## CONTENTS

<table>
<thead>
<tr>
<th>Section</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>Introduction</td>
<td>3</td>
</tr>
<tr>
<td>Compliance with the 2019 Concordat to Support Research Integrity</td>
<td>3</td>
</tr>
<tr>
<td>Internal Audit and Review</td>
<td>3</td>
</tr>
<tr>
<td>Principles and Standards</td>
<td>3</td>
</tr>
<tr>
<td>Procedures for Dealing with Research Malpractice</td>
<td>3</td>
</tr>
<tr>
<td>Research Ethics</td>
<td>4</td>
</tr>
<tr>
<td>Activities to Support the Understanding and Application of Research Integrity Principles</td>
<td>4</td>
</tr>
<tr>
<td>Strategic Commitment</td>
<td>4</td>
</tr>
<tr>
<td>Accessibility and currency of information</td>
<td>5</td>
</tr>
<tr>
<td>Training</td>
<td>5</td>
</tr>
<tr>
<td>Research Integrity Induction</td>
<td>6</td>
</tr>
<tr>
<td>Faculty Research Culture</td>
<td>6</td>
</tr>
<tr>
<td>Formal Investigations of Allegations of Misconduct – Lessons Learned</td>
<td>6</td>
</tr>
<tr>
<td>Formal Investigations of Allegations of Misconduct – 2020-21</td>
<td>7</td>
</tr>
<tr>
<td>Commitment to the Concordat to Support Research Integrity</td>
<td>7</td>
</tr>
</tbody>
</table>
INTRODUCTION

1 This annual statement is provided in order to reassure the Council that the University continues its commitment to embedding a transparent and supportive research environment according to the principles enshrined in the Concordat to Support Research Integrity (2019).

COMPLIANCE WITH THE 2019 CONCORDAT TO SUPPORT RESEARCH INTEGRITY

Internal Audit and Review

2 In November 2020 the Research Committee mapped the University’s research integrity framework against the Concordat to Support Research Integrity and concluded that the University is largely compliant with the principles within the Concordat, however noted that there were some areas where provision might be enhanced and agreed an action plan. This finding was confirmed by an Internal Audit of research integrity, reporting in March 2021, which concluded 'Research Enterprise and Scholarship (RES) and Faculties manage the risks associated with Research Integrity across the University ensuring that it is compliant with the aims of the Concordat, University governance, policy and due processes are in place and adhered to. There is a well maintained, user friendly website available to all staff and students which contains a ‘one stop shop’ for anything that is related to Research Integrity and Research Ethics [...]'. RES conducted an internal evaluation of compliance against the Concordat and concluded that the University was basically compliant and has already begun to take the necessary steps to further strengthen policies and processes across research.'

Principles and Standards

3 The University published a substantially revised ‘Research Code of Practice’ in July 2021, to fully align with the Concordat and other external and internal policy developments. For example, the revised Code includes some practical pointers to researchers about how to ensure their research aligns with equality, diversity and inclusion principles.

Procedures for Dealing with Research Malpractice

4 The University’s ‘Procedure for Dealing with Allegations of Research Malpractice or Misconduct’ complies with the requirements of the Concordat and is compatible with the UK Research Integrity Office ‘Procedure for the Investigation of Misconduct in Research’ (2008). The University has developed a ‘Postgraduate Research Student Plagiarism and Research Misconduct Policy’ which sets out definitions, training expectations, investigation procedures and proportionate academic penalties tailored for such researchers. The University plans to update the ‘Procedure for Dealing with Allegations of Research Malpractice or

---

1 https://www.universitiesuk.ac.uk/topics/research-and-innovation/concordat-research-integrity
2 Open University Internal Audit report ref 2320
3 All Open University research policies https://www.open.ac.uk/research/governance/policies
Misconduct’ as soon as the UK Research Integrity Office publishes the long-anticipated revision of its guidance in this area.

Research Ethics

5 The Human Research Ethics Committee and the Animal Welfare Ethical Review Body continue to review research projects involving humans and non-human animals and provide advice to researchers on conducting research according to the highest ethical standards. The Human Research Ethics Committee has experienced a year-on-year increase in the total number of ethics review checklists and applications over the last three years, with a 58% increase in 2020-21. In response to the Research Committee’s Research Integrity Action Plan, and a recommendation arising from the Internal Audit to maintain quality standards, support the integrity of human research ethics review, and align with practice across the sector, the University is seeking to procure an IT system to support human research ethics review.

