

Research Integrity Funder Requirements Guidance Document: Cancer Research UK (CRUK) - During Research

In addition to the below guidance, for existing grant holders, please also refer to the contract of your grant's terms and conditions for any additional or superseding potential requirements on these topics.

Bullying and Harassment:

Please familiarise yourself with the policy located here: <https://www.cancerresearchuk.org/funding-for-researchers/applying-for-funding/policies-that-affect-your-grant/policy-on-dignity-at-work-in-research>

1) Cross check outstanding sanctions as per Application Stage

2) Where a Host Institution employs Participants in CRUK research: (defined in Application Stage above and in section 3 of the policy), and a decision is made to formally investigate an allegation of bullying or harassment against those Participants, the Host Institution must inform CRUK's Head of Research Funding Operations when they decide to investigate. The Host Institution must inform CRUK of:

- a) A decision to formally investigate an allegation of bullying or harassment against a Participant; and**
- b) The outcome of the investigation**

Process: When the decision is made to formally investigate an allegation of bullying and harassment, the Faculty Head of HR Business Partnering should contact the relevant Head of School to confirm whether there are links to a CRUK grant. Taking advice from SECO (Secretarys-Office@bristol.ac.uk), the Head of HR Business Partnering will advise CRUK directly by completing the reporting pro-forma template below and emailing it to CRUK's Head of Research Funding Operations at dignityinresearch@cancer.org.uk.

Dignity at Work in Research Reporting Form to Cancer Research UK

Host Institutions must inform CRUK's Head of Research Funding Operations about:

- a. any decision to formally investigate an allegation of bullying or harassment against a Participant and, once it is known, the outcome of that investigation (note: this is not applicable at grant application stage); and
- b. at CRUK grant application stage only: an upheld allegation against the Lead Applicant(s) or any employees named on the application, for which there is an active formal disciplinary sanction. CRUK does not expect to be informed of ongoing and unresolved investigations (ie. para (a) above) for applicants until if and when the application is successful, or the allegation is upheld, whichever is earlier.

The Host Institution contact should complete this reporting template, indicating if any information is confidential and email it to dignityinresearch@cancer.org.uk. You should only provide the information requested below. You should not include:

- sensitive personal information, e.g. relating to criminal offences or convictions
- personal information about other people, e.g. the person making the claim.

Your name, position at Host Institution and email (CRUK cannot act on unverified, anonymous allegations)

The name of the person against whom either:

- 1) a formal investigation has commenced (*note: not applicable at grant application stage*); or
- 2) an allegation has been upheld

The person's connection to CRUK (e.g. CRUK grant reference number or CRUK Committee membership)

A brief factual statement about the nature of the allegation

Date the complaint was lodged

Start date of the investigation and expected/actual investigation completion date

For completed investigations only: a brief factual statement on the outcome of the investigation, including whether allegation was partially or fully upheld and any sanctions

Date of the outcome of the investigation

The information you send to CRUK will be: stored in accordance with data protection law requirements; communicated on a need-to-know, restricted-access basis only; and updated and/or deleted in line

Research Misconduct:

Please familiarise yourself with the policy located here: <https://www.cancerresearchuk.org/funding-for-researchers/applying-for-funding/policies-that-affect-your-grant/guidelines-for-scientific-conduct>

Of note in section 4.3, 4.4, 4.5 and 4.6 it states

“4.3 Responsibilities of the Host Institution to report allegations to CRUK

It is the responsibility of the Host Institution to inform CRUK’s Senior Policy & Governance Manager, Sue Russell via dignityinresearch@cancer.org.uk, in confidence, when a decision is made to formally investigate an allegation of research misconduct.

