

RESEARCH INTEGRITY

2021-2022

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1. Preamble

LSHTM is dedicated to upholding the highest standards of research excellence and integrity, and is committed to delivering high quality, relevant research, underpinned by the highest ethical standards across the globe. LSHTM fully supports the Concordat for Research Integrity¹ and maintains the Research Governance and Integrity Office (RGIO) dedicated to research governance, ethics and integrity to assure compliance with the Concordat, as well as regulations, guidance, and standards of good practice governing research around the world.

This report provides an annual summary of actions and activities undertaken to support research integrity at LSHTM, and provides the required details from the Concordat to Support Research Integrity (Commitment 5).

This report covers activities from 1 April 2021 to 31 March 2022.

2. Executive Summary

The RGIO continues to develop training, refine policies and undertake activities in Research Integrity to mitigate risks and prevent recurrence of issues related to research misconduct. A summary of actions and activities include:

- **Training.** The RGIO continues to deliver training on Ethics, Good Research Practice, Working with Human Tissue and Good Clinical Practice². A full online version of the Good Research Practice course is in development. The Head of Research Governance and Integrity (RG&I) continues to deliver half-day training following attendance at a ‘train the trainer’ programme offered by the VIR2TUE Horizon 2020 project in virtue ethics. The Head of RG&I also conducted several training sessions at both MRCU and MRCG into investigations of research misconduct.

¹ [Universities UK \(2019\) Concordat to Support Research Integrity](#)

² [RGIO online training](#)

- **UKRIO Advisory Council.** The Head of RG&I has become a member of the UK Research Integrity Office Advisory Council and regularly attends meetings and provides insights into research integrity from an HEI perspective.
- **Successful DrPH review.** The Head of RG&I continues her studies for the DrPH on Research Integrity and successfully conducted the review in July 2021.
- **MRCG Review into Research Culture.** The Research Governance Committee noted the MRCG Review that took place on research culture. The results from the report show improvements can be made regarding research integrity training and in the awareness of the processes for reporting allegations of research misconduct.
- **World Conference on Research Integrity.** The Head of RG&I had a poster accepted at the WCRI, to take place June 2022.
- **Research Audits.** The Head of RG&I leads the Quality Assurance programme for research across LSHTM, which includes undertaking audits to assure LSHTM that the research complies with all relevant legislation, standards of good practice, Standard Operating Procedures, and all applicable policies. In the period 1 May 2021 – 30 April 2022, 4 audits were undertaken which resulted in 0 critical findings, 5 major findings and 1 minor finding; these require the Chief Investigator/Principal Investigator to respond outlining their Corrective and Preventive Action (CAPA) plan which is reviewed by the Head of RG&I. A summary of the audit programme will be reviewed by RGC in October 2022.

3. Research Governance Committee

The Research Governance Committee³ (RGC) has oversight of research governance and research integrity across LSHTM. The RGC meets termly: (20 October 2021, 16 March 2022 and 25 May 2022) and provides annual reports to Senate; the latest was submitted for the 8 June 2022 meeting.

4. Policies and Procedures

4.1 Procedure for inquiring into allegations of research misconduct⁴

The amended procedure (v3.0) was reviewed by the Research Governance Committee following the publication of UKRIO's updated template procedure. Further amendments have been requested by the RGC to ensure conformance with other LSHTM policies and will be submitted for approval by Senate in October.

This procedure is kept under review to ensure that it meets the needs of the organisation, and to ensure that how LSHTM deals with allegations of misconduct are transparent, timely, robust and fair.

4.2 Good Research Practice policy⁵

The Good Research Practice policy provides the essential criteria that all LSHTM staff and students are expected to follow in the conduct of their research. Following a gap analysis and stakeholder

³ <https://www.lshtm.ac.uk/aboutus/organisation/governance/committees>

⁴ [Procedure for inquiring into allegations of research misconduct](#)

⁵ [Good Research Practice policy](#)

interviews done as part of the Head of RG&I's Operational and Policy Analysis, the updated policy was reviewed and approved with minor comments by RGC in October 2021 (Version 5.0 of the policy (20/12/2021)).

