

Research Integrity Funder Requirements Guidance Document: Cancer Research UK (CRUK) – At Application Stage

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 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) *when a Host Institution submits a grant application to CRUK, it must confirm that, other than as notified to CRUK there have been no findings of bullying or harassment upheld against the Lead Applicant(s), nor any of its employees who are named on the application as proposed Participant (Grantholders, Co-investigators, Collaborators, Research staff and consultants, Supervisors, Students, Sub-grantees and sub-contractors, CRUK funding committee and panel members, CRUK research events speakers), for which there is an active formal disciplinary sanction for bullying or harassment. If there has been a finding of bullying and harassment, CRUK may reject the application or ask that the relevant individual(s) be removed from it.*

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 CRUK requires the University to confirm that the lead applicant or any of its employees who are named on the application as proposed Participants have not had any allegations of bullying or harassment upheld against them for which there is an active formal disciplinary sanction. If they have, CRUK may reject the application. If you are aware of any upheld finding for the following employees can you please ask your Head of HR Business Partnering to respond directly to the funder by completing the reporting pro-forma template (in the next section) and emailing it to CRUK's Head of Research Funding Operations at dignityinresearch@cancer.org.uk. If you are unsure for any employees, please check with your Faculty Head of HR Business Partnering.

[list names of Grantholders, Co-investigators, Collaborators, Research staff and consultants, Supervisors, Students, Sub-grantees and sub-contractors, CRUK funding committee and panel members, CRUK research events speakers].

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 CRUK 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.

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:

- *an application for funding under consideration...*

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

During the application stage, CRUK needs to be aware of upheld allegations, so that we can make responsible funding decisions...

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.”

