



Procedure for the Investigation of Allegations of Misconduct in Research

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Procedure for the Investigation of Allegations of Misconduct in Research

1. Introduction

The University of Wolverhampton is committed to maintaining the highest standards of ethics and integrity in its research, and to ensuring that all researchers should be able to pursue their work in an atmosphere free of prejudice and harassment.

All researchers at the University are expected to conduct research in accordance with the core elements of research integrity, namely honesty in all aspects of research, rigour in line with prevailing disciplinary standards and norms, transparency and open communication, and care and respect for all participants in and subjects of research.

Misconduct in research can have wide-ranging and damaging consequences, harming the integrity of research, bringing the individuals involved and the organisation into disrepute and causing harm to those involved. It can also damage public confidence in research.

The Procedure adopted by the University of Wolverhampton to investigate allegations of research misconduct draws on the UK Research Integrity Office's (UKRIO) [Procedure for the Investigation of Misconduct in Research \(2023\)](#). It aligns with external standards and guidelines, including the [Concordat to Support Research Integrity \(2019\)](#), and best practice outlined by UKRI research councils' investigation procedure.

The University takes seriously any allegation of research misconduct and will be responsible for monitoring all research and investigating any alleged misconduct.

2. Purpose

This Procedure recognises that the investigation of allegations of research misconduct can involve complex issues and seeks to discharge the University's responsibilities sensitively and fairly. It outlines the process to be followed when allegations of misconduct in research are brought against a researcher about research conducted under the auspices of the University.

This Procedure operates alongside other policies and procedures, both in terms of outlining the University expectations relating to research governance and conduct.

- [Research Policies, Procedures and Guidelines](#)
- [Code of Good Research Practice](#)
- [Transparency Policy](#)
- [Disciplinary Policy & Procedure](#)
- [Student Disciplinary Regulations](#)

3. Scope

This Procedure applies to any person conducting research under the auspices of the University of Wolverhampton. This includes research conducted solely or in conjunction with others in the university or in conjunction with other bodies, including but not limited to:

- a) a member of staff or former member of staff
- b) a research student (including visiting students registered elsewhere who are conducting research at the university)
- c) an independent contractor or consultant
- d) a person with visiting or emeritus status; and
- e) a member of staff on a joint or honorary contract.

Alleged misconduct relating specifically to the assessed element of a research degree, i.e. Annual Progress Review, Progression Stage, the thesis, or a resubmitted thesis will be dealt with under the Research Degree Regulations 'Appendix 13: Procedure for managing an alleged assessment offence'. However, alleged misconduct in a research degree programme relating to the conduct of the research itself will be investigated using these procedures.

When allegations of misconduct in research are raised that include allegations of bullying/harassment, the University will determine whether those allegations are investigated under this Procedure or the appropriate disciplinary policy.

Financial fraud or other misuses of research funds or research equipment may be addressed under the Transparency Policy, instead of under this Procedure.

The university will follow this Procedure through to its natural end point as far as possible even if:

- a) any individual(s) concerned leaves or has left the university, either before the operation of this Procedure is concluded or before the allegation(s) of research misconduct was made.
- b) the **Complainant(s)** withdraws the allegation at any stage.
- c) the **Respondent(s)** admits the allegation in full or in part.
- d) the Respondent(s) admits to other forms of misconduct (research misconduct or otherwise).
- e) the Complainant(s) and/or the Respondent(s) withdraw from the Procedure.

After an investigation into alleged misconduct when a Respondent is deceased, or is not a current member of staff/student of the university (such as former staff/students, visiting staff/students, those on honorary contracts), the Pro-Vice Chancellor Research & KE (PVC R&KE) will determine the nature of any further action to be taken in relation to the investigation and its outcome.

If at any stage of this Procedure, a Respondent or anyone else whether involved in the matter or not raises a counter-allegation of misconduct in research, or an allegation of misconduct in research unrelated to the matter under investigation, these allegations will be addressed under this Procedure as separate matters and will be forwarded to the PVC R&KE for consideration.

4. Principles

The investigation of allegations of misconduct in research will be conducted by the highest standards of integrity, accuracy, fairness, and sensitivity.

A presumption of innocence is maintained until the investigation is complete and complainants who have made allegations in good faith, whether substantiated or not, will be protected.

The Procedure will be carried out in accordance with the principles set out below:

Fairness – Each complaint is handled in a consistent, orderly, fair, and just manner.

Transparent – The Procedure is made available on the website. Allegations and responses are made known to the parties, and decisions are explained and documented.

Professional and Impartial – Each case is handled based on goodwill and with a belief that there is no malicious intent on the part of anyone involved. All parties are treated equally and impartially.

Democratic – Both parties have an opportunity to be heard. The process includes checks and balances.

Efficient – The process is resolved promptly, whilst allowing proper time for quality deliberation.

Educative – The process is intended to be educative with regard to ethics and good research practice for all parties involved.

Equality, diversity, and inclusion - Where the allegations concern any equality, diversity, or inclusion issues, those carrying out the Procedure will be appropriately trained or have relevant experience in dealing with equality, diversity, and inclusion matters.

Where a Complainant, Respondent or other person involved in the investigation has difficulties at any stage of the procedure due to a disability, a Specific Learning Difference (SpLD), or long-term health condition, they should discuss this with the PVC R&KE as soon as possible to allow reasonable adjustments to be made.

Confidentiality - The Procedure should be conducted as confidentially as is reasonably practicable to protect the Complainant, the Respondent, and others. The confidential nature of the proceedings should be maintained provided this does not compromise either the investigation, any requirements of health and safety or any issue related to the safety of research participants.

The identity of the Complainant or Respondent should not be made known to any third party unless:

- a) it has been deemed necessary (by those conducting the investigation) to carry out the investigation and/or to carry out required/ necessary actions or disclosures following the outcome of the investigation.

- b) it is necessary as part of the action taken against the Respondent if (at the end of the Procedure and/or any subsequent process, such as a disciplinary process, and after any appeals processes) the allegations have been upheld.
- c) it is necessary as part of the action taken against a person who has been found to have made malicious, vexatious, or frivolous allegations.
- d) it is the stated policy of a funder/ other national body that the identity of individuals proved through appropriate disciplinary and appeals processes to have committed misconduct in research should be made public.
- e) any party to the Procedure is seeking legal advice or other advice from another third party who owes them a duty of confidentiality.
- f) it is already in the public domain.
- g) it is required by law or by a regulator.

