

# Earlham Institute: Annual Statement on Research Integrity

## Section 1: Key contact information

Question	Response
<b>1A. Name of organisation</b>	The Earlham Institute (EI)
<b>1B. Type of organisation:</b>  higher education institution /industry/ independent research performing organisation/other (please state)	Independent research performing organisation.
<b>1C. Date statement approved by governing body (DD/MM/YY)</b>	01.04.2026 (for review period 01.01.25 – 31.12.25)
<b>1D. Web address of organisation's research integrity page (if applicable)</b>	<a href="https://www.earlham.ac.uk/ei-policies">https://www.earlham.ac.uk/ei-policies</a>
<b>1E. Named senior member of staff to oversee research integrity</b>	Name: Christine Fosker
	Email address: <a href="mailto:Christine.Fosker@earlham.ac.uk">Christine.Fosker@earlham.ac.uk</a>
<b>1F. Named member of staff who will act as a first point of contact for anyone wanting more information on matters of research integrity</b>	Name: Christine Fosker
	Email address: <a href="mailto:Christine.Fosker@earlham.ac.uk">Christine.Fosker@earlham.ac.uk</a>

## Section 2: Promoting high standards of research integrity and positive research culture.

### Description of actions and activities undertaken

#### 2A. Description of current systems and culture

*Please describe how the organisation maintains high standards of research integrity and promotes positive research culture. It should include information on the support provided to researchers to understand standards, values and behaviours, such as training, support and guidance for researchers at different career stages/ disciplines. You may find it helpful to consider the following broad headings:*

- *Policies and systems*
- *Communications and engagement*
- *Culture, development and leadership*
- *Monitoring and reporting*

#### ***Policies and Systems***

Earlham Institute (EI) maintains a comprehensive and evolving framework of policies, procedures, and governance systems that embed high standards of research integrity across all research activity.

EI's Research Integrity Policy sets out expectations for honesty, rigour, transparency, accountability, and respect in all aspects of the research life cycle, together with clear guidance on good research practice, management of data, authorship, publication, ethics, conflicts of interest, and the use of AI.

These policies operate alongside complementary frameworks, including EI's Scientific Data Management Policy, Human Data in Research Policy, Trusted Research Policy, Conflicts of Interest Policy, Whistleblowing Policy, and Disciplinary Policy and Procedure.

Clear systems are in place for the reporting, investigation, and oversight of research misconduct, underpinned by UKRI requirements and UKRIO-aligned procedures for preliminary assessment, formal investigation, and reporting to funders. This includes transparent mechanisms for ethical review, due diligence for international collaboration, and the appropriate handling of research involving human data, animals, or sensitive materials.

EI also maintains strong data governance systems, requiring secure storage, backup, retention and reproducibility of research data and code, supported by EI Scientific Computing and NBIP Research Computing teams.

#### ***Communication and Engagement:***

EI actively communicates expectations of good research practice to staff and students through multiple channels, including mandatory training, institute-wide meetings, group leader communications, policy sign-off processes, intranet updates, and targeted email and Teams communications. Institute-wide meetings take place six times a year and provide a regular forum where Research is openly raised and discussed, helping staff feel part of active institute-wide conversations on policy and Research Integrity, and supporting them to engage confidently with best practice rather than feeling fearful of making mistakes.

## 2A. Description of current systems and culture

The public-facing Research Integrity Statement (<https://www.earlham.ac.uk/ei-policies>) demonstrates EI's commitment to transparency and accountability and provides accessible routes for raising concerns.

EI further engages with sector-wide developments through participation in UKRIO webinars, consultations, and events, ensuring that internal policies remain aligned to national best practice.

### ***Culture, development and leadership:***

EI fosters a positive research culture through its core values of openness, excellence, collaboration, innovation, EDI, and support for career development.

Leadership commitment is visible through Executive oversight of integrity policies, participation in sector engagement, and support for training initiatives. Staff and students benefit from:

- Annual research integrity training, required for all scientists and repeated on a cyclical basis, with external experts used in 2025 for half-day training for staff and students to establish best practice.
- Leadership-specific integrity workshops to ensure those with supervisory responsibility model good practice.
- Participation in national train-the-trainer programmes to build internal capacity for future provision.
- Participation in UKRIO webinars and contribution to UKRIO strategic consultations demonstrating leadership engagement with national integrity discussion and developments.
- Strong integration of research integrity with EI's broader research culture work, including mentorship, recognition, EDI initiatives, open science, and transparent authorship and data sharing practices that emphasise both open and FAIR principles.

