Wellcome Trust annual statement on Research Integrity 2022-2023

Section 1: Key contact information

Question	Response
1A. Name of organisation	Wellcome Trust
1B. Type of organisation: higher education institution/industry/independent research performing organisation/other (please state)	Research funder
1C. Date statement approved by governing body (DD/MM/YY)	22nd January 2024
1D. Web address of organisation's research integrity page (if applicable)	https://wellcome.org/grant-funding/guidance/responsible-conduct-research https://wellcome.org/grant-funding/guidance/grant-funding-policies
1E. Named senior member of staff to oversee research integrity	Dr Alyson Fox, Director of Research Funding
	Email address: a.fox@wellcome.org
1F. Named member of staff who will act as a first point of contact for anyone wanting more information on matters of research integrity	Dr Alyson Fox, Director of Research Funding
	Email address: a.fox@wellcome.org

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 comply with 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 (expanded in 2023 to include abuse and other harms) and Continual Professional Development which make clear our expectations of institutions and researchers in these areas, and we published new EDI policy in 2023 which covers discrimination. We require flow through of our grant conditions to third parties.

Wellcome-specific conditions are communicated to every grantee and their host institution at the point of award 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 as a member of a UK Committee on Research Integrity (UKCoRI) working group.

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, which reported in 2023.

Misconduct cases are reported at an aggregate level quarterly to Wellcome's Audit and Risk Committee (ARC), and grants assurance activities covering relevant policy management and compliance related to funded organisations and researchers is reported annually. 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.

- A new Equity Diversity and Inclusion has been policy published, which includes our position on managing cases of discrimination.
- Our Bullying and Harassment policy was expanded to include abuse and other harms.
- Wellcome was a signatory on the position statement on artificial intelligence use in the funding application process, as part of the Research Funders Policy Group.
- The Concordats and Agreements Review (part-funded by Wellcome) published.
- Wellcome is leading the development of a set of information modules on personal data management in research misconduct cases, in collaboration with other national bodies, including UKRI.

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 resulted in the introduction of an EDI policy and amendments to the Bullying and Harassment policy during 2023. The Concordats and Agreements review was published.

Over the next reporting period we plan to:
- Replace our internal case management system to improve security, workflow and monitoring.
- Launch a pilot to collate and centralise information on funded organisations' alignment with funder policies.
- Launch knowledge modules concerning the management and disclosure of personal data in misconduct cases.
- Complete the work on a proposed Research Integrity Promotion Plan and assess its utility.

Through the Concordat to Support Research Integrity Signatories group we will help to:
- Be part of the working group 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, including on grants assurance.

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 alleged research misconduct nor implement research organisation improvement initiatives.

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.

Wellcome has a range of policies and guidance relevant to research integrity which form part of our terms and conditions. These are regularly reviewed and the date of the last is provided on each page:

- https://wellcome.org/grant-funding/guidance/responsible-conduct-research
- https://wellcome.org/grant-funding/guidance/research-misconduct
- https://wellcome.org/grant-funding/guidance/bullying-and-harassment-policy
- https://wellcome.org/grant-funding/guidance/continuing-professional-development-policy
- https://wellcome.org/grant-funding/guidance/equity-diversity-inclusion-policy

Wellcome has a facility called TalktoUs which allows those outside of Wellcome to submit general feedback alongside with the named contacts / procedures outlined in the pages above. We also encourage best practice (e.g. Whistleblowing processes) with the organisations we fund. [https://wellcome.org/grant-funding/guidance/open-access-guidance/research-organisations-how-implement-responsible-and-fair-approaches-research]. Internally, Wellcome staff have access to a parallel SpeakUp process to anonymously raise concerns. All staff are required to complete mandatory training relating Safeguarding and our responsible Code of Conduct.

Wellcome is reliant on funded researchers and organisations to inform us about any allegations of research misconduct.

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 parties.

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 sanctions
	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	1	1		1	1
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**					
Bullying, Harassment, abuse and harm	**5**	**4**	**1**	**3**	**2**
Total:	**8**	**6**	**1**	**5**	**3**

*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, harassment, abuse and harm 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. One temporary sanction related to the reported cases was levied on an organisation.

1. Summary statement for signatories' report

In 2023, Wellcome published a new funding policy on Equity, Diversity and Inclusion including discrimination and expanded its Bullying and Harassment policy to cover abuse and others harms, to support research culture.

With other stakeholders in the sector, we have:
- *Become a member of UKCoRI's working group 'Addressing research misconduct'.*
- *Published the outcomes of the Concordats and Agreements Review (part-funded by Wellcome).*
- *Begun creating a set of knowledge modules to inform how to manage information in research misconduct and bullying and harassment cases.*

Worked on the ground with organisations handling cases to ensure a proportionate and appropriate response to cases reported