Any disclosure to a third party of the identity of the Complainant or Respondent, or of any other details of the investigation, should be made on a confidential basis.

While allegations are under investigation using this Procedure (and/or the disciplinary process), the Complainant, the Respondent, witnesses or any other persons involved in this Procedure should not make any statements about the allegations to any third parties, unless formally sanctioned by the University or otherwise required to by law.

Breaching confidentiality may lead to disciplinary action unless covered by the Public Interest Disclosure Act and/or the University's Transparency Policy.

Integrity - Anyone taking part in the processes as an Investigator, or a member of a Panel must make sure that the investigation is impartial and extensive enough to reach a reasoned judgement on the matter(s) raised. Similarly, those who give evidence to the investigation should do so honestly and objectively.

All parties involved must inform the PVC R&KE immediately of any interests that they have which might constitute a conflict of interest as regards any aspect of the allegations, the investigation, the area(s) of research in question, or any of the persons concerned.

Record Keeping - Confidential records will be maintained on all aspects, and during all stages, of the Procedure and notes will be made of all meetings convened under the Procedure. The Pro-Vice Chancellor Research & KE will retain all reports, correspondence, transcripts of meetings and other documentation relating to the operation of this Procedure. It is the responsibility of the Pro-Vice Chancellor Research & KE to see that such records are made available for any Disciplinary Process or other proceedings or actions which might follow the conclusion of the Procedure.

After the proceedings, all records should be retained in line with the document retention schedule. After the retention period, the university will retain anonymised summary information of investigations (e.g. in annual statements required by The Concordat to Support Research Integrity).

Records must only be retained beyond the normal retention period if:

- a) their retention can be justified for statutory, regulatory, or legal reasons; and/or
- b) the research project to which the records relate is still ongoing; and/or
- c) the retention period of the research project to which the records relate is longer.

Prevention of Detriment - In using this Procedure, and in any action taken as a result of using the Procedure, care must be taken to protect:

- individuals against frivolous, vexatious and/or malicious allegations of misconduct
- the position and reputation of those suspected of, or alleged to have engaged in, misconduct, when the allegations or suspicions are not confirmed; and
- the position and reputation of those who make allegations of misconduct in research in good faith, i.e., in the reasonable belief and/or based on supporting evidence that misconduct in research may have occurred.

It is acknowledged that allegations may be made for what appear to be malicious reasons. The Procedure should still be used where the Complainant makes a formal complaint, to establish whether the allegations are of sufficient substance to warrant investigation.

Any formal steps taken to discipline or otherwise reprimand the Complainant and/or Respondent or take steps which might undermine their good name or reputation (or that of any other party), must be taken through the disciplinary process. Only when allegations have been upheld through the disciplinary process and, where called upon, the appeals process, may it be appropriate to apply any sanctions.

The university will take all reasonable steps to ensure that the Respondent (or any other party) does not suffer because of unconfirmed or unproven allegations.

Involvement in the Procedure should not prevent the Respondent from being considered:

- a) for promotion.
- b) or the completion of probation.
- c) or other steps related to their professional development.

The university may choose to suspend the implementation of any promotion, completion of probation or any similar step, for the period that allegations are investigated using the Procedure, rather than delay the actual consideration of such matters.

If the allegations are upheld at the end of the Procedure, subject to the disciplinary process and/or appeals process, the normal rules related to professional development, should apply. It should be made clear that any actions that might be taken by the Pro-Vice Chancellor Research & KE in response to the notification of allegations of misconduct in research are not to be regarded as a disciplinary action and do not in themselves indicate that the allegations are believed to be true by the university.

The Pro-Vice Chancellor Research & KE and any Investigators and members of any Investigation Panels should take steps to make it clear to the Respondent, Complainant and any other involved parties that these actions are necessary to ensure that the allegations of misconduct in research can be properly investigated.

5. Definitions

The definition of research misconduct used throughout this document has been taken from the Concordat to support Research Integrity, namely:

'research misconduct is characterised as behaviours or actions that fall short of the standards of ethics, research and scholarship required to ensure that the integrity of research is upheld. It can cause harm to people and the environment, wastes resources, undermines the research record, and damages the credibility of research.'

The Concordat recognises that academic freedom is fundamental to the production of excellent research. This means that responsibility for ensuring that no misconduct occurs rests primarily with individual researchers.'

In the context of these procedures, misconduct is taken to mean:

- a) **fabrication**: making up results, other outputs (for example, artefacts) or aspects of research, including documentation and participant consent, and presenting and/or recording them as if they were real.
- b) **falsification**: inappropriately manipulating and/or selecting research processes, materials, equipment, data, imagery and/or consent.
- c) **plagiarism**: using other people's ideas, intellectual property, or work (written or otherwise) without acknowledgement or permission.
- d) **failure to meet**: legal, ethical and professional obligations, for example:
 - i) not observing legal, ethical and other requirements for human research participants, animal subjects, or human organs or tissue used in research, or for the protection of the environment.
 - ii) breach of duty of care for humans involved in research whether deliberately, recklessly or by gross negligence, including failure to obtain appropriate informed consent.
 - iii) misuse of personal data, including inappropriate disclosures of the identity of research participants and other breaches of confidentiality.
 - iv) improper conduct in peer review of research proposals, results or manuscripts submitted for publication. This includes failure to disclose conflicts of interest; inadequate disclosure of clearly limited competence; misappropriation of the content of material; and breach of confidentiality or abuse of material provided in confidence for the purposes of peer review.
- e) **misrepresentation** of:
 - i) data, including suppression of relevant results/data or knowingly, recklessly or by gross negligence presenting a flawed interpretation of data.
 - ii) involvement, including inappropriate claims to authorship or attribution of work and denial of authorship/attribution to persons who have made an appropriate contribution.
 - iii) interests, including failure to declare competing interests of researchers or funders of a study.

- iv) qualifications, experience and/or credentials.
- v) publication history, through undisclosed duplication of publication, including undisclosed duplicate submission of manuscripts for publication.
- f) **improper dealing with allegations of misconduct**: failing to address possible infringements, such as attempts to cover up misconduct and reprisals against whistle-blowers or failing to adhere appropriately to agreed procedures in the investigation of alleged research misconduct accepted as a condition of funding. Improper dealing with allegations of misconduct includes the inappropriate censoring of parties through the use of legal instruments, such as non-disclosure agreements.