EI's commitment to open science includes mandatory preprints for all EI first/corresponding authored publications and rigorous expectations for data and code availability to support reproducibility.

### ***Monitoring and Reporting:***

EI maintains multiple layers of monitoring to ensure integrity is upheld in its research:

- Annual internal review of a sample of EI-authored publications by a Scientific Standards Committee, reviewing data, code, authorship, and reproducibility.
- Annual audits of data deposition and compliance with open access and FAIR data requirements.
- Mandatory reporting to UKRI of research misconduct investigations, following strict timelines and funder requirements.
- Annual reporting to the EI's Board of Trustee Directors (the Governing Body), with a public statement published on the EI website in line with the Concordat to Support Research Integrity.
- Annual reporting by the Board of Trustee Directors to the Charities Commission and Companies House, including submission of EI's audited Annual Report and Accounts, which detail governance arrangements, management of research-related risks, serious incidents (if any), and the Institute's compliance with statutory duties relevant to Research Integrity.

EI demonstrates strong operational governance through active involvement of the Chief Operating Officer and Research Faculty Office in reviewing misconduct procedures and reporting timelines, alongside rigorous internal oversight of ethics, compliance with statutory duties (such as the Human Tissue Act and Nagoya Protocol) Data Protection compliance, and AI governance.

## 2A. Description of current systems and culture

This work is carried out in close collaboration with EI's Data Protection Advisors and the Legal, Regulation, and Compliance Advisory Manager, ensuring that research integrity is upheld not only through policy but through sustained, practical leadership and monitoring, and Governing Body review and oversight.

These systems enable EI to embed and maintain high standards of research integrity, identify areas for improvement, and reinforce a culture where staff and students feel safe and supported to raise concerns.

## 2B. Changes and developments during the period under review

*Please provide an update on any changes made during the period, such as new initiatives, training, developments, also ongoing changes that are still underway. Drawing on Commitment 3 of the Concordat, please note any new or revised policies, practices and procedures to support researchers; training on research ethics and research integrity; training and mentoring opportunities to support the development of researchers' skills throughout their careers.*

During the period under review, EI undertook a series of significant developments to strengthen research integrity, enhance governance, and support researchers at all career stages in line with Concordat Commitment 3.

Several core EI policies were updated, including substantial revisions to the Research Integrity Policy, to align with the 2025 Concordat, UKRIO guidance, and emerging issues such as AI integrity and improved definitions of misconduct. EI also progressed updates to associated governance frameworks such as the Good Governance Policy, Risk Management Policy, and updated BBSRC/UKRI grant conditions, ensuring that researchers are supported by modern, compliant, and coherent systems.

EI also launched and advanced several training and development initiatives. Building on the half-day specialist research integrity training delivered in 2025, EI continued to implement actions arising from this external training, including revising misconduct definitions and ensuring reporting obligations are fully embedded with line managers actively reflecting on staff feedback from this training and escalating themes or concerns to EI's Executive, resulting in further targeted actions to strengthen Research Integrity practice across the Institute.

In parallel, EI undertook major work to modernise and strengthen AI governance, including re-drafting the AI policy, establishing a cross-institute working group, and embedding Data Protection and compliance expertise throughout the policy revision process.

EI also finalised and introduced the Software Governance Policy, including updated decision trees, clarified responsibilities, and a commitment to produce training materials and integrate software governance into inductions and other development programmes.

In addition, EI continued delivering high-quality training through the Advanced Training Programme, hosting hands-on workshops and events in areas including genomics, programming, data analysis, and engineering biology, which directly enhance researcher skills and capabilities. EI also participated in sector-wide initiatives such as the Connecting Research Culture Conference, with EI organising and hosting the inaugural conference in 2025 which included a session on AI best practice. These activities have further helped to embed best practice on integrity, mentoring, leadership development, and positive research culture.

## 2B. Changes and developments during the period under review

The establishment of a Legal, Regulation and Compliance Advisory Manager role to provide dedicated support alongside the Research Faculty Office to scientists across the Institute on matters of legal and ethical governance, including Data Protection and GDPR compliance, Human Tissue Act adherence, research ethics requirements, and contractual or regulatory due-diligence. The addition of this role has strengthened EI's capacity to guide researchers through complex governance processes, ensure appropriate safeguards are embedded in research design, and promote consistent, compliant practice across all research activities.

Collectively, these changes reflect both completed and ongoing improvements to EI's research environment, strengthening policy frameworks, deepening governance capability, and providing structured training aligned with our scientists' evolving needs.

