1. Background

Wellcome expects its funded researchers and their employers to abide by the Concordat on Research Integrity if they are based in the UK, or similar guidelines if based outside the UK. This forms part of our grant conditions and is described in our good research practice guidelines (wellcome.org/grant-funding/guidance/good-research-practice-guidelines). We also require flow through of our grant conditions to third parties.

Organisations are required to abide by all relevant legal and ethical requirements. Wellcome-specific conditions are communicated to every award-holder at award point and signposted on our website. Wellcome audits a small selection of funded organisations each year to ensure our expectations are clear and our conditions implemented.

The Director of Research Funding is named on the website as a direct contact for research integrity, specifically within our research misconduct, and bullying and harassment policies. These also describe how Wellcome manages cases reported to us and how we support those on our awards who may be impacted.

Wellcome is a member of the UK Reproducibility Network and the UKRI bullying and harassment forum, and supports NC3Rs and Understanding Animal Research.

Following the publication of the updated Concordat in 2019, Wellcome undertook a review of its activities and assessed its compliance with the refreshed funders’ commitments in the Concordat. Whilst Wellcome was already compliant with the majority of the requirements, we also identified areas for improvement and new opportunities to promote the Concordat agenda.

2. Recent activity

Recent activity related to the funder requirements in the Concordat include:

- “take research integrity into account in the development of policies and processes”
  - Wellcome launched its new strategy and schemes during 2020/2021. As part of the refresh, we have increased the emphasis on assessing the research environment and provided researchers space to highlight the work they have done to maintain and improve research integrity (wellcome.org/what-we-do/our-work/research-culture)

- “through engagement with the signatories and other stakeholders, explore ways of streamlining their requirements to reduce duplication, inconsistency and/or conflict”
  - We funded a review of the concordats and agreements within the UK (universitiesuk.ac.uk/topics/research-and-innovation/research-concordats-and-agreements) and are actively working with the “owners” of these initiatives to streamline them.
  - Wellcome has established and currently co-ordinates a small informal funders policy group to identify areas where we can work better together and discuss the impact of future policies.

- “consider whether their policies and processes create disincentives for the creation and embedding of a positive research culture”
  - As part of the new scheme design, we actively considered how we could support the sector to embed a positive research environment. For example, i) the organisation must commit to facilitating 10 days/year training, ii) for our intermediate level award where we pay the salary of the PI, the organisation must
undertake a formal review of progress part way through the award and iii) we have adopted the core of the Résumé for Researchers narrative CV.

- “work in partnership with employers and researchers to embed a culture of integrity within the research community”
  - Wellcome published results of a survey into research culture in 2020 (wellcome.org/reports/what-researchers-think-about-research-culture), and ran a series of in person and virtual (pandemic impacted) ‘town halls’ to explore the issues further (wellcome.org/sites/default/files/wellcome-townhalls-report.pdf).
  - This was followed by a virtual Research Culture festival in March 2021 to stimulate actions in the community (wellcome.org/what-we-do/our-work/research-culture/reimagine-research-culture-festival).
  - We have worked on the ground with organisations handling cases of research misconduct, and bullying and harassment, to ensure a proportionate and appropriate response to cases reported to us. The number of cases we have received since the launch of our bullying and harassment policy in 2018 are given below.

<table>
<thead>
<tr>
<th>Number of allegations reported to Wellcome (from any source) and linked to organisations in receipt of Wellcome funding</th>
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<tbody>
<tr>
<td>Since May 2018</td>
</tr>
<tr>
<td>2021 (to 30 Sep)</td>
</tr>
<tr>
<td>2020</td>
</tr>
<tr>
<td>2019</td>
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<td>2018 (May onwards)</td>
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• “periodically review their processes and practices to ensure that these are not providing inappropriate incentives"
  - During development of our new funding schemes, we have reviewed our policies and practices and updated them where required.
  - We have reviewed and aligned our own policies on research misconduct and bullying and harassment.

### 3. Future activity

Over the coming year, we have plans to focus on the following areas:

- “take research integrity into account in the development of policies and processes”
  - We are currently reviewing our good research practice guidance to streamline and update it. It is likely we will change the title to the Responsible Conduct of Research to more accurately describe the content. A comparison with UKRI’s new code has been completed and there are two areas of difference, both related to how we manage cases.
  - As part of the review of Good Research Practice, we have identified the potential need for a new policy on continual professional development and we are working with other funders to identify if a common policy will work.
  - An action arising from our scheme redesign work is to consider if it is appropriate to develop an Equity, Diversity and Inclusion policy for funded organisations.

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<sup>1</sup> Number of sanctions applied in the year specified. Note that this may not be the same year that the allegation was reported.

<sup>2</sup> Numbers in brackets are further allegations reported to us where there was no follow-up with the employer, for example if the complainant decided not to pursue the allegation.
• “work in partnership with employers and researchers to embed a culture of integrity within the research community”
  o Wellcome is leading a piece of work to bring together funders, employer bodies and regulators to discuss data handling in cases of bullying and harassment. This is being informed by the work of Universities UK and the Information Commissioners Office into information provision in staff disciplinary cases.
• “through engagement with the signatories and other stakeholders, explore ways of streamlining their requirements to reduce duplication, inconsistency and/or conflict”
  o Wellcome is represented on the UKRI/BEIS bureaucracy working group
  o We will continue to work with other funder representatives to, for example, streamline due diligence and assurance mechanisms.
• “consider whether their policies and processes create disincentives for the creation and embedding of a positive research culture”
  o Work will continue as we complete the detailed design of Wellcome’s new schemes, both for Discovery Research and the Challenge Areas.