For the avoidance of doubt, misconduct in research includes acts of omission as well as acts of commission. Honest errors and differences in, for example, research methodology or interpretations do not constitute research misconduct.

The basis for reaching a conclusion that an individual is responsible for misconduct in research relies on a judgement that there was an intention to commit the misconduct and/or recklessness in the conduct of any aspect of a research project. Where allegations concern an intentional and/or reckless departure from accepted procedures in the conduct of research that may not fall directly within the terms detailed above, a judgement will be made as to whether the matter should be investigated using the Procedure.

Other terms used in the procedure are:

- **Respondent** - the person against whom the allegation of misconduct has been made.
- **Complainant** - the person(s) making the allegation (may include external organisations e.g. journal editors).

Where allegations of misconduct are made by an individual or body external to the University, that individual or body will be made aware of the University's procedures and of the University's expectation that they will participate in the procedures and comply with their requirements.

6. Reporting allegations of misconduct in research

If an individual is unsure whether a suspected incident constitutes misconduct, they may have confidential discussions about concerns with the Director of Human Resources or Research Integrity Manager and seek advice about appropriate procedures to report allegations.

Formal allegations of misconduct should be reported via the three-stage process outlined below.

Use of Subject and Technical Expertise

At any stage confidential advice may be sought from persons with relevant expertise, both within the University and outside it. Persons consulted will be subject to the same requirements on confidentiality as others involved in the process.

To address technical aspects raised by an allegation, relevant tools or computer software for assessing different forms of misconduct such as plagiarism, data manipulation and fabrication may be used. The information provided for these purposes will be, so far as is possible, anonymised to protect the identity of the Complainant, Respondent or other individuals involved.

Persons who might be consulted include but are not limited to:

- experts in particular disciplines of research.
- experts in particular aspects of the conduct of research, such as members of research ethics committees, statisticians, editors of academic journals or equivalent persons from relevant areas of dissemination in research.
- experts in addressing misconduct in research and poor practice.
- representatives of Legal Services, Human Resources, Student Services, Finance; Governance/Registry, Research Office, Health and Safety Office, Library, Digital Services
- the Advisory Service of the UK Research Integrity Office.
- legal advisers.

Stage 1: Receipt of Allegations

The purpose of the Receipt of Allegations Stage is to assess an allegation of research misconduct that has been received, to determine the most appropriate process to investigate or address it. The primary aim is to determine whether the matter falls under the procedure for investigating misconduct in research. Its aim is **NOT** to investigate the substance of the allegation.

Timescale

This stage of the Procedure should be completed as soon as is practicable upon receipt of an allegation, if possible, within **ten** working days, provided this does not compromise the Standards and Principles of this Procedure and the full and fair assessment of the allegation. Any delays to this timescale will be explained to the Complainant in writing, presenting an estimated revised date of completion.

Process

The Complainant makes an allegation of misconduct, in confidence, in writing to the PVC R&KE. If the PVC R&KE is the Complainant or the Respondent or is personally associated with the work to which the allegation relates or has any other conflict of interest, they will instead refer the allegation to the Vice Chancellor who will notify the Complainant accordingly.

The Complainant should provide a detailed statement in support of the allegation, providing a summary of the allegation along with any other information and enclosing any supporting evidence. A person making an allegation or complaint will not be penalised if it is done without malice and in good faith, reasonably believing it to be true.

Complainants will normally put their name to any allegations they make. However, it is recognised that complainants can be concerned about revealing their identity. Anonymous allegations raised, or matters identified where there is no specific complainant, will be considered at the discretion of the PVC R&KE, taking account of the seriousness of the concerns raised and the likelihood of confirming the concerns from alternative sources/ evidence. Where appropriate, advice will be sought, and consideration given to whether the respondent will be able to defend themselves.

The PVC R&KE will acknowledge receipt of an allegation by the Complainant in writing, informing them that the allegation will be considered initially under the 'Receipt of Allegations' stage of the Procedure. A copy of the Procedure will be provided to the Complainant.

The PVC R&KE will inform the Research Integrity Manager in confidence that an allegation of misconduct in research has been received and may seek advice regarding the use of this Procedure. They may also seek confidential legal or other expert advice.

The PVC R&KE will assess the allegation(s), considering the information provided and any additional information they require to form a conclusion.

They may decide that it is necessary to contact the Complainant to seek information or ask questions to carry out the above review. Such contact should be in writing.

The PVC R&KE will also determine whether the allegation(s) and/or the research project(s) in question concern situations that require immediate action to prevent further risk or harm to staff, research participants or other persons, suffering of animals or negative environmental consequences (where this might contravene the law or fall below good practice). If so, then they will take immediate appropriate action to ensure that any such potential or actual danger/illegal activity/risk is prevented/eliminated. It may be necessary to notify legal or regulatory authorities or relevant professional bodies, and/or relevant partner organisations, publishers, and funders. The Respondent may also need to be informed when carrying out any such actions whether because they will be involved in some or all the actions and/or because they will become aware of them.

The PVC R&KE will also determine whether the research project(s) to which the allegation relates includes legal or contractual obligations that require the university to undertake prescribed steps in the event of an allegation(s) of misconduct in research being made, such as making reports to a regulatory or a funding body and take any actions necessary. Such obligations might be in:

- a) a contract/agreement or guidance on research conduct from a regulator/funding body.
- b) a partnership contract/ agreement/ Memorandum of Understanding; or
- c) an agreement to sponsor the research.

The PVC R&KE will then ensure that all legal or contractual obligations are carried out by the university, seeking advice from human resources and/or Registry Services, Research Services, legal etc. It may be necessary to inform the Respondent when carrying out any such legal or contractual obligations.

Possible Outcomes

At the conclusion of the Receipt of Allegations stage, the PVC R&KE will determine whether the allegation of misconduct in research (more than one course of action may need to be followed):

- a) falls under the definition of research misconduct and the scope of the Procedure and should advance to the Initial Investigation Stage of this Procedure.
- b) falls within the scope of another formal process of the university and warrants referral directly to it, including but not limited to research degree regulations, transparency policy.
- c) warrants referral directly to an external organisation, including but not limited to the research organisation(s) under whose auspices the research in question took place; statutory regulators; or professional bodies, the latter being particularly relevant where there are concerns relating to Fitness to Practice.
- d) presents as being related to potential poor practice rather than to misconduct, and therefore the initial approach to addressing the matter will be via informal measures, such as education and training, mediation, or other non-disciplinary approach, rather than through the next stage of the Procedure or other formal processes; or
- e) should be dismissed because it does not fall under the remit of the Procedure and does not need to be referred elsewhere.

