

Research Integrity Funder Requirements Guidance Document: Wellcome Trust - 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.

Please familiarise yourself with the Wellcome Trust Bullying and harassment policy and Research Misconduct policy:

<https://wellcome.ac.uk/funding/guidance/policy-bullying-and-harassment>

<https://wellcome.ac.uk/funding/guidance/research-misconduct>

At Application Stage:

Bullying and Harassment

1) *When an organisation submits a grant application to Wellcome Trust, they must confirm that the lead applicant (and sponsor and supervisor if relevant), has not had an allegation of bullying or harassment upheld against them for which there is either a current formal disciplinary warning or an active sanction. If they have, Wellcome may reject the application.*

Process: Assistant Finance Business Partner writes to the Head of School using the following template.

"Dear Head of School, as part of the approval and submission process the Wellcome Trust (WT) requires the University to confirm that the lead applicant (and sponsor and supervisor if relevant) has not had any allegation of research misconduct made against them nor any allegation of bullying or harassment upheld against them for which there is either a current formal disciplinary warning or an active sanction. If they have, the WT may reject the application. If you are aware of any upheld finding for the following employees can you please respond directly to Wellcome's Director of Grants a.fox@wellcome.ac.uk. If you are unsure for any employees, please check with the following expert teams – Faculty Head of HR Business Partnering for bullying and harassment and the Director of Legal Services for research misconduct (Secretarys-Office@bristol.ac.uk).

[list names of lead applicant, sponsor and supervisor if relevant].

We are working to a tight deadline; can you please confirm that this has been done via return email to me no later than [xx.xx.xxx].

Process: Where an applicant is not an employee of the University, the Wellcome terms and conditions will flow down via the contract process.

Process: Heads of HR Business Partnering to make sure Heads of School are always up to date with upheld cases and sanctions. This is especially important when Heads of School change or during interim cover.

2) *Make sure there is an equivalent policy in place at any sub-awardee organisation, if relevant.*

Process: RED Contracts to flow down in the Wellcome Trust terms and conditions in the subcontract or partnerships agreement highlighting their responsibilities as sub-awardees.

Research Misconduct

1) Inform Wellcome's Director of Grants, in confidence, about any allegations of research misconduct made against employees at the organisation who are funded by Wellcome or have an application for funding under consideration. Information on the category of research misconduct and the investigation process must be provided. This should be done as soon as possible, and in any event no later than the point at which a decision is made to conduct an investigation, preliminary or otherwise. If there is a full investigation, the host organisation must tell Wellcome the name of the respondent, in confidence

2) Keep Wellcome informed during the process of investigation of 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.

3) Inform Wellcome of the outcome of the investigation as soon as it is known and provide us with the final investigation report.

Process: When the decision is made to formally investigate an allegation of research misconduct, the Director of Legal Services should contact the relevant Head of School to confirm whether there are links to a Wellcome Trust grant. The Director of Legal Services then respond to Wellcome's Director of Grants directly at a.fox@wellcome.ac.uk.

At Award Stage:

1) Cross check outstanding sanctions as per Application Stage.

2) Bullying and Harassment – Tell Wellcome's Director of Grants, when an investigation has been opened into an allegation of bullying or harassment. This should include a brief factual statement about the nature of the allegation. This applies to any employee at the organisation who is associated with:

- A grant application (either as a lead applicant, sponsor or supervisor)
- A Wellcome grant (see list of participants in the policy)
- A Wellcome advisory committee

2) Contact Wellcome's Director of Grants again when the investigation has been completed and any final appeal has been heard. This should confirm:

- If the allegation was upheld
- The findings of the investigation
- If any are sanctions being imposed

The investigation should still be concluded if the subject of the investigation resigns during the process.

Process: When the decision is made to formally investigate an allegation of bullying and harassment, or an investigation is completed, the Faculty Head of HR Business Partnering (for Employees) or Student Complaints Officer (for Students) should contact the relevant Head of School to confirm whether there are links to a BHF grant. Taking advice from SECO (Secretarys-Office@bristol.ac.uk), the Head of HR Business Partnering will then advise Wellcome's Director of Grants directly at a.fox@wellcome.ac.uk.

3) Research Misconduct

Process: When the decision is made to formally investigate an allegation of research misconduct, the Director of Legal Services should contact the relevant Head of School to confirm whether there are links to a Wellcome Trust grant. The Director of Legal Services then respond to Wellcome's Director of Grants directly at a.fox@wellcome.ac.uk.

Conflict of Interest

Please familiarise yourself with the policy located here: <https://wellcome.org/grant-funding/guidance/conflicts-interest-policy-wellcome-funded-researchers-and-commercial-organisations>

Of note: “Researchers must:

- ensure that commitments to other activities do not prejudice the timely delivery of Wellcome-funded research
- avoid any activities that jeopardise the ethical conduct of research and/or the potential use of Wellcome-funded research outputs to improve human health
- disclose to their organisation as soon as possible any actual or potential conflict of interest related to the conduct of Wellcome-funded research and/or the potential use of resulting research outputs.

In particular, in each case where a commercial entity has a potential interest in the Wellcome-funded research or in any directly related fields, researchers must inform their organisation and comply with their organisation’s requirements:

- before they act as a consultant or adviser to that commercial entity
- before they enter into any research collaboration, sponsorship or other funding agreement with that commercial entity
- before accepting any directorship at that commercial entity

if the researcher, or any immediate family member, is employed by or owns shares in, that commercial entity.

Where there has been a breach of our policy

Where there has been a potential breach of this policy or a host organisation’s policy on conflicts, we should be informed as soon as possible about the issues identified and the actions taken. Any breaches should be handled in accordance with our research misconduct policy.

- Wellcome-funded researchers and host organisations must provide to us on request:
- copies of the organisation’s conflicts of interest policy, monitoring procedures and decisions
- current information about consultancies, advisory roles, directorships and other relationships of relevance to this policy, together with details of any relevant income and shareholdings
- all other relevant information or documentation required for us to review the management of a conflict of interest.”