## 2C. Reflections on progress and plans for future developments

*This should include a reflection on the previous year's activity including a review of progress and impact of initiatives if known relating to activities referenced in the previous year's statement. Note any issues that have hindered progress, e.g. resourcing or other issues.*

During the review period, as described above EI has made substantive progress in strengthening its research integrity environment, these updates reflect a maturing approach to embedding integrity across all institutional systems.

EI has also broadened its organisational capacity by strengthening oversight roles and developing new processes. The appointment of the Legal, Regulation and Compliance Advisory Manager has significantly improved EI's ability to support researchers in the legal and ethical dimensions of research, including Data Protection, GDPR, contractual due-diligence, and Human Tissue Act compliance. This addition has already enhanced the timeliness and robustness of ethics advice, DPIA processes, and governance decision-making.

Recent efforts to revise and modernise the Institute's AI governance framework demonstrate EI's responsiveness to emerging risks. A cross-functional working group involving operational leads, faculty representatives, Data Protection Advisors, and the Legal, Regulation and Compliance Advisory Manager has been convened to reshape the AI policy and ensure it reflects rapidly evolving practice. In parallel, EI significantly progressed development of a new Software Governance Policy, including updated decision trees, responsibility mapping, and planned training and induction resources. Together, these measures have provided EI's researchers with greater confidence to use AI platforms and related tools appropriately, knowing they are supported by clear guidance, robust oversight, and accessible expertise to help them integrate these technologies safely and effectively into their work.

EI has also invested in improving its research culture through participation in cross-institute initiatives such as the Connecting Research Culture Conference (which it planned and hosted in 2025), contributing to sector-wide discussions on integrity, mentoring, and leadership. Additionally, the Institute has continued to strengthen inclusion, wellbeing, and support structures through the IDEA Committee, which identified future needs around sustainability, visibility and resourcing of staff and student support networks. As a result, these activities have strengthened connections between staff responsible for Research Integrity across the BBSRC institutes, creating new opportunities to share best practice, support peers, and develop a more cohesive cross-institute integrity network.

## 2C. Reflections on progress and plans for future developments

### *Plans for Future Development*

Although EI has already implemented significant enhancements, several forward-looking developments are proposed to ensure continued alignment with sector best practice:

#### 1. Consolidation and Mapping of Integrity-Related Policies

EI will develop a clear, accessible “Integrity Framework Map” that brings together all policies, SOPs, training routes, and governance contacts in one place. This would help researchers navigate requirements easily and support future audits.

#### 2. Expansion of Internal Research Integrity Training Capacity

EI will develop an internal training cohort that draws on materials and methods gained through the Babraham Institute ‘Train-the-Trainer’ Research Integrity material, adapting and expanding these for EI’s specific research environment. This cohort will be delivered by training leads, with support from the Training and Development Manager, Data Governance & Management Leads, to ensure strong alignment with data-management expectations and FAIR data principles. Training content will be tailored to the most common needs of EI researchers and professional services staff, ensuring each institute has practical, relevant guidance that supports high-quality, responsible research practice.

#### 3. Further development of AI and Digital Research Governance

With foundational work already underway, EI will look to:

- Launch a fully refreshed AI policy and associated guidance.
- Introduce tailored training on AI ethics, generative AI risks, and digital-era integrity challenges.
- Embed checklists for AI use within DPIAs.

#### 4. Enhancing Research Integrity Policy.

EI will continue to refine and improve its Research Integrity Policy to ensure the tone consistently emphasises learning, reflection, and continual improvement. Future revisions will shift further toward a ‘how to do better’ and ‘how to learn’ approach, providing supportive, confidence-building guidance that empowers researchers to develop good practice without feeling at risk or discouraged. This includes strengthening constructive language, highlighting developmental pathways, and reinforcing that Research Integrity is a shared, supportive endeavour rather than a punitive one.

#### 5. Further Support for Research Culture and EDI Integration

EI will develop a new EDI Strategy in 2026, ensuring that accessibility considerations and potential unintended consequences are systematically assessed across all policies through an accessibility-impact lens. Embedding this approach will help ensure that every policy is reviewed with an understanding of how it affects different groups across the Institute. As Research Integrity is a core part of research culture, this work will also support colleagues to recognise and appreciate cultural differences in expectations around RI, empowering everyone to act confidently on RI matters and reinforcing it as a shared value across the organisation.