Conclusion of This Stage and Next Steps

The PVC R&KE shall write a note summarising their assessment of the allegation(s) and inform other organisational contacts as appropriate of the next steps from the outcomes.

Where the outcome determined is (a), that it should proceed to the initial investigation, they will inform the Respondent of the following, formally and in writing:

- 1) An allegation of misconduct in research has been made which involves them.
- 2) A summary of the allegation(s) and a copy of the Procedure.
- 3) That it has been determined at the Receipt of Allegations stage that the matter has sufficient substance and falls under this procedure and therefore will proceed to the 'Initial Investigation' stage.
- 4) That they will be allowed to respond to the allegation(s) and set out their case.
- 5) The conclusions of the initial assessment of the allegation(s), an outline of the next steps and approximate timescales.
- 6) When allegations have been made against more than one Respondent, the PVC R&KE should inform each individual separately and not divulge the identity of any other Respondent.

The PVC R&KE will then inform the Complainant, formally and in writing, of the conclusions of the review of the allegation(s) and an outline of the next steps.

7. Formal Misconduct Procedures

The Respondent, Complainant and any witnesses involved in the Initial Investigation stage or the Full Investigation stage may:

- a) If they are university staff or students, be accompanied to interviews by a friend, colleague, trade union or student union representative when invited to attend interviews,
- b) If they are external to the university, be offered the right to be accompanied by a friend.
- c) seek advice and assistance from anyone of their choosing.

Stage 2: Initial Investigation

The purpose of the Initial Investigation Stage is to determine whether there is sufficient evidence of research misconduct to warrant a Full Investigation of the allegation or whether alternative action(s) should be taken.

Timescale

The Initial Investigation Stage should be completed within **30** working days following instruction from the PVC R&KE provided this does not compromise the Principles of this Procedure and the full and fair investigation of the allegation. Any delays to this timescale will be explained to the Complainant, the Respondent and the PVC R&KE in writing, presenting an estimated date of completion.

Process

The PVC R&KE will as soon as is practicable, appoint an Investigator to undertake an Initial Investigation into the allegation(s). The Investigator will be an experienced member of academic staff from within the university and may be from within or outside the department concerned, depending on the circumstances of the investigation.

All persons appointed to carry out the investigation will confirm to the PVC R&KE in writing that:

- a) Their participation involves no conflict of interest,
- b) They will abide by the Procedure.
- c) They will respect the confidentiality of the proceedings; and
- d) They will adhere to the Principles and Standards of the Procedure.

The Respondent and Complainant may raise with the PVC R&KE concerns that they may have about the person chosen to carry out the Initial Investigation but neither has a right of veto over those nominated. The PVC R&KE will consider any concerns raised and whether new persons should be selected to carry out the Initial Investigation Stage.

In the event of the Investigator becoming unable to participate in the Initial Investigation Stage once it is underway, the PVC R&KE will determine whether a new person should be selected to take on the role of the Investigator and continue the investigation from its current point or if the Initial Investigation Stage should be restarted.

The PVC R&KE will provide the Investigator with all relevant information including any correspondence and information already provided in support of the allegation(s). The Investigator

will keep a full record of the evidence received and of the proceedings and should be supported in this by the Research Integrity Manager and any other support identified.

The Investigator will then contact the Complainant and the Respondent to gather information in support of their investigation.

The Investigator will invite a response within a specified timeframe, while maintaining the anonymity of the Complainant. The Respondent shall confirm receipt and provide a response in writing.

The Investigator shall assess the information obtained and any additional information they require. The work of the Investigator will include the determination of whether the allegation is made in good faith; a confidential review and assessment of the evidence provided; and reaching a conclusion on the allegation(s) in line with the possible outcomes.

As part of the process, in the interests of fairness and impartiality and to help ensure confidence in the process, both parties should have the opportunity to provide input into the investigation whether in writing or by interview. When interviewed, the Respondent will be allowed to respond to the allegations made against them.

The Investigator may also contact relevant witnesses suggested by the Complainant or Respondent. Care should be taken not to miss opportunities to gather relevant evidence. Where the Complainant has raised an allegation relating to a large body of work, or work carried out over a significant period, the Investigator will need to carry out a sufficient investigation to reach a robust conclusion on the allegation(s). This can take time and resources, and advice should be sought from the PVC R&KE on how to best approach this.

Possible Outcomes

after the Initial Investigation Stage, the Investigator will determine whether the allegation of misconduct in research:

- a) is sufficiently serious and has sufficient substance to warrant a Full Investigation; or
- b) has some substance but due to its relatively minor nature or because it relates to poor practice rather than to misconduct, will be addressed through education and training or another non-disciplinary approach, such as mediation, rather than through the next stage of the Procedure or other formal processes; or
- c) warrants referral directly to another formal process, including but not limited to research degree regulations, academic misconduct process, transparency policy, warrants referral directly to an external organisation, including but not limited to statutory regulators or professional bodies, the latter being particularly relevant where there are concerns relating to Fitness to Practise; or
- d) is unfounded, because it is mistaken or is frivolous or is otherwise without substance (this could include difference of opinion on methodology), and will be dismissed; or
- e) is unfounded, because it is vexatious and/or malicious, and will be dismissed.

Conclusion of this Stage and Next Steps

The Investigator shall write a report of (where relevant, for each allegation) the outcome. The standard of proof used by the Initial Investigation is that of "*on the balance of probabilities*". This means that the activity was more likely than not to have occurred.

The Investigator will then submit their final report and records/material relating to the investigation to the PVC R&KE, setting out the conclusions of the Initial Investigation stage on the allegation(s) under investigation and any other matters they wish to draw to the attention of the university.

The PVC R&KE shall convey the substance of the Investigator's findings to the Complainant, the Respondent and such other persons or bodies as they deem appropriate.

The PVC R&KE will then undertake the following actions depending on the conclusions of the Initial Investigation stage on the allegation(s) under investigation:

If it is concluded that the allegation(s) is sufficiently serious and has sufficient substance to warrant a Full Investigation of the complaint, then the investigation moves to the Full Investigation stage).

