Template: annual statement on research integrity

If you have any questions about this template, please contact: RIsecretariat@universitiesuk.ac.uk.

Section 1: Key contact information

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)	10/05/24
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
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: Jon Hancock, Research Integrity Officer
	Email address: jonathan.hancock@imperial.ac.uk

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

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 university to address the science challenges of today and the future. Maintaining the highest standards of research governance and integrity are essential to the university's reputation and success.

Imperial's reputation and success in research are underpinned both by the quality and expertise of the individuals within the university, and by the standards of research governance and integrity that the university expects all researchers to meet. To this end, Imperial 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.

Integrity is central to the Imperial's Core Values and Behaviours, and is identified as one of the five Core Values, along with Respect, Collaboration, Excellence and Innovation, all of which are central to the way the university and its researchers carry out research. Imperial's Ethics Code also makes it clear that integrity is the guiding

principle of the Code, and that every member of the university is expected to abide by the Code. It goes on to state that those members of the university *"involved in research should conduct their research responsibly and in accordance with the College's policies and procedures relating to research ethics."*

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 also include an Ethics and Integrity function. Additional information and guidance on research integrity is also made available on Imperial's website. This includes advice on good practice in research integrity, research governance, research misconduct, conflicts of interest, authorship, ethics approval, the use of animals in research and open access to research. The Research Integrity pages also provides links to the Concordat to Support Research Integrity and the Universal Ethical Code for Scientists.

All university staff are required to complete Imperial Essentials training within 6 months of joining Imperial. This comprises 6 key compliance courses, including data protection, equality, diversity and inclusion, fire safety, information security, safety training and safeguarding. Imperial also provides a variety of training opportunities and guidance for its researchers, including a 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 Imperial. To embed a culture of ethics and integrity throughout the University 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 university 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 university, advice and guidance on research integrity is also provided for postgraduate research students by Imperial'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 produced a Supervisors' Guide, which is available online, and also as a printable handbook. The guide sets out Imperial'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.

Since 2021-22, Imperial has secured over £3m from Research England's Enhancing Research Culture funding to invest in developing its research culture defined by a culture of integrity, good governance and best practice. This funding is managed by the Vice-Provost (Research and Enterprise) Office and the Funding Strategy team (Research Office), and it has been used to support both cross-university and department-led projects. Imperial's initial priority was to pump prime scoping projects, but as the funding has continued the focus has shifted to providing ongoing support to those projects that have shown the most potential to allow them to embed within the university. Areas for investment have included:

- Improving access to and participation in research, including postgraduate research study, for people from currently underrepresented groups;

- Furthering open research practices;

- Improving research conduct and reproducibility;

- Tackling bullying and harassment;

- Improving research leadership skills across all career stages;

- Creating routes for collaboration and exchange with businesses, third sector organisations and government;

- Securing and supporting the careers of researchers and associated professions;

- Diversifying recruitment, reward and recognition approaches at all career stages;

- Delivering new approaches to public dialogue and community-led research.

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 was created by Imperial's Research Governance and Integrity team. This 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 University.

In addition to Imperial's in-house provision, the UK Research Integrity Office (UKRIO) has developed an online research integrity training course that is currently being piloted. Once this has been made more widely available, Imperial will consider how this, and the other training programmes offered by UKRIO, might be able to complement the university's own in-house training provision.

In the period under review Imperial undertook a review of its overarching Ethics Code. Proposed changes to the Ethics Code include more explicit references to research ethics and integrity. The revised and updated Ethics Code will be introduced in 2024.

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 March 2023 the UKRIO published its revised model procedures for the investigation of misconduct in research. 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.

In the period under review Imperial began a review of its own research misconduct procedures (which were last updated and reviewed in 2020) to take account of both

the new model procedures published by UKRIO and the university'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 university 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. It is expected that the revised procedures will be brought forward for approval in 2024.

In 2023 Imperial secured £1m from Research England's Enhancing Research Culture funding to invest in developing its research culture, defined by a culture of integrity, good governance and best practice. This funding has been allocated to deliver a programme of activities aiming to improve quality and reliability, which supports a positive research culture through systemic changes to the conduct and communication of research at Imperial. Four work programmes will:

a) Identify the issues and factors that matter in the development of a collaborative, generalisable workflow for data transparency and scrutiny, particularly as applicable to models and AI;

b) Identify the practices and behaviours that matter in the development of a positive research culture that emphasises the public interest in high-quality research;

c) Run a second phase of the University's Research Software Champions pilot; and,

d) Start to build an Open Research community of practice, supporting motivated individuals that will take ownership of Imperial's research culture.

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

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.

Imperial College London has a number of policies and processes which allow staff, students and other university members to raise concerns or make complaints. Concerns or allegations about bullying, harassment, discrimination and sexual misconduct can be reported using Imperial's Report and Support tool. The Report and Support tool can be used by anyone, including staff, students, contractors and visitors to the university 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 Imperial's existing grievance and disciplinary procedures.

Students can raise concerns using Imperial's Student Complaints Procedure. Health and Safety concerns and incident reports are reported using the university's online Safety reporting tool (SALUS). Imperial also has a 'whistleblowing' policy and procedure 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 to Vice-Provost (Research and Innovation), the University Secretary or the Research Integrity Officer citing the university 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 university or by people or organisations outside Imperial.

Allegations of research misconduct are considered under the Research Misconduct Procedures (currently Annex K to the Appendix to the Ordinances). These align 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 University Secretary, as Chair of Imperial's Research Misconduct Response Group (RMRG) (although as noted above, in practice allegations are also often sent to the Vice-Provost (Research and Enterprise) or the Research Integrity Officer). 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) If there is no substance to the concerns that have been raised, 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 the allegations appear to be well-founded and there is therefore a 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 University 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.

Imperial 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. Imperial 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 university will also take reasonable steps to help the researcher maintain their reputation and assist them in resuming any research temporarily put on hold.

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 university investigated an allegation of a potential plagiarism in a published paper. Although the Investigation Panel determined that there was no evidence of deliberate misconduct in this case, one of the recommendations arising from the investigation was that Imperial's online authorship guidelines should be updated and extended to provide more detailed guidance for researchers. In addition to the provision of this additional online guidance, wider authorship issues have also been raised and discussed with Faculty research committees.

In 2022-23 Imperial received four allegations of research misconduct. This is lower than the average number of cases usually considered by the university. Two cases were referred for full investigation during the year with one of these cases still to be concluded. Allegations continue to cover a range of issues, including data manipulation in published papers (including in some cases papers that were published many years previously), plagiarism in papers and sometimes in PhD theses, and authorship disputes.

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			
Falsification				
Plagiarism				
Failure to meet legal, ethical and professional obligations	2			
Misrepresentation (eg data; involvement; interests; qualification; and/or publication history)	1	1	1	
Improper dealing with allegations of misconduct				
Multiple areas of concern (when received in a single allegation)				
Other*				
Total:	**4**	**1**	**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 2023 a PhD student's supervisors reported that the student had published a large number of papers covering a very wide range of topics outside of the main subject area of his PhD without their knowledge or permission. There were concerns about the quality of some of the published papers and it was also alleged that the student had misrepresented his institutional affiliations in several of the papers. The screening investigation upheld four of the specific concerns that had been raised and recommended that these issues should be investigated further. Five other issues that had been identified both before and during the investigation were either dismissed or were resolved informally. The student agreed to accept full responsibility for his actions, thus negating the need for a formal investigation, and apologised to his supervisors and his department and agreed to undertake further training in research integrity and in future to comply with Imperial's exacting research standards.