This applies to any employee or student at the Host Institution who is associated with:

- *...a CRUK grant.*

The Host Institution must tell CRUK (in confidence if the information is not in the public domain):

- *the name of the person against whom a full investigation has started into an allegation of research misconduct;*
- *the person’s connection to CRUK (e.g. relevant current or past CRUK grant reference number(s))*
- *a brief factual statement about the nature of the allegation*
- *details of any publications or other research outputs affected*
- *the start date of the investigation and expected/actual investigation completion date.*

The Host Institution must:

- *Keep CRUK informed during the process of investigation into allegations of research misconduct. We may choose to send a representative to observe any formal inquiry. Investigations should conclude within one year of receiving the allegation;*
- *Inform CRUK of the outcome of the investigation as soon as it is known;*
- *Provide CRUK with the final investigation report.*

This should confirm:

- *If the allegation was upheld;*
- *the findings of the investigation;*
- *if any sanctions are being imposed.*

CRUK expects institutions to complete the disciplinary procedure such that a formal finding can be reached, disciplinary procedures are applied and findings are documented.

4.4 Why CRUK asks to be informed and what we do with this information

...After an award has been made, the Host Institution must tell us when a formal investigation into research misconduct has been started. This is so that CRUK can:

- *monitor that complaints are being dealt with appropriately and in a timely manner;*
- *make sure that grantholders receive the support they need, and;*

- *be aware of the potential impact on CRUK-funded activities and the steps being taken to manage that impact.*

4.5 Sanctions

Research misconduct as defined in this policy covers a broad range of activity of varying severity, therefore any sanctions taken by CRUK in consequence will be on a case-by-case basis.

Reasonable steps should be taken by the Host Institution to resolve any issues found during the investigation. If the Host Institution or CRUK determines that the allegation of research misconduct is substantiated, we will consider appropriate sanctions. Sanctions may vary in length, depending on the seriousness of the case and any remedial action already in place. These will be independent of any set by the organisation and may include:

- *letter of concern*
- *removal from the application or grant in question*
- *withdrawal of current funding. CRUK will work with the Host Institution to minimise the impact on staff working on the affected grant(s), which may include transferring the grant to another suitable investigator to allow the work to be completed*
- *restriction from future grant applications*
- *requiring the withdrawal or correction of pending or published abstracts, papers or monographs produced by the research in question*
- *requiring the monitoring of future work*
- *repayment of any grant*

Where allegations of research misconduct are upheld, we expect Host Institutions to implement appropriate disciplinary procedures.

CRUK may apply sanctions against a CRUK-funded Host Institution if CRUK believes:

- *the Host Institution has failed to respond to a research misconduct complaint promptly and objectively;*
- *the Host Institution has failed to keep CRUK informed;*
- *there has been institutional-level failure to complete disciplinary procedures;*
- *there has been a serious Institutional-level failure to effectively ensure appropriate good research conduct standards are observed.*

Sanctions we apply against Host Institutions may include:

- *ongoing monitoring of the Host Institution's policies and practices;*
- *not accepting new grant applications from that Host Institution for a period of time;*
- *suspending funding to the Host Institution in extreme cases;*
- *taking any further sanctions at its own discretion.*

4.6 CRUK's right to investigate

As stated above, it is the Host Institution's responsibility to investigate allegations of research misconduct and this is our preferred course of action.

However, CRUK may:

- *ask for information about a Host Institution's processes and how they are effectively implemented;*

- *check that a Host Institution and any sub-grantee have a policy and are following it.*

This may be done as part of CRUK's standard grants management audits or as part of the annual review process in the case of Host Institutions holding core-funding from CRUK.

If an investigation has been completed and an individual has concerns about the process, CRUK will ask the Host Institution to confirm that it has adhered to its published policy. We are not able to challenge the outcome of the investigation.

Formal allegations, reports of allegations or complaints about process, should be reported to CRUK, as outlined in this policy, and within ten years of the alleged misconduct having taken place.

Where we exercise our right to see the above information, we expect organisations to be able to share it. We strongly discourage the inappropriate use of non-disclosure agreements that might prevent organisations from sharing this information with us.

In exceptional cases, CRUK also reserves the right for it, or its agents, to investigate any aspect of research misconduct itself that concern CRUK-funded researchers (for example, where our reputation is at risk or we are dissatisfied with the investigation undertaken by the Host Institution).

Any investigations will only be undertaken following consultation with the appropriate representative(s) of the Host Institution."