

**June 2022**

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**RESEARCH INTEGRITY POLICY**

## Introduction

At Nesta we recognise that our team members are motivated to do high quality research projects that have a meaningful social impact.

This policy sets out the ways in which we support best practices and our expectations for standards in this area, guided by the [research integrity concordat \(PDF, 375KB\)](#)<sup>1</sup>.

We also set out how we manage conflict of interests and define and address misconduct in research. We started with details of how we address research misconduct because it is a funder requirement, however, this is a living policy document and we plan to update it with guidance on the positive aspects of research integrity, such as how we encourage transparency and co-production in research. When we add these updates we will let people know via our organisational communications channels.

We have drawn extensively on material from the research integrity concordat in creation of this guidance, and encourage all Nesta staff members to read this document. This policy is not exhaustive. If in doubt, individuals are expected to comply with the spirit of the policy as well as its content.

As we are governed by UK charity law, we ensure our research is compliant with UK legal frameworks, however we also recognise the importance of ensuring our work respects local guidelines and frameworks (e.g. in the devolved administrations).

This policy should be read alongside the Nesta [code of conduct](#), the Nesta [whistleblowing policy](#) and Nesta [disciplinary policy and procedure](#).

It is the responsibility of each individual covered by this policy to observe its terms. Leaders whose team(s) carry out research (e.g. Mission Directors, Practice Directors) should ensure projects carried out by their teams are compliant with the Research Integrity policy and any associated processes. If you are in any doubt about the application of this policy, please discuss with your line manager or the Chief Scientist.

## Who does this policy apply to?

This policy applies to everybody who oversees or carries out research activities at/with Nesta. Broadly, research is any systematic activity that is designed to help us learn more about a topic or to answer specific questions. Common examples of research activities at Nesta include literature reviews/meta-analyses, interviews with stakeholders, secondary data analysis (including descriptive statistics), primary data collection and analysis, rapid prototyping. We consider most of the project work that

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<sup>1</sup> The Concordat to Support Research Integrity is a Universities UK document outlining a national framework for good research conduct and its governance.

Practices and Missions do to be research by default. We recommend that in most cases you should treat any investigative project as research, but if you are not sure whether your project counts as research please check in with the Chief Scientist Office for a discussion.

### **What do we mean by research integrity?**

We adopt the UKRI definition of Research Integrity:

*“High research integrity means upholding the values of honesty, rigour, transparency and open communication, care and respect for those involved in research. It supports accountability for a positive research environment.”* [\[UKRI, 2021\]](#).

At Nesta we want to ensure that we all use best practices that uphold integrity in our research and innovation. We are committed to fostering an approach that goes beyond prevention of harm or legal compliance (although these are important) to critically thinking and acting in ways that ensure our work embodies these values.

We promote respect and care in the conduct of research projects by using our risk management processes to think critically about the safety and wellbeing of our researchers, any users/research participants involved in our research and beneficiaries. These risks and any mitigations are documented as part of the scoping process and can be updated throughout the project lifespan.

Respect and care means we seek views and opinions from those likely to be affected by our research and innovation work, and that we consider inclusion, diversity and equity when making decisions about sampling and research design. We also pay special attention to the impact that poor quality, non-replicable research might have on vulnerable groups and on society more generally.

### **How we will support teams to adhere to this policy**

This policy will be supported and implemented through integration into our processes (e.g. the Mission Machine, onboarding) so that it can be used by all Nesta teams to ensure they have complied with all relevant legal or institutional policies (e.g. data protection), as well as providing them with a framework and resources for working through project- or domain-specific ethical and moral questions. Some of these processes are in development but the resources we have up-and-running already can be found [below](#). We will publicise updates as they become available.

Nesta promotes individual and group-learning and encourages staff to seek, take advantage of, share and enhance the many available learning opportunities. This is reflected in the [Capability Framework](#), which is identified as “*the foundation for*

Nesta's learning curriculum", and outlined in detail in the [learning philosophy and learning and development strategy](#).

