



Principles of Research Integrity

1 Introduction and scope

In setting out the *Principles of Research Integrity*, it is vital to define five key terms:

- 1 research integrity
- 2 research
- 3 heritage
- 4 historic environment
- 5 human culture.

Whilst the definitions provided of these terms are not intended to be comprehensive (this is beyond the scope of this document), they nevertheless establish the subject-specific and technical parameters on which the *Principles* are focused.

In broad terms, **research integrity**¹ can be conceptualised as a set of principles and practices that foster strong and robust ethical, professional, and methodological standards in the conduct of research. Underpinning research integrity is a robust culture of institutional integrity which is based on good research governance, best practice, as well as mentorship and support for researchers.

In broad terms, **research** is defined as a process of investigation with the purpose of refining and identifying knowledge, insight, and innovation.

The Arts and Humanities Research Council (AHRC) specifies that **heritage** represents "the accumulated diverse collections, material traces, knowledge, practices, skills, places and institutions on which we draw to bring the past into the present and to stimulate reflection on the future. It forms the evolving collective cultural memories of societies, acting as a source of artistic, literary, and scientific inspiration, creativity and enterprise for current and future generations. It contributes to diverse and changing identities and can provide the basis for the exchange (and contesting) of ideas, learning and knowledge between and across cultures and generations".

¹ In defining research integrity, the Principles of Research Integrity additionally refer to the Singapore Statement on Research Integrity (2010) as well as the research integrity principles outlined in the UK Research Integrity Office's Code of Practice (2009).

Related to **heritage** is the **historic environment**. In broad terms, the **historic environment** is the physical evidence of past human activity. It connects people with place, and with traditions, stories and memories linked to those places. More specifically it encapsulates "All aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora" (*see* National Planning Policy Framework, Ministry of Housing, Communities & Local Government, 2021).

Finally, **human culture** can be conceptualised as the shared systems of knowledge, experience, beliefs, practices, and norms of groups of people or societies that are passed down through generations.

It therefore follows that research related to heritage, the historic environment and culture aims to address themes related to:

- Values and cultural heritage
- Community co-production and wider public engagement
- Public understanding of the past
- Inclusion and diverse heritages
- Sustainable management of heritage
- Role of heritage in shaping the future of society
- Intangible, emerging, hidden and contested heritages
- Changing heritage economies
- Contested pasts and conflict
- Global heritages, international development, and global challenges

The Historic Buildings and Monuments Commission for England (HBMCE), known as Historic England (henceforth referred to as 'HE') and incorporating the English Heritage Trust (henceforth referred to as 'EHT'), is a Public Sector Research Establishment (PSRE) and recognised by UK Research and Innovation (UKRI) as an Independent Research Organisation (IRO). As such HE and EHT are expected to conform to the highest standards in the research they conduct, whether that be done internally by their own staff, through commissioned projects or in partnership with external bodies.

Research is a fundamental underpinning activity for both organisations, supporting their corporate plans² and strategies in all areas. It is within this context that their research agendas

² HE's Corporate Plan HistoricEngland.org.uk/about/what-we-do/corporate-plan/ and Public Value Framework HistoricEngland.org.uk/about/what-we-do/corporate-plan/public-value-framework/. EHT's Corporate Plan English-Heritage.org.uk/about-us/.

are embedded with a remit of not only conducting research with the purpose of making scholarly contributions, but importantly to effect positive change on people, communities, and the historic environment. Therefore, research within HE and EHT is in most cases **applied** and includes a wide range of research activity relating to heritage and the historic environment.

Key principles, procedures and frameworks

- Principles of Research Integrity
- Statement of Good Research Conduct
- Research Ethics Policy and Procedures
- Research Governance Framework

The *Principles of Research Integrity* outlines the foundations for the standards of conducting good research, as well as HE and EHT's responsibilities for upholding these standards. The *Principles* additionally refer to existing HE and EHT policies and procedures, and national and international standards and regulations. Thus, the main purpose of this document is to ensure that those involved in research are aware of and are compliant with current sector-based regulations and standards, as well as championing best practice and innovation³.

Oversight of research integrity

Research integrity at both organisations is overseen by the National Head of Research at Historic England and the Head Collections Curator at English Heritage Trust, who are formally the first point of contact for anyone wanting more information on matters of research integrity. In these roles, John Cattell and Matt Thompson currently oversee research integrity at HE and EHT, respectively.

Who should read the Principles of Research Integrity?

As noted above, research within HE and EHT goes beyond the traditional parameters of activities focused on scholarly contributions, but rather in most cases is *applied* in nature. Therefore, research not only consists of intellectual activities and work which aim to discover, create, and advance knowledge connected with the historic environment, heritage, and collections; but has evolved to encapsulate day to day activities that bring people of all ages and backgrounds the opportunity to discover, explore, understand and be inspired by the historic environment.