## 2D. Case study on good practice (optional)

*Please describe an anonymised brief, exemplar case study that can be shared as good practice with other organisations. A wide range of case studies are valuable, including small, local implementations. Case studies may also include the impact of implementations or lessons learned.*

### Background

A research project involving human-derived organoids was initiated in collaboration with an external clinical partner. Ethical approval existed, but documentation was complex: samples were sourced via a multi-step clinical pipeline, and it was initially unclear whether all stages, patient identification, consent, sample processing, and data transfer, were correctly captured for EI's involvement. The project raised important questions around:

- Whether EI was formally covered under the existing ethics approval
- Whether transfer of organoid materials and related data aligned with GDPR and the Human Tissue Act
- Whether EI could process any associated data internally
- Whether a Data Transfer Agreement (DTA) was required before work could proceed

This created significant uncertainty for the research group about whether EI could legally and ethically begin work. The issue was escalated appropriately.

### Intervention

EI's Legal, Regulation and Compliance Advisory Manager undertook a detailed review of the ethics approvals and protocol documents provided by the external collaborator. The researcher explained the integrated clinical process in detail, from patient identification by the research nurse through to organoid generation and biobanking, which helped EI reconstruct the full data/material flow.

Following this review, Compliance identified that:

- The IRAS Favourable Opinion Letter and accompanying protocol did in fact cover the transfer of samples/data to EI.
- EI's involvement needed clearer documentation, especially regarding data handling and DTA requirements.

An outstanding question remained about a separate set of EU samples, and whether those ethics or licence conditions permitted any processing at EI.

By liaising closely with the collaborator and EI's internal stakeholders, Compliance clarified which work could proceed immediately, and which required additional approval and documentation (e.g., formalising a DTA or obtaining ethics clarification before data upload).

### Outcome and Impact

This coordinated approach resulted in:

- Clear, evidence-based assurance that EI could ethically and legally receive and work with the organoid samples from the primary cohort.
- Identification of gaps (e.g., EU sample permissions), preventing EI from unknowingly engaging in non-compliant activity.
- Avoidance of delays during later phases of the project by ensuring documentation was correct at the outset.

## 2D. Case study on good practice (optional)

- Increased researcher confidence and reduced governance burden, as they received tailored explanation of ethics pathways, consent boundaries, and human-data rules.
- A practical example of the value of early compliance engagement for complex human-data projects.

### Why This Is Good Practice

This real EI case illustrates the importance of:

- Early multidisciplinary governance review
- Close researcher/compliance collaboration
- Clear mapping of sample/data pipelines
- Evidence-based decision-making on ethical and legal compliance
- Proactive identification of cross-border risks (e.g., EU samples)

It demonstrates how EI's growing internal capability, including the Legal, Regulation and Compliance function, is now actively preventing compliance failures, reducing operational risk, and improving researcher experience.

## Section 3: Addressing research misconduct

### 3A. Statement on processes that the organisation has in place for dealing with allegations of misconduct

Please provide:

- *a brief summary of relevant organisation policies/ processes (e.g. research misconduct procedure, whistleblowing policy, bullying/harassment policy; appointment of a third party to act as confidential liaison for persons wishing to raise concerns) and brief information on the periodic review of research misconduct processes (e.g. date of last review; any major changes during the period under review; date when processes will next be reviewed).*
- *information on how the organisation creates and embeds a research environment in which all staff, researchers and students feel comfortable reporting instances of misconduct (e.g. code of practice for research, whistleblowing, research misconduct procedure, informal liaison process, website signposting for reporting systems, training, mentoring, reflection and evaluation of policies, practices and procedures).*
- *anonymised key lessons learned from any investigations into allegations of misconduct which identified opportunities for improvements in the organisation's investigation procedure and/or related policies / processes/ culture or which showed that they were working well.*

#### Summary of relevant policies/processes:

EI has a clear, robust, and regularly reviewed framework for managing allegations of research misconduct, as set out in the Research Integrity Policy. This policy defines research misconduct, outlines detailed procedures for screening, preliminary assessment, formal investigation, and reporting, and sets out the responsibilities of all parties involved.

Allegations may be raised under the Research Integrity Policy or, where appropriate, under related institutional procedures, such as the Whistleblowing Policy, Disciplinary Policy and Procedure, or UKRI's Good Research Practice and misconduct governance. EI explicitly signposts these routes.

### 3A. Statement on processes that the organisation has in place for dealing with allegations of misconduct

The Research Integrity Policy is periodically reviewed, with the most recent update occurring in February 2026, reflecting new UKRIO guidance, the updated 2025 Concordat, and improvements such as clarifying definitions of misconduct and reporting obligations. The next scheduled review is part of EI's standard three-year cycle unless triggered earlier by major regulatory or sector changes.

