In late 2021 the College received an allegation from a former student that her supervisor had submitted her MSc thesis for publication without permission or authorisation. It was alleged that the supervisor had submitted a paper for publication a year after the student had left the College that was substantially based on her thesis without consulting with or informing the student. Although the former student was included as a co-author on the paper, it also included three new co-authors, including the proposed first author, who were previously unknown to the student and who had made little or no contribution to her work or thesis. The case was referred for full investigation after an initial screening investigation. Although the Panel upheld the majority of the allegations it determined that there was no evidence of deliberate misconduct on the supervisor’s part and agreed there had been no intention to deceive as the student had been included as a co-author on the paper. Although the Panel determined that deliberate research misconduct was not proven, it identified several failings in the supervisor’s publication practices and recommended a number of actions to address these failings and to prevent any recurrence of the issues identified.  In 2022 a PhD student was found to have submitted a substantial amount of fabricated data and results for both his first-year ESA (Early-Stage Assessment) progression assessment in 2020 and his second-year progression assessment in 2021. During the screening investigation the student admitted all the allegations and confirmed that the majority of results he had submitted for both assessments had been completely fabricated. As research misconduct was admitted there was no need to conduct a full investigation and the case was then referred to a separate Panel to determine the appropriate penalty to be applied. Given the seriousness of the offence, the extent of the fabricated data submitted by the student, and the repeated offending in two separate years with clear intent to deceive, the Panel agreed unanimously that the student should be expelled from his PhD studies and from the College. | | | | |