Against this backdrop, the *Principles of Research Integrity* is for all staff in HE and EHT who take part in research activities as part of their job function as well as staff whose work is focused on delivering core corporate strategies, henceforth referred to as *Researchers*. Researchers are therefore all **staff**, **contracted staff**, **external collaborators**, **individuals** or **organisations** who receive grant funding from HE and EHT (i.e. **grantees**), **volunteers**, **doctoral students** and **placement students** undertaking research related activities within or on behalf of the two organisations.

³ Please refer to the Statement on Good Research Conduct for more detailed guidelines on good conduct in research.

2 Principles and frameworks

2.1 In setting out the principles and frameworks HE and EHT have adopted the five principles of research integrity as specified in the Concordat to Support Research Integrity (2019): (1) honesty (2) rigour (3) transparency and open communication (4) care and respect and (5) accountability. As such, it is expected that all five principles (as described below) are applied consistently throughout the research process (i.e. from inception to dissemination for both internally and externally funded work) by all Researchers regardless of the area of discipline related to heritage, human culture, and the historic environments:

Honesty in all aspects of research, including in the presentation of research aims, objectives and findings; in reporting on research methodologies, procedures, and protocols; in data collection and information gathering; in using and acknowledging the work of other Researchers, members of communities and groups, collaborators, and stakeholders; and in conveying valid interpretations and making justifiable claims based on research findings.

Rigour in line with disciplinary standards and norms, and in performing research and using appropriate methodologies; in adhering to an agreed protocol and/or procedure where appropriate; in drawing objective interpretations and conclusions from the research; and in communication and dissemination of findings.

Transparency and Open Communication in declaring potential conflicts of interests; in the reporting of research data collection methods; in the analysis and interpretation of data; in making research findings widely available and accessible; and in presenting the work to other researchers and to the public [This is contingent on employing an Open Science framework which diffuses knowledge through the use of digital technologies and collaborative tool which foster collaboration, sharing and openness in the research process].

Care and Respect for all users, stakeholders, and beneficiaries of research, including, but not limited to, humans and animals (living and ancient remains); the environment and cultural objects; participants in research; owners of artefacts being studied; indigenous peoples and communities; and for other research colleagues and collaborators.

Accountability of HE and EHT to collectively create a research environment and culture in which Researchers are supported, empowered, and enabled to own the research process. HE and EHT are responsible for addressing any conduct by Researchers which falls short of subject specific standards and norms. Conversely, HE and EHT should ensure that Researchers are supported and protected when they encounter unfair (or unreasonable) criticism and/or abuse in the public sphere – it is therefore critical that HE and EHT collectively develop and sustain a research environment in which Researchers feel safe, protected, and empowered to conduct their research even in the face of unfair (or unreasonable) public scrutiny and/or abuse.

- 2.2 Researchers must carry out research and research related activities in accordance with the standards of research practice set out in guidelines published by funding bodies, scientific and learned societies, and other relevant professional bodies (for example, the Chartered Institute for Archaeologists; the Institute of Historic Building Conservation; the Institute of Conservation; the Museum Association Code of Ethics; the International Council of Museums - Committee for Conservation: the International Institute for Conservation of Historic and Artistic Works). Research must be conducted in accordance with all applicable statutory and regulatory requirements, including, but not limited to, the Code of Conduct for government grant recipients and the Cabinet Office's Guidance for General Grants⁴; Guidelines to the Standards for Recording Human Remains; the Human Tissue Act (2004); the Animals (Scientific Procedures) Act (1986); the Dealing in Cultural Objects (Offences) Act (2003); the Equality Act (2010); the General Data Protection Regulation (GDPR)⁵ and associated legislation [i.e. Data Protection Act (2018)]; the Fraud Act (2006); and the Health and Safety at Work Act (1974; 2014). In addition, research activities which take place outside of the United Kingdom (UK) must not only comply with UK standards and regulations, but additionally be compliant with the statutory and regulatory requirements of the country where the research is being undertaken.
- 2.3 Research⁶ must undergo ethical review and receive ethical approval as set out in HE and EHT's *Research Ethics Policy and Procedures* and its *Research Governance Framework*.
- 2.4 Within the frameworks, policies and standards outlined in 2.2 and 2.3, Researchers must observe HE and EHT's internal policies and standards, as well as national and international standards. For example, researchers should observe the requirements and standards of practice set out in guidelines published by scientific societies, funding agencies and other relevant professional bodies, as well as the requirements that are formally stated as conditions for statutory consent.
- 2.5 Research should empower and include underrepresented voices, untold narratives and knowledge sources that have historically been excluded from research related to heritage, and the historic environment. Researchers must also be empowered to actively engage in reflection and discourse about the past and present historical context, as well as their own research positionality and internalised norms.

5 UK General Data Protection Regulation (GDPR) sits alongside the Data Protection Act 2018 to form primary data protection law in the UK. UK GDPR retains very similar principles, rights and obligations to those found in EU GDPR.

6 The Research Ethics Policy and Procedures and Research Governance Framework provide Researchers with a definitive checklist of what constitutes research and research related activities that will require ethical review and approval.