The PVC R&KE will inform the Complainant and the Respondent, formally and in writing that the Procedure has moved to the Full investigation stage and that they will be interviewed as part of the process and allowed to provide evidence. They will also be informed that they may be accompanied to any meetings by a friend, colleague, or Trade Union representative.

The work of the Investigator is then concluded, and they play no further role in the Procedure or any subsequent disciplinary procedure, apart from clarifying any points in their report. As the matter may then give rise to disciplinary or other action, a former Investigator should not make any comment on the matter in question, unless formally permitted by the Organisation or otherwise required to by law. They should also remember that all information concerning the case was given to them in confidence.

Any queries or requests for comment addressed to the Investigator should be referred to PVC R&KE.

Stage 3: Full Investigation

The purpose of the Full Investigation is to review all the relevant evidence and conclude whether an allegation of misconduct in research is upheld in full, upheld in part or not upheld; and make recommendations as appropriate, regarding any further action deemed necessary to address any misconduct found.

Given the quasi-judicial nature of this stage and the human resource implications, both the University Secretary and the Director of Human Resources should be informed in confidence.

In serious cases the question of suspension may need to be addressed, but this should only arise where the presence of an individual is likely to hinder an investigation or where it would be difficult to perform their duties while this stage of an investigation is being conducted.

Possible Outcomes

After the Full Investigation, the Panel will conclude, giving the reasons for its decision and recording any differing views, whether the allegation of misconduct in research is:

- a) is upheld in full; or
- b) is upheld in part; or
- c) has some substance but due to its relatively minor nature or because it relates to poor practice rather than to misconduct, will be addressed through education and training or another non-disciplinary approach, such as mediation, rather than through the next stage of the Procedure or other formal processes.

The Panel may also make recommendations, for consideration by the PVC R&KE, regarding any further action(s) to be taken by the university to address any misconduct the Full Investigation may have found; correct the record of research, and/or address other matters uncovered.

Timescale

The Panel will normally reach its conclusions within three months of being established, provided this does not compromise the Standards and Principles of this Procedure and the full and fair investigation of the allegation. Any delays to this timescale will be explained to the Complainant and Respondent in writing, presenting an estimated revised date of completion.

Process

The PVC R&KE shall, as soon as is practicable, appoint a Full Investigation Panel ("the Panel") to undertake a Full Investigation into the allegation(s).

The Research Integrity Manager will provide administrative and other support to assist the Panel.

The Panel will normally consist of three people, with the necessary expertise to examine the evidence, interview witnesses and conduct the investigation. Depending on the circumstances of the investigation, the Panel may consist of a greater number of people, for example, to ensure that

it contains sufficient expertise or diverse perspectives to reach a thorough and fair conclusion on the allegation(s) under investigation.

At least one member of the Panel shall be from outside the university, as required by The Concordat to Support Research Integrity. The Panel may include multiple external members. This may be advantageous when allegations involve multiple disciplines of research and/or are especially complex and can help ensure the process is transparent, rigorous, and fair.

At least two members of the Panel shall be academic specialists in the general area within which the misconduct is alleged to have taken place, and where allegations concern highly specialised areas of research the Panel should have at least one member with specialised knowledge of the field. Such specialists can be drawn from within the university, bearing in mind the conflict of interest requirements, or from the Panel's external member(s).

For allegations that involve staff on joint clinical/honorary contracts it may be helpful to include representation from the other employing Organisation(s). In these circumstances, they are not classified as external members of the panel.

The PVC R&KE will select one of the members of the Panel to act as its Chair. In the event of the Chair becoming unable to participate in the Full Investigation Stage once it is underway, the PVC R&KE will select a new Chair from the members of the Panel and then consider the overall membership of the Panel. The Chair may be selected from the Panel's external members; this can help reassure involved parties that the investigation process will be transparent, thorough, and fair.

All persons appointed to carry out the Full Investigation, will confirm to the Pro-Vice Chancellor Research & KE that:

- Their participation involves no conflict of interest.
- They will abide by the Procedure.
- They will respect the confidentiality of the proceedings and data protection requirements.
- They will adhere to the Principles and Standards of Procedure.

The Respondent and Complainant may raise with the PVC R&KE concerns that they may have about those chosen to carry out the Full Investigation but neither has a right of veto over those nominated. The PVC R&KE will consider any concerns raised and whether new persons should be selected to carry out the Full Investigation Stage.

Prior to the convening of the panel the respondent shall be invited to explain any apparent inconsistencies or irregularities in a written response. This process shall maintain the anonymity of the Complainant and the Respondent.

The evidence to be considered will normally include documentation including, but not limited to, relevant research data materials, proposals, publication, correspondence, and memoranda.

The Chair will keep a full record of the evidence received and of the proceedings and should be supported in this by the Research Integrity Manager.

The Research Integrity Manager will provide the Chair and each member of the Panel with:

- a) a copy of this Procedure.
- b) details of the allegation(s) which will be considered under the Full Investigation stage.
- c) a copy of the PVC R&KEs note of the Receipt of Allegations stage.
- d) a copy of the report of the Initial Investigation stage.
- e) other records from the Initial Investigation stage as deemed relevant by the PVC R&KE.
- f) names and contact details of the Complainant(s) and the Respondent(s).
- g) a summary of correspondence with the Complainant(s) and the Respondent(s) to date; and
- h) a summary of any evidence secured during the Receipt of Allegations stage or Initial Investigation stage.

The Chair of the Panel will be responsible for the conduct of the proceedings during the Full Investigation. The Panel does not have any disciplinary powers. The Panel shall decide its way of working based on the provisions of this stage of the Procedure and the information that it has been given, as to what information it needs and whom it wishes to interview/ take statements from in addition to the Complainant and the Respondent, who must be interviewed.

When making any decisions about the conduct or conclusion of the Full Investigation, the Panel will attempt to reach a consensus by discussion.

The Panel shall assess the evidence provided and any additional information they require.

As part of its work, the Panel must separately interview the Complainant and the Respondent. Where there are multiple Complainants and/or Respondents, each must be interviewed separately.

When interviewed, the Respondent will be allowed to respond to the allegations made against them, set out their case and submit their evidence for consideration by the Panel, before interview. They can also suggest witnesses for the Panel to interview; the Panel may then choose to invite the suggested witnesses to interview.

The Panel should also interview relevant witnesses; these can include witnesses suggested by the Complainant or Respondent.

