Section 1: Key contact information

<table>
<thead>
<tr>
<th>Question</th>
<th>Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>1A. Name of organisation</td>
<td>Wellcome Trust</td>
</tr>
<tr>
<td>1B. Type of organisation: higher education institution/industry/independent research performing organisation/other (please state)</td>
<td>Research funder</td>
</tr>
<tr>
<td>1C. Date statement approved by governing body (DD/MM/YY)</td>
<td>30th January 2023</td>
</tr>
<tr>
<td>1D. Web address of organisation’s research integrity page (if applicable)</td>
<td><a href="https://wellcome.org/grant-funding/guidance/responsible-conduct-research">https://wellcome.org/grant-funding/guidance/responsible-conduct-research</a> <a href="https://wellcome.org/grant-funding/guidance/grant-funding-policies">https://wellcome.org/grant-funding/guidance/grant-funding-policies</a></td>
</tr>
<tr>
<td>1E. Named senior member of staff to oversee research integrity</td>
<td>Dr Alyson Fox, Director of Research Funding</td>
</tr>
<tr>
<td></td>
<td>Email address: <a href="mailto:a.fox@wellcome.org">a.fox@wellcome.org</a></td>
</tr>
<tr>
<td>1F. Named member of staff who will act as a first point of contact for anyone wanting more information on matters of research integrity</td>
<td>Dr Alyson Fox, Director of Research Funding</td>
</tr>
<tr>
<td></td>
<td>Email address: <a href="mailto:a.fox@wellcome.org">a.fox@wellcome.org</a></td>
</tr>
</tbody>
</table>

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

As part of its grant terms and conditions all Wellcome-funded organisations and researchers are required to abide by all relevant legal and ethical requirements, as well as the Concordat to Support Research Integrity if they are based in the UK, or similar guidelines if based outside the UK. This is described in our guidance on the Responsible Conduct of Research. We have specific policies on research misconduct, bullying and harassment and published a new policy on Continuing Professional Development (CPD) during 2022. We also require flow through of our grant conditions to third parties.

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. Wellcome has engaged with external activities, including workshops held by the UK Committee on Research Integrity (UKCoRI) and the Independent Review of Research Bureaucracy.

Wellcome is a member of the Research Integrity Concordat Signatories (RICS) group, UKRN and the UKRI bullying and harassment forum, and supports NC3Rs and Understanding Animal Research. We have jointly funded the review of Concordats and Agreements, due to report early in 2023.
Quarterly case reports and an annual grants assurance report, covering relevant policy management and compliance related to funded organisations and researchers, are considered by Wellcome’s Audit and Risk Committee (ARC). The ARC also receives similar reporting with respect to Wellcome’s own staff.

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.

Wellcome has updated its guidance on the Responsible Conduct of Research (published in March 2022) and launched a new funding policy on Continuing Professional Development (CPD) in August 2022. Feedback from a small number of organisations and the Research Funders Policy group was sought on the CPD policy and incorporated before launch.

We have completed a feasibility assessment for a funding policy on Equity, Diversity and Inclusion to support research culture. It is likely that Wellcome will publish a statement describing its expectations of researchers and organisations including a funding policy on discrimination.

The Concordats and Agreements Review (part-funded by Wellcome) progressed through 2021/22 and the report will be published in spring 2023.

We have developed an e-learning module for Wellcome staff describing how we manage information related to misconduct cases reported to us by external contacts. Additionally, we have strengthened our internal resources, policies and reporting process for Wellcome staff.

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.

Wellcome regularly reviews its policies and this process successfully identified the need to update and refresh how we provide information to those we fund with respect to the responsible conduct of research. The last year has also seen the research environment return to near normal after COVID and this has enabled us to re-focus on continual improvement activities.

Over the next reporting period we plan to:
- Launch a statement on equity, diversity and inclusion related to our funding.
- Update and publish an expanded bullying & harassment policy to include abuse and wider forms of harm.
- Continue work to ensure compliance with our policies.
- Continue to discuss the management of information in misconduct cases.
- Consider whether a formal Research Integrity Promotion Plan would be of benefit.

Through the Concordat to Support Research Integrity Signatories group we will help to:
- Finalise the Concordat and Agreements Review.
- Begin the planning for the quinquennial review of the Concordat.
- Take part in the Annual Research Integrity Forum.

With other funders, we will input where relevant to:
- Assist with the work of UKCoRI.
- Identify areas to reduce administrative burden, in alignment with the BEIS Review on Research Bureaucracy.
### 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.

Wellcome does not directly investigate individual cases of research misconduct nor implement research organisation improvement initiatives.

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### 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.

Relevant links to policies are:

1. [https://wellcome.org/grant-funding/guidance/responsible-conduct-research](https://wellcome.org/grant-funding/guidance/responsible-conduct-research)
2. [https://wellcome.org/grant-funding/guidance/research-misconduct](https://wellcome.org/grant-funding/guidance/research-misconduct)

The Responsible Conduct of Research Guidance, Research Misconduct and Bullying & Harassment policies were updated in 2022. References to Trusted Research were added and clarity between policies and guidance. A need for a new continuing professional development policy was identified and subsequently launched. [https://wellcome.org/grant-funding/guidance/continuing-professional-development-policy](https://wellcome.org/grant-funding/guidance/continuing-professional-development-policy)

Wellcome has a facility called TalktoUs which allows those outside of Wellcome to submit general feedback [https://wellcome.org/who-we-are/contact-us](https://wellcome.org/who-we-are/contact-us) (more specific contacts are on the pages above). For Wellcome staff we operate a parallel SpeakUp process.

From time to time we are hindered by an organisation not providing us with the information we require, and on a timely basis. Where cases have been managed with trust and honesty between all parties involved, their resolution has been quicker, less burdensome and more satisfactory for all.
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.

<table>
<thead>
<tr>
<th>Type of allegation</th>
<th>Number of allegations reported to the organisation</th>
<th>Number of formal investigations</th>
<th>Number upheld in part after formal investigation</th>
<th>Number upheld in full after formal investigation</th>
<th>Number of sanctions</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fabrication</td>
<td>3</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td>Falsification</td>
<td></td>
<td></td>
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<tr>
<td>Plagiarism</td>
<td>4</td>
<td>1</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Failure to meet legal, ethical and professional obligations</td>
<td>5</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td></td>
</tr>
<tr>
<td>Misrepresentation (eg data; involvement; interests; qualification; and/or publication history)</td>
<td>2</td>
<td></td>
<td></td>
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<td></td>
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<tr>
<td>Improper dealing with allegations of misconduct</td>
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<tr>
<td>Multiple areas of concern (when received in a single allegation)</td>
<td>4</td>
<td>1</td>
<td>1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other*</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Bullying and Harassment</td>
<td>8</td>
<td>3</td>
<td>3</td>
<td>2</td>
<td></td>
</tr>
<tr>
<td>Total:</td>
<td>26</td>
<td>7</td>
<td>1</td>
<td>5</td>
<td>4</td>
</tr>
</tbody>
</table>

*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.

Whilst not categorised under the research misconduct groupings, our bullying and harassment policy relates to the management of research culture, which is known to be linked to research integrity. We have therefore reported the cases referred to us here for transparency.

Sanctions imposed on individuals are listed in the table above. No sanctions were levied on organisations during this reporting period.