A summary of policies related to research governance and integrity is listed in Appendix 1.

5. Allegations of Breaches of Research Integrity/ Research Misconduct

In the period 1 April 2021 – 31 March 2022, two complaints were made to the RGIO. One allegation was handled by the Legal Department and falls outside the scope of this report as it related to a data breach. For the second, an investigation was completed, and it was not confirmed as a breach of research integrity.

The complaints can be summarised as:

Category of Breach of Research Integrity	Number of complaints
Data Breach	1
Breach of ethics approval	1
TOTAL	2

In last year's Audit and Risk Committee report (2020-2021), one investigation was noted to have been referred to the formal investigation panel. This has now been completed and the complaints are upheld:

References	Topic Area	Specifics of Complaint	Outcome	Correction & Prevention	Progress
RM-2021-049G	Falsification and breach of duty of care	Staff members were alleged to have taken payment for Covid-19 tests by registering them onto a research project: 185/770 participants are suspected to be ineligible and paid for the tests which should have been free.	Met the threshold for fraudulent activity (on the balance of probability).	All studies must have a named Principal Investigator who works alongside the team and is on-site	This is detailed in the Good Research Practice (v5).
				As part of any handover when a member of staff leaves, the leaving interview should identify current and actively recruiting research projects and have a named individual to cover as supervisor/PI. If a suitable replacement cannot be found, the project should be halted until the replacement is named.	This is detailed in the LSHTM SOP on Sponsorship and Insurance (LSHTM-SOP-002-005).
				Risk assessment to include supervision and resource scarcity which may provide opportunities for fraud.	A full review of the LSHTM risk assessment to take place Q2-Q3, 2022.
				Comms teams should routinely review social media for mention of LSHTM to proactively manage allegations of improper conduct. The Units should have named investigators into allegations of research misconduct and should be trained in the specifics of the investigation process. This is a funder requirement and is considered best practice via UKRIO.	Comms routinely scan social media, and this incident has been highlighted to the Head of Comms at LSHTM.
				The Procedure for Inquiring into Allegations of Research Misconduct should be simplified. A full review of the procedure is due to take place once the updated procedure is released from the UK Research Integrity Office. It is noted that many funders require a procedure that conforms to the UKRIO best practice process.	Training has taken place at the Units, and named Research Governance leads, along with colleagues in HR, will be able to undertake investigations into research misconduct.
					The review is in progress and will be submitted to Senate for approval in October 2022.

6. Concluding Statement

LSHTM continues to support and embed a research environment underpinned by a culture of integrity. The Head of RG&I, both through her role as an RD student and as head of the department, is in tune with the issues that arise in the global arena and is an active participant in conferences and meetings focussing on research integrity. Staff and students are reminded that she can be approached both formally and informally to discuss integrity issues. This will be further enhanced with the proposed development of research integrity champions across the faculties and units.

The Audit and Risk Committee are asked to note that this report will be made publicly available.

Patricia Henley
Head of Research Governance and Integrity
25 May 2022

Appendix 1: Summary of Research Governance and Integrity policies and procedures

RGIO Policies

- Good Research Practice Policy, v5.0; 20 December 2021
- Human Tissue Act policy, v6.1; 05 February 2021
- Procedures for Inquiring into Allegations of Scientific Misconduct, v2.3; 30 Sept 2020
- Ethics Committee Terms of Reference, v2.4; 22 February 2022
- Statement on contact with the tobacco industry, from Prof Peter Piot, February 2018

Other relevant LSHTM policies

- Animal research policy
- Anti-bribery conduct policy and procedures
- Anti-bullying and harassment policy
- Conflicts of interest
- Data protection policy
- Dissemination of health and safety information
- Freedom of Information
- Information management and security policy
- Intellectual property policy
- Open-access publishing policy
- Records management policy
- Research data management Policy
- Whistleblowing
- Financial fraud investigations

Under review:

- Engaging with External Partners guide

On the RGIO intranet page:

- Standard Operating Procedures and templates on research oversight, regulatory applications and approvals, design, management, conduct, and completion of research