Where the Complainant has raised an allegation relating to a large body of work, or work carried out over a significant period, the Panel will need to carry out a sufficient investigation to reach a robust conclusion on the allegation(s). This can take time and resources, and advice should be sought from the PVC R&KE on how to best approach this.

Conclusion of this stage and next steps:

The panel should conclude its investigation with the production of a final report which will:

- Summarise the conduct of the investigation.
- State the outcome of the investigation, giving reasons for its decision and recording any differing views.
- Make recommendations regarding any further action(s) which should be taken.
- Address any procedural matters that the investigation has brought to light within the university and/or any partner organisations or funding bodies.

The standard of proof used by the Full Investigation is that “on the balance of probabilities.” This means that the activity was more likely than not to have occurred.

The Panel will submit their final report to the PVC R&KE. The Chair and Panel will also hand over all records/ material relating to the Full Investigation.

The PVC R&KE shall convey the substance of the Panel's findings and recommendations to the Complainant, the Respondent and such other persons or bodies as they deem appropriate.

The work of the Panel is then concluded, and the Panel should be disbanded. As the matter may then give rise to disciplinary or other action, the Chair and members of the disbanded Panel should not make any comment on the matter in question, unless formally requested by the university or otherwise required to by law. They should also remember that all information concerning the case was given to them in confidence.

The Full Investigation stage is complete, and the Procedure moves to the relevant section of the Outcomes and reporting stage.

Those who have contributed to the disbanded Panel should have no further involvement in the Procedure unless formally asked to clarify a point in their written report at a subsequent stage or as part of any subsequent action or process. A role as Chair or member of the Panel rules out participation in any subsequent disciplinary or other processes.

8. Outcomes and Reporting

Possible Outcomes

The PVC R&KE is responsible for ensuring that any necessary actions are carried out after the investigation is completed. In general terms, these actions may include:

- a) Actions relating to the operation and conclusion (subject to any subsequent appeal) of this Procedure, including appropriate transfers of information to any subsequent university processes or informal measures, and/or to any relevant processes of external organisations.
- b) Reporting the outcomes to relevant colleagues/ bodies within the university, for example, line managers, Human Resources, University Research Committee, Academic Board.
- c) Making necessary disclosures on the outcomes of uses of the Procedure to external organisations and other interested parties.
- d) Duty of care to Complainants, Respondents, and other involved parties, including but not limited to research participants.
- e) Ensuring that appropriate efforts are made to correct the research record.
- f) Addressing procedural or organisational matters uncovered during the investigation.

Timescale

This will vary depending on the scale of action needed, but the PVC R&KE should aim to ensure they are completed within three months of completion of the investigation.

Process

The PVC R&KE working with the Research Integrity Manager, and with others as necessary, should take any further action(s) they deem necessary to: address any misconduct the investigation may have found; correct the record of research, and/or address other matters uncovered during the course of the investigation.

Such recommendations might include but are not limited to:

- a) whether following the conclusion of the operation of this Procedure, the matter should be referred to the relevant disciplinary procedure; and/or
- b) whether following the conclusion of the operation of this Procedure, the matter referred to another relevant process, such as the examination regulations, academic misconduct process or equivalent or the financial fraud investigation process; and/or
- c) what individuals and/or departments within the university should be notified of the findings of the investigation, such as line managers, Human Resources and/or Student Services, a central committee with responsibility for research quality, or equivalents; and/or
- d) what external organisations should be informed of the findings of the investigation, with appropriate confidentiality, such as statutory regulators, relevant funding bodies, partner organisations and professional bodies, the latter being particularly relevant if concerns relate to Fitness to Practice; and/or
- e) informing research participants and other involved parties; and/or
- f) whether any action will be required to correct the record of research, including but not limited to informing the editors of any journals that have published articles concerning

- research linked to an upheld allegation of misconduct in research and/or by a person against whom an allegation of misconduct in research has been upheld; and/or
- g) whether procedural or organisational matters should be addressed by the Organisation or other relevant bodies through a review of the management of research and other measures as appropriate; and/or
 - h) other matters that should be investigated, including allegations of misconduct in research which are either unrelated to the allegation in question or alleged to have been committed by persons other than the Respondent and/or other forms of alleged misconduct; and/or
 - i) communication of anonymised summary data on uses of this Procedure within a specific period. This includes reporting required in the Annual statement on research integrity required under The Concordat to support Research Integrity, reports to relevant central committees/ departments within the Organisation, and dissemination of anonymised learning points within the Organisation as appropriate.

When considering the above, the PVC R&KE and the Research Integrity Manager should take into account any recommendations on such actions made by the Full Investigation Panel and any need to involve other elements of the university (for example, line managers, Human Resources, URC, Research Services, Registry Services, etc.) and/or external bodies (for example, partner organisations, publishers, funders, regulatory bodies, etc.) in carrying out agreed actions.

Actions required following the conclusion that the allegation(s) is unfounded because it is mistaken or is frivolous or is otherwise without substance:

- a) The PVC R&KE shall take appropriate steps to preserve the good reputation of the Respondent. If the case has received any adverse publicity the respondent may be offered the opportunity to have an official statement released by the university.
- b) Those who have raised concerns/ made allegations in good faith will not be penalised and the PVC R&KE shall take appropriate steps to preserve the good reputation of the Complainant.

Actions required following the conclusion that the allegation(s) is unfounded because it is vexatious and/or malicious:

- a) The PVC R&KE may consider recommending that action be taken where there is clear evidence that a complaint was vexatious and/or malicious. This may include disciplinary action.
- b) The PVC R&KE shall take appropriate steps to preserve the good reputation of the respondent. If the case has received any adverse publicity the Respondent may be offered the opportunity to have an official statement released by the university.

Actions required following the conclusion that the allegation(s) warrants referral directly to another formal process of the Organisation:

Where this is necessary, the PVC R&KE will inform the Complainant in writing of:

- a) the reasons why the allegation cannot be investigated using this Procedure
- b) which process for dealing with complaints is appropriate for handling the allegation; and

- c) that the allegation will be referred to the relevant department/ process.

Actions required following the conclusion that the allegation(s) warrants referral directly to an external organisation:

When the PVC R&KE has determined that the allegation does not relate to researchers or research under the auspices of the university, they will inform the Complainant, in writing, of:

- a) The reasons why the university is not an appropriate body to investigate the allegation.
- b) Which external organisation(s) might be an appropriate body to investigate the allegation.
- c) Relevant information relating to contacting the external organisation(s).