### **Conflict of interest in research**

We acknowledge the existence of multiple, and sometimes divergent interests of staff and stakeholders involved in planning and carrying out research at/with Nesta. For example, there might be a conflict between financial gain and rigorous completion and reporting of a research study, or surrounding the unbalancing of the [charitable objects](#) following the requests of a large investor for a programme that does not appear to be entirely aligned with Nesta's values and objectives.

The Nesta Group [conflicts of interests policy](#) states:

*"A conflict of interest could arise in any transaction or situation where an individual's interests could, or could be perceived to, prevent that individual from making decisions only in the best interests of the Company. Even the perception of a conflict of interest can cause reputational damage. "*

Staff must identify and take steps to address any potential or actual conflicts of interest arising in research so that we:

- maintain the highest ethical standards of research integrity
- minimise bias in conduct and interpretation of research
- can use the outputs of our research to achieve the greatest possible public benefit.

Leaders coordinating research activity with any external partners, or partners from the wider Nesta Group, must ensure those engaging with Nesta are made aware of Nesta's conflict of interest and research integrity policies (for example, these could be shared by email or included in a memorandum of understanding with the partner).

Potential or actual conflicts of interest relating to research can be noted on scoping documents that are submitted to [Emerald](#) for review (and updated later if needed). It is also considered best practice to report conflicts of interest declarations on reports or publications arising from research projects.

Refer to the Nesta Group [conflicts of interests policy](#) for further guidance on the matter. Actions in case of breach are outlined in the following section on research misconduct.

## Research misconduct

At Nesta we expect principles of good research conduct to be applied across all our research projects. Our definition of research misconduct covers a range of behaviours that compromise the integrity of projects. Some common forms of misconduct include:

- **Fabrication:** making up data, results, participant consent documents etc.
- **Falsification:** inappropriately manipulating and/ or selecting data, images, recordings
- **Plagiarism:** using other people's work, IP or ideas without permission or without appropriate acknowledgement
- **Failure to meet:** legal, ethical and professional obligations, e.g.
  - Failure to obtain appropriate informed consent
  - Breach of duty of care for research participants
  - Failure to comply with the [UK Data Protection Act/GDPR](#)
  - Failure to disclose conflicts of interest
- **Misrepresentation of:**
  - **Data**, including suppression of relevant results or knowingly, recklessly or by gross negligence presenting flawed interpretation of data
  - **Involvement**, including inappropriate claims to authorship, or exclusion or denial of authorship to those who have contributed
  - **Interests**, including failure to declare competing interests of researchers or funders
- **Improper dealing with allegations of misconduct**
  - retaliation against whistleblowers
  - cover-ups of misconduct.

We don't include honest mistakes in our definition of misconduct. We also recognise that differences in methodology, approach or interpretation do not constitute research misconduct. We aim to create a culture where we learn from mistakes and correct the record if we have published erroneous findings.

## How we handle research misconduct at Nesta

We are proactive in promoting good conduct and disincentivising poor conduct across all of our research projects.

We do this through several different mechanisms, for example:

- [ERIN Toolkit](#) - supports project teams to engage with moral and ethical issues arising from their research
- [Emerald](#) review process - encourages peer feedback on project plans and sharing of best practices

- [Trial documentation](#) - encourages transparency, feedback from peers and disincentivises bad research practices like p-hacking, post-hoc testing, selective data presentation etc.
- [The Open Science Framework](#) - provides an open access platform to share research documents (trial documentation, data where possible/appropriate, methodological notes, reports, preprints, ...); Nesta is a member of the OSF Institutions program
- **Practices x Discovery Hour seminars** - encourages and supports teams to stay up to date with methodological developments
- [Learning and development opportunities](#) - helps individuals to build their professional research expertise according to their needs, supports a baseline level of research literacy at Nesta.
- **Clear project roles** - this is a work in progress but monitoring research integrity should be an allocated responsibility in any research project that we run. We will clarify this as the Nesta Way project develops.