6 The University published an ‘Ethical Research Statement’ in November 2020. Certain research collaborations, funders, or research projects /activities can pose ethical or reputational risks for the University that go beyond the ethics of human participant research and research with non-human animals. A new committee, the Ethical Research Review Body, has been approved that will oversee ethics review of these aspects of research activity, as well as providing a mechanism for institutional approval of terrorism and extremism-related research projects.

ACTIVITIES TO SUPPORT THE UNDERSTANDING AND APPLICATION OF RESEARCH INTEGRITY PRINCIPLES

Strategic Commitment

7 In response to the Research Committee’s Research Integrity Action Plan and a recommendation arising from the Internal Audit, the University is ensuring that an explicit commitment to nurturing a research environment that develops good research practice and is based on the principles of research integrity is enshrined in the revised Open University strategy 2022-2027, the emergent Research Plan, as well as in relevant unit research strategies and business plans.

8 On behalf of the University, in November 2020, the Vice-Chancellor signed commitments to the San Francisco Declaration on Research Assessment (DORA)\(^4\) and the revised Concordat to Support the Career Development of Researchers (2019)\(^5\). The former commits the University to taking a holistic approach to assessing research quality, making responsible and equitable use of research performance metrics only where appropriate to complement other evidence, in recruitment, retention, reward, promotion and training. The latter aims to create an open, supportive and inclusive environment where researchers have greater employment security and are well trained. The University is developing action plans for full alignment. These are significant commitments aimed at mitigating systemic pressures that disincentivise good research conduct and practice.

---

\(^4\) [https://sfdora.org/](https://sfdora.org/)

\(^5\) [https://www.vitae.ac.uk/policy/concordat](https://www.vitae.ac.uk/policy/concordat)
Accessibility and currency of information

9 Aligning with the Concordat’s third commitment of ‘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 researcher’, the University continued to ensure that information about the University’s research integrity / research policy framework was available to its research community and external stakeholders on The Open University research website. The website includes named officers for overseeing research integrity and whistleblowing, the ‘Annual Statement on Research Integrity’, the ‘Research Code of Practice’, the ‘Procedure for dealing with Allegations of Research Malpractice or Misconduct’, and the associated procedure for postgraduate research students (PGRs), all research policies, ethics principles and review procedures, and details of the formal research governance structure.

10 In addition to the policy developments outlined in paragraphs 3, 4, and 6 above, the ‘Terrorism and Extremism-related Research Policy’ was revised for compliance with new counter-terrorism legislation.

11 The University has published revised guidance and processes to support researchers conducting human research in the context of Covid-19, to ensure ongoing duty of care to researchers and research participants and proportionate risk mitigation against a backdrop of variable and changing four nations government guidance on Covid-19.

Training

12 Supervisors are responsible for ensuring that postgraduate research students (PGRs) are made aware of the research integrity and ethics expectations at the beginning and throughout their registration. This responsibility is reinforced in supervisor training offered through the Research Career Development Programme. Research integrity and ethics briefings, and avoidance of plagiarism training are delivered to PGRs through the Graduate School training programme. On-line training modules on Professional Conduct (including ethics, plagiarism avoidance, diversity), are available through the Graduate School Network.

13 Training on the principles of research integrity, and research ethics workshops are delivered to staff and PGRs as part of the University’s Research Career Development Programme. The Library provides training and support with open access research, research data management and copyright. Research and Enterprise provides training in intellectual property and other relevant topics. Training in discipline specific good research practice is the responsibility of Faculties.