Our Whistleblowing Policy was last reviewed and updated in September 2025, our Disciplinary Policy and Procedure and Trusted Research Policy are currently undergoing review and update, our Scientific Data Management Policy was reviewed and updated in 2024, our Conflicts of Interest Policy was reviewed and updated in 2025, and our Human Data in Research Policy was reviewed by external Data Protection Auditors in 2025 and confirmed to be fully compliant and up to date. All policies are reviewed and updated on a regular 3-year cycle or sooner in response to regulatory and sector changes.

During the review period, the policy was strengthened to incorporate emerging issues such as the requirement that failure to act on a report of misconduct is itself a form of misconduct. This revision followed feedback from external research integrity training.

EI also directs staff to additional relevant frameworks including the UKRI Whistleblowing Policy, the Public Interest Disclosure Act requirements, and UKRIO investigation procedures.

#### Information on how EI embeds a safe environment for reporting misconduct:

EI takes several active steps to embed a culture in which all staff, researchers, and students feel comfortable raising concerns:

#### 1. Clear Communication and Signposting

EI maintains a publicly accessible Research Integrity Statement on its website, outlining expectations for integrity, defining key principles, and providing direct contact details for the Chief Operating Officer, Head of the Research Faculty Office and Data Protection Advisors for individuals wishing to raise concerns.

This statement complements internal signposting through EI-all staff meetings, the intranet, and updated policy communications.

#### 2. Multiple Safe Reporting Channels

Staff, students, and visitors may raise concerns through:

- Line managers and Group Leaders
- The Chief Operating Officer or the Head of the Research Faculty Office
- The Legal, Regulation, and Compliance Advisory Manager
- The Human Resources team
- Whistleblowing routes allowing anonymous disclosures

These multiple entry points help reduce barriers to reporting and accommodate different levels of confidence and sensitivity.

### **3A. Statement on processes that the organisation has in place for dealing with allegations of misconduct**

#### **3. Protections for Individuals Raising Concerns**

In addition to the protection provided under the Whistleblowing policy, EI's other policies emphasise that anyone reporting concerns in good faith will be protected from retaliation, victimisation, or detriment. This protection extends to those participating in investigations.

#### **4. Training and Capacity Building**

EI has invested in comprehensive training for staff and students, including:

- Full-day external research integrity training in 2025 for all scientists and professional support staff, which included guidance on raising concerns and recognising misconduct.
- Ongoing internal updates and workshops, including for senior staff and leaders, reinforcing obligations to report concerns and demonstrating EI's expectations around transparency and accountability.

#### **5. Supportive Governance and Advisory Roles**

EI strengthened its integrity environment through the formal appointment of a Legal, Regulation and Compliance Advisory Manager, who provides accessible advice on ethical and legal issues, assists researchers with concerns, and guides staff through DPIAs, ethics queries, and appropriate reporting routes. This role supports early identification and escalation of issues, helping ensure that researchers feel supported throughout the process.

#### **6. Continuous Reflection and Improvement**

EI regularly evaluates its processes, drawing on:

- Feedback from external research integrity training
- Internal policy reviews
- Case-based learning
- Updates from UKRIO and UKRI governance framework

These evaluations inform iterative improvements to policies, training, and communication, further strengthening an open culture of responsible research practice.

#### **Key lessons learnt from relevant investigations:**

There were no relevant investigations during the relevant period.

**3B. Information on investigations of research misconduct that have been undertaken**

Please complete the table on the number of **formal investigations completed during the period under review** (including investigations which completed during this period but started in a previous academic year). Information from ongoing investigations should not be submitted.

An organisation's procedure may include an initial, preliminary, or screening stage to determine whether a formal investigation needs to be completed. These allegations should be included in the first column but only those that proceeded past this stage, to formal investigations, should be included in the second column.

Type of allegation	Number of allegations			
	1 January 2025 – 31 December 2025			
	Number of allegations reported to the organisation	Number of formal investigations	Number upheld in part after formal investigation	Number upheld in full after formal investigation
Fabrication	0	0	0	0
Falsification	0	0	0	0
Plagiarism	0	0	0	0
Failure to meet legal, ethical and professional obligations	0	0	0	0
Misrepresentation (eg data; involvement; interests; qualification; and/or publication history)	0	0	0	0
Improper dealing with allegations of misconduct	0	0	0	0
Multiple areas of concern (when received in a single allegation)	0	0	0	0
<i>Other*</i>	0	0	0	0
<b>Total:</b>	0	0	0	0
<p><b>*If you listed any allegations under the 'Other' category, please give a brief, high-level summary of their type here. Do not give any identifying or confidential information when responding.</b></p>				
n/a				