⁴ The Code of Conduct for government grant recipients and the Cabinet Office's Guidance for General Grants is specific to HE only. The Code of Conduct states that "It is also important to ensure that public money is not granted to recipients that fall short of the ethical standards that departments require of them, when carrying out the activities being funded. Departments are encouraged to make the necessary checks of potential recipients to ensure they have in place processes to safeguard against any number of ethical issues that may vary depending on the nature of the grant and the activities to be funded. These may include: misuse of funds, conflicts of interest, or even ensuring that vulnerable adults and children are protected".

- 2.6 HE and EHT are committed to addressing the impact of climate change on the historic environment and ecosystems. Adapting to and mitigating the impact of climate change from a research perspective demands a comprehensive view which strengthens the connections between conservation science and policy with the goal of informing evidence-based decision making to sustain the historic environment. As such Researchers should account for ecological dimensions in their research methodologies and analyses where appropriate.
- 2.7 **Heritage is for everyone** is at the heart of HE and EHT's strategies for Equality, Diversity, and Inclusion⁷. As such HE and EHT's work is committed to ensuring that a diverse range of people, including marginalised people and communities (i.e. people of colour; ethnic minorities; women and girls; people with physical and mental disabilities; and Lesbian, Gay, Bisexual, Transgender, Queer, Intersex and Asexual/LGBTQI+ people) as well as people from disadvantaged backgrounds can connect with, enjoy, and benefit from the historic environment. Researchers should therefore take account of Equality, Diversity and Inclusion considerations in relation to how they conduct research, manage and supervise staff and volunteers, and in co-productive collaborations with key stakeholders.
- 2.8 Including key stakeholders (for example, communities, young people, children, vulnerable populations, and people from marginalised backgrounds) in research and innovation practices is an effective strategy in ensuring that research delivers impact and positive change for communities and the wider society. It also supports Researchers' professional development as they can learn from the stakeholders who are impacted by their research. In turn the affected individuals and/or communities have influence on the research process thereby ensuring that research is conducted in a manner which is transparent and based on mutual respect. As such, HE and EHT are committed to connecting the wider public and communities with research through co-production. In developing and employing a co-production strategy Researchers should ensure that persons and/or communities with a vested interest in a specific piece of research are involved in key aspects of the research process (including, but not limited to, developing research questions and aims, methodological design, and communication and dissemination of findings).
- 2.9 Related to 2.8 is the wellbeing of the people and/or communities (particularly those from marginalised groups and vulnerable populations, young people, and children) that HE and EHT's research involves and impacts. HE and EHT's research agendas are embedded within a remit of effecting positive change, and at the heart of this is gaining an understanding of the factors that impact on the wellbeing of individuals and communities. As such, Researchers should ensure that when developing their research that they adopt a person/communities-centred approach which takes into account factors such as health and socio-economics inequalities that impact on people's lives in order to make the best use of heritage for those who are the most vulnerable in society. Researchers must also be empowered to actively engage in reflection and discourse about the impact that their research has on people's lives, as well as shaping the present and future of communities.

⁷ HE's A Strategy for Inclusion, Diversity and Equality, 2020-2023 and EHT's Equality, Diversity and Inclusion Strategy.

3 Good research practices⁸

- 3.1 Research environment and culture.
 - 3.1.1 Researchers have a duty to the heritage and historic environment research community, to their funders and the wider public to behave in a manner which demonstrates the highest standards and rigour in research practice. Whilst the primary responsibility falls with the individual Researcher, HE and EHT have the responsibility to provide Researchers with leadership on this issue by fostering a research environment and research integrity culture through the provision of a *Research Governance Framework* and best practice, as well as learning, training, development, and mentorship.
 - 3.1.2 Given the potential that research activities may extend beyond borders, divergences and commonalities between local, national, and international research integrity standards should be addressed and common standards developed for collaborative work.
- 3.2 Training, supervision and mentorship.
 - 3.2.1 HE and EHT have the responsibility to provide Researchers with support, training and development opportunities across all career stages that empowers them to not only carry out research to the highest standards, but also to identify, manage and resolve research ethical dilemmas that they may encounter, and to be made aware of internal research ethics policy and procedures.
 - 3.2.2 HE and EHT have the responsibility of supporting early career researchers (ECRs)⁹ in realising their research and career goals by fostering a research environment and culture which sustains their wellbeing through community, networking, and tailored support (for example, providing guidance and support in relation to publication practices and funding opportunities). This can be achieved through targeted activities such as a Mentorship Programme and an ECR forum.

8 Please refer to the Statement on Good Research Conduct for more detailed guidelines on good conduct in research.

- 9 The Arts and Humanities Research Council (AHRC) defines an ECR as someone who is either:
 - within eight years of their PhD award (this is from the time of the PhD 'viva' oral test), or equivalent professional training and/or experience
 - within six years of their first academic appointment (the first full or part time paid employment contract that lists research or teaching as the primary function)

These periods exclude any career break, for example due to