6 https://www.open.ac.uk/research/governance
7 https://www.open.ac.uk/research/governance/ethics/human/review-process/conducting-human-research-during-covid-19
8 Code of Practice for supervisors and research students (Research Degree regulations appendix 2 https://help.open.ac.uk/documents/policies/research-degree-regulations/files/7/research-degree-regulations.pdf)
9 http://www.open.ac.uk/students/research/activities/lists/professional-conduct?page=1
10 http://www.open.ac.uk/library-research-support/
11 https://openuniv.sharepoint.com/sites/intranet-research-academic-strategy/Pages/research-and-enterprise-events.aspx (intranet)
Research Integrity Induction

14 The University expects all new academic and research staff, research support staff and postgraduate research students to receive a briefing about research integrity at induction. This expectation is published in the ‘Research Code of Practice’ and on The Open University Research website. Induction is devolved to Faculties to implement and to monitor. The ‘Faculty Research Induction Checklist’ is available on the Research website to assist. Whilst the annual audit of research integrity demonstrates that all Faculties take this requirement seriously, only one Faculty has a mechanism in place to ensure that research integrity induction reaches all relevant individuals. Over the forthcoming period the University will investigate the possibility of introducing a mandatory, on-line research integrity and ethics training module to enhance reach, consistency of messaging, and monitoring.

Faculty research culture

15 The 2020 Vitae report, ‘Research Integrity: A Landscape Study,’ concluded that local research culture is a highly significant influence for practicing research integrity, overriding national and even institutional policies. Therefore, Research Committee asked Faculties and units to provide a more detailed annual report about the steps they are taking to nurture a local research environment that develops good research practice and is based on the principles of research integrity. This requirement to report facilitates quality assurance and transparency. It also helps Faculties to identify their good practice and any areas where they might enhance research culture. The report is a mechanism for sharing good practice.

16 Reports show that Faculties have, or are in the process of ensuring, an explicit commitment to research integrity is in Faculty strategies and plans, that research integrity pages on their intranet sites are revised to include expectations for research conduct and names of local officers with whom concerns about research conduct can be raised. Over the forthcoming period, where Faculties have not already done so, they are encouraged to also publish names of individuals who can provide advice on good research practice.

17 Reports demonstrated that Faculties reinforce and monitor good research practice and research integrity compliance variously through research communications, local research integrity training and events, Career Development and Staff Appraisal, other research meetings, and internal risk assessment and peer review of externally funded, and in some cases internally-funded research, additional to the pre- and post- award support provided by the central Research and Enterprise Team. Over the forthcoming period the University will encourage Faculties to ensure that proportionate risk assessment and peer review is extended to include all internally funded research.

FORMAL INVESTIGATIONS OF ALLEGATIONS OF MISCONDUCT – LESSONS LEARNED

18 The organisational and procedural recommendations arising from the formal investigation which was reported in the previous Annual Research Integrity Statement have been addressed.

19 (1) The University’s requirements for PGRs undertaking fieldwork in conjunction with third party collaborators has been clarified and included in the revised Research Code of Practice.

12 ‘Research Integrity: A Landscape Study’ (2020), Vitae UKRI-020920-ResearchIntegrityLandscapeStudy.pdf
(2) Plagiarism avoidance policy, procedures and training for PGRs and supervisors had been enhanced through the introduction of the Plagiarism and Research Misconduct Policy for PGRs which specifies that all PGRs are expected to undertake plagiarism avoidance and research integrity/ethics training prior to upgrade. Supervisors are reminded of their responsibilities in relation to supporting students to avoid plagiarism and research misconduct in supervisor training.

(3) Data archiving procedures in the relevant area have been reviewed.

(4) The Intellectual Property Research Advisory Group has reviewed and revised internal due diligence in respect of intellectual property.

FORMAL INVESTIGATIONS OF ALLEGATIONS OF MISCONDUCT – 2020-21

20 Allegations of research misconduct or malpractice are a fairly uncommon occurrence at The Open University. Where they do arise, it is sometimes the case that they are a result of misunderstanding and poor communications, which can be resolved without recourse to the formal process, to the satisfaction of all parties concerned.

21 In the academic year 2020-21, no new allegations of research misconduct were formally notified to the Pro-Vice-Chancellor, Research, Enterprise and Scholarship.

COMMITMENT TO THE CONCORDAT TO SUPPORT RESEARCH INTEGRITY

22 As demonstrated by the evidence provided in the above statement, The Open University is committed to the principles of research integrity contained in the 2019 Concordat. It promotes an open and supportive research culture in which staff, researchers and students feel comfortable to seek assistance, and to report instances of suspected misconduct. It continues to seek ways to further enhance and embed a research culture supportive of research integrity principles by annual review of progress against its Research Integrity Action Plan, and triennial review of University’s research integrity framework against the Concordat to Support Research Integrity.

Approved by Council on 1 March 2022