Ultimately individuals are responsible for their own conduct, but we aim to create an environment that minimises the likelihood of research misconduct through the following controls:

- **The Chief Scientist** is ultimately responsible for ensuring appropriate policies, practices, learning opportunities and organisational culture are in place to support good quality in research and innovation
- **Senior Leaders<sup>2</sup>** are responsible for:
  - ensuring appointed staff have appropriate skills and training for their level of responsibility
  - designing projects and programmes in a way that ensures there is enough time and resource to minimise the risks of misconduct and preventable errors
  - supporting staff learning and development through supervision, mentoring and appraisal mechanisms
  - ensuring project leads fulfil their responsibilities in compliance with Nesta ethics, data management and assurance processes
- **Individuals are responsible for:**
  - Reading this policy, finding out how its contents relate to their role and agreeing how to implement this with their line manager
  - Reviewing their capabilities and identifying learning needs in relation to research integrity as part of the employee development planning.

## What to do if you are concerned about research misconduct at Nesta

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<sup>2</sup> Anyone who oversees teams conducting research, e.g. Mission Directors, Practice Directors, Discovery Hub Director.

It's often best to talk to someone directly if you have concerns, for example if you think they have misrepresented data, it could be an honest mistake that can be rectified with a conversation.

However, we recognise that power dynamics and other factors mean that this is not always an option, so concerns should be raised with your line manager, project lead, mission/practice director, anonymously via bob, or the People team if needed.

If your concerns involve your direct supervisors, or if this is your preference, you can also report research misconduct to the Chief Scientist, or the Chief People Officer. You can also take a look at Nesta's [whistleblowing policy](#) for guidance on raising more general concerns.

If you have concerns about research misconduct that involves UKRI funded work, and which cannot be addressed at the organisational level, contact [Research England](#).

### **What should I do if someone reports research misconduct to me?**

If you are a line manager, project lead or director receiving a report about research misconduct, you should discuss the matter confidentially with the Chief Scientist. You should keep the matter confidential, and ask the member of staff reporting to do the same. Confidentiality is important so that we can ensure fair investigations that are as independent as possible.

It is good practice to keep notes about what has been reported to you and the evidence available at the time. Remember that any documents that name an individual can be subject to a [subject access request](#).

### **How will we investigate research misconduct?**

Allegations will be investigated by the Chief Scientist in collaboration with a member of the People Team, usually the Chief People Officer or a suitable deputy. The processes outlined in the Disciplinary Policy and Procedure will apply to a research misconduct investigation, however, the investigation must be led by a suitably qualified person who has research leadership experience. If the Chief Scientist is the subject of a research misconduct allegation, then the CEO will be responsible for appointing suitably qualified persons to lead the investigation.

Investigators will declare any potential or perceived conflicts of interest and recuse themselves if necessary. Allegations of misconduct will be acknowledged and an investigation plan developed within two weeks of the Chief Scientist receiving the allegation.

The investigation will conclude within one month, unless the case is of unusual complexity. If investigations take longer than this the subject of the allegation and the person raising the concern will be notified and given a new date for conclusions to be communicated.

The investigation shall remain confidential to the investigation team and the CEO office while it is being conducted. The investigating team will document their process, evidence and decisions in a confidential place.

If the allegation is upheld then disciplinary action will be taken in accordance with our Disciplinary Policy and Procedure. If relevant, the research funder will be informed and an action plan developed to attenuate any adverse effects (e.g. retracting publications, informing anyone affected by data misuse).

**Who should I speak to if I have questions about this policy?**

If a member of staff has any questions about this policy, they should discuss these with their line manager or with the Chief Scientist Office.

**Who is responsible for this policy?**

The Chief Scientist Office is responsible for this policy and will review it annually. The Chief Scientist will monitor the ongoing operation of the policy and if you have any comments or questions, please do not hesitate to let the Chief Scientist know.