When the PVC R&KE has determined that, while the allegation does relate to researchers or research under the auspices of the university, the allegation warrants referral directly to an external organisation, they will:

- a) Contact the relevant external organisation(s), in writing, to inform them of the allegation and ask them to investigate or otherwise address it. The PVC R&KE should also explain why the university has concluded that the allegation warrants referral directly to the external organisation in question.
- b) Inform the Complainant, in writing, that the allegation is being referred directly to the external organisation(s) in question and provide them with relevant information so that they can contact the external organisation(s) if they wish.

Actions required following the conclusion that the allegation(s) has some substance but due to its relatively minor nature or because it relates to poor practice rather than to misconduct, will be addressed through education and training or other non-disciplinary approaches:

The PVC R&KE shall ensure that the relevant education and training or other informal measures are provided either directly or by referring the matter to the relevant department.

Actions required following the conclusion that the allegation(s) is upheld in full or in part:

The PVC R&KE in conjunction with relevant colleagues should decide whether the matter should be referred to the university's disciplinary process or for other formal actions.

- a) The report of the Full Investigation Panel should form the basis of the evidence that the disciplinary panel receives.
- b) Relevant information collected and brought to light through the Procedure should be transferred to the disciplinary process.

The PVC R&KE should take such steps as are appropriate, given the seriousness of the allegations, to support the reputation of the Complainant and, if the allegation has been upheld in part rather than in full, the Respondent as appropriate, and any relevant research project(s).

Following the conclusion of the Procedure, the PVC R&KE may need to recommend further measures in addition to those that may be taken by way of the disciplinary process.

Potential actions may include, but are not limited to:

- a) Recommendations for retraction/correction of published research, via notification of

findings to editors/ publishers.

- b) withdrawal/repayment of funding.
- c) notifying research participants and other involved parties.
- d) notification of findings to relevant employers, statutory, regulatory, professional, grant-awarding bodies or other public bodies with a relevant interest.
- e) notifying other employing organisations.
- f) notifying other organisations involved in the research.
- g) adding a note of the outcome of the investigation to a researcher's file for any future requests for references.
- h) review internal management and/or training and/or supervisory procedures for research.
- i) revocation of any degrees awarded based on research that is the subject of a research misconduct finding.
- j) Where an investigation has established research misconduct relating to a significant body of work over some time, the university will consider whether it needs to review other work carried out by the individual or individuals concerned, including work not specifically flagged up in the course of the investigation.

Conclusion of this Stage and Next Steps

The Complainant and Respondent will be informed of:

- a) The actions arising from this stage of the Procedure and any relevant actions arising from earlier stages and, where relevant, the contact points for any follow-up communications regarding those actions.
- b) The options for appeal open to them.
- c) They should also be informed that, unless an appeal is raised, the investigation and the use of this Procedure have now concluded.

A role as the Pro-Vice Chancellor Research & KE or Research Integrity Manager rules out participation in any subsequent disciplinary process.

9. Appeals Process

The purpose of the appeals process is to permit the Complainant or the Respondent to appeal against the outcomes, decisions and/or recommendations carried out under this Procedure.

Grounds for Appeal

Appeals may be permitted on any or all of the following grounds:

- a) Procedural irregularity in the conduct of the investigation up to and before the Appeal Panel that could have had a material impact on the outcome.
- b) Fresh evidence becoming available which was not available during the investigation.
- c) Evidence of bias or unfairness in the process or decisions taken.
- d) The recommendations made as part of an outcome of the Procedure/ subsequent actions are either excessive or inadequate in relation to the misconduct found by the investigation.

Any appeal shall be made in writing to the Vice Chancellor within 10 working days of being notified of the outcome of the Procedure. The written notice of appeal shall set out the grounds of appeal, and be accompanied, wherever possible, by supporting documentation.

Possible Outcomes

The Appeals Panel has the power to uphold, reverse or modify the following outcomes of the Procedure, including the decisions and/or recommendations associated with them:

- a) A conclusion that an allegation is unfounded because it is mistaken or is frivolous or is otherwise without substance and will be dismissed.
- b) A conclusion that an allegation is unfounded because it is vexatious and/or malicious and will be dismissed.
- c) A conclusion that an allegation has some substance but due to its relatively minor nature or because it relates to poor practice rather than to misconduct, will be addressed through education and training or other non-disciplinary approaches, such as mediation, rather than through the next stage of the Procedure or other formal processes.
- d) A conclusion of a Full Investigation that an allegation is upheld in full.
- e) A conclusion of a Full Investigation that an allegation is upheld in part.

Timescale

Any appeal should be heard within two months of the outcome of the original investigation. Any delays to this timescale will be explained to the Complainant and the Respondent in writing, presenting an estimated revised date of completion.

Process

The Vice Chancellor will assess the appeal to determine whether it falls within one or more of the grounds for appeal, seeking clarification from the person(s) submitting the appeal as necessary.

If the appeal does not fall within the grounds for appeal, it is dismissed, and this decision should be communicated to the appellant. The Appeals stage now ends.

If the appeal does fall within the grounds for appeal, the Vice Chancellor shall then, as soon as is practicable, appoint an Appeals Panel to undertake the appeals process.

The Appeals Panel will consist of three people. Depending on the circumstances of the investigation the Appeals Panel may consist of a greater number of people, for example, to ensure that it contains sufficient expertise or diverse perspectives to reach a thorough and fair conclusion. No individual involved in the Appeals Panel will have been involved at any stage previously.

At least one member of the Appeals Panel should be from outside the university. More than one external member may be appointed where the appeal involves multiple disciplines and/or is especially complex.

One member of the Appeals Panel shall be an academic specialist in the general area within which the misconduct is alleged to have taken place (where allegations concern highly specialised areas of research, they should instead have specialised knowledge of the field).

For matters that involve staff on joint clinical/honorary contracts representation from the other employing Organisation(s) may be included. In these circumstances, they are not classified as external members of the panel.

Once convened, the membership of the Appeals Panel should not be changed. If the membership falls below its initial number, the Vice Chancellor will determine whether to recruit additional members and continue the investigation from its current point or restart the investigation.

The Vice Chancellor will select one of the members of the Appeals Panel to act as its Chair. In the event of the Chair becoming unable to participate in the Appeals Stage once it is underway, a new Chair will be selected from the members of the Appeals Panel.

All persons appointed to carry out the Appeals stage, will confirm to the Vice Chancellor that:

- a) Their participation involves no conflict of interest.
- b) They will abide by the Procedure as it affects the work of the Appeals stage.
- c) They will respect the confidentiality of the proceedings.
- d) They will adhere to the Principles and Standards of the Procedure.

Both the Respondent and Complainant may raise with the Vice Chancellor concerns that they may have about those chosen to carry out the Appeals stage but neither has a right of veto over those nominated. The Vice Chancellor will consider any concerns raised and whether new persons should be selected to carry out the Appeals Stage.

The Chair is responsible for keeping a full record of the work of the Appeals Panel and should be supported in this by administrative support identified by the Vice Chancellor.

When making any decisions about the conduct or conclusion of the Appeals Stage, the Appeals Panel will do so by reaching a consensus.

The Appeals Panel will review the conduct of the investigation and any evidence submitted in support of the appeals(s), rather than carry out a re-investigation of the allegation(s) in question.

Conclusion of this Stage and Next Steps

The Appeals Panel will decide whether it upholds, reverses, or modifies the outcome in question, including the decisions and/or recommendations associated with it. The decision of the Appeal Panel is final.

The Appeals Panel shall write a report setting out its conclusions, giving the reasons for its decision and recording any differing views.

A summary of the conclusions will be sent to the Complainant and the Respondent for comment on matters of factual accuracy. The Appeals Panel will consider the responses received and if they consider that the report includes errors of fact, will modify the report as necessary.

The Appeals Panel will then submit their final report to the Vice Chancellor. The Chair will also hand over to the Vice Chancellor all records/ material relating to the Full Investigation.

The Vice Chancellor shall convey the substance of the Appeals Panel's findings and recommendations to the Complainant, the Respondent and such other persons or bodies as they deem appropriate.

The Vice Chancellor will then undertake the actions necessary to implement the conclusions of the Appeals Panel, following relevant provisions of the Outcomes and Reporting stage and liaising with the Research Integrity Manager and others, within and/or external to the university, as necessary.

The work of the Appeals Panel is then concluded, and the Appeals Panel should be disbanded. As the matter may then give rise to disciplinary or other action, the members of the disbanded Appeals Panel should not make any comment on the matter in question, unless formally permitted by the university or otherwise required to by law. They should also remember that all information concerning the case was given to them in confidence.

Any queries or requests for comment addressed to the Chair or members of the Appeals Panel should be referred to the Vice Chancellor.

Membership of the Appeals Panel rules out participation in any subsequent disciplinary or other process, unless formally asked to clarify a point in their written report.

10. Contact

For general queries regarding Research Policies, Procedures and guidelines contact Jill Morgan, Research Integrity Manager, by email: J.Morgan4@wlv.ac.uk

VERSION	3.0	AUTHOR/ OWNER	Jill Morgan, Research Integrity Manager, Research Services
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Appendix 1: Resolution using informal measures

One potential outcome of the use of this Procedure is a conclusion that the allegation(s) under investigation has some substance but, due to its relatively minor nature or because it relates to poor practice rather than to misconduct, will be addressed through education and training or another non-disciplinary approach.

There are many types of informal measures, and they can be applied to many potential situations. Those operating this Procedure will need to determine what informal measures follow the outcome of a particular investigation.

The Pro-Vice Chancellor Research & KE and/or Research Integrity Manager may need to seek advice from colleagues to determine the best course of action and can also contact UKRIO.

Decisions made concerning the implementation of informal measures, and the reasoning behind those decisions, should be recorded in brief, in case they need to be referred to at a later date.

Informal measures can take many forms and some examples are given below. This list should not be taken as exhaustive, and other informal measures may be needed for the situation in question.

- Education, training and other development activities.
- Enhanced supervision/ oversight of research activities.
- Restriction of research activities.
- Mentoring.
- Mediation between involved parties.
- Awareness-raising of relevant issues of good research practice.
- Pastoral care and support.
- Revision of relevant research practices, systems and/or policies relating to the allegation(s) in question. Such revision may be limited to a particular team or have a wider scope, covering a department or the entire organisation, and should be supported by appropriate training and awareness-raising.

The audience of the informal measures can also vary - Respondents, Complainants, other involved parties, other researchers and/or professional services staff within the university. Different informal measures may well be needed for different people. The implementation of some informal measures may require the involvement of other organisations and/or making disclosures to them.

Implementing Resolution Using Informal Means

Six key features of an effective system of resolution using informal measures are:

- 1) **Defined:** the nature and scope of the informal measures should be defined in writing. This should be communicated by the Pro-Vice Chancellor Research & KE to the persons involved, and including those who will be responsible for carrying out the informal measures. If communications with external persons or organisations are required, this would normally be carried out by the Pro-Vice Chancellor Research & KE on behalf of the university.
- 2) **Designated Person:** the university should determine who will carry out and/or oversee the informal resolution, what resources will be made available to support them, and to whom they will give updates on the progress of the informal resolution.

The person designated to carry out the informal measures can also request implementation of formal measures instead, and this should be considered by the Pro-Vice Chancellor Research & KE.

- 3) **Duration:** the duration of informal measures should be set out at the onset, including a proposed start date, and communicated to all involved parties. The designated person should make the Pro-Vice Chancellor Research & KE aware via the Research Integrity Manager if there is a significant delay in starting or completing the informal measures.
- 4) **Delivery:** Given their nature, informal measures can be vulnerable to delays and/or a lack of engagement from involved persons, whether an individual (e.g., Complainant and/or Respondent) or a department within the university. The aim is the delivery of the informal measures as defined and progress should be measured, in a light- touch way, against their agreed nature and scope.

Care must be taken to ensure that agreed actions are delivered and the designated person must be given support by the Pro-Vice Chancellor Research & KE, the Research Integrity Manager and/or others, as needed.

- 5) **Documentation:** the informal nature of these measures does not mean that no records should be kept. Brief notes should be kept on: the nature and scope of the informal measures; who has responsibility for their delivery; the proposed and actual duration of the measures; and their delivery and associated outcome(s).

When informal measures are concluded, involved parties (e.g., Complainant and/or Respondent; Pro-Vice Chancellor Research & KE and/or Research Integrity Manager; line managers/ supervisors; Human Resources or Registry Services) should be informed in writing, summarising the delivery and outcome(s) and any next steps.

- 6) Once completed, there should be **discussion** with the Research Integrity Manager and others about any learning points for the university.

Appendix 2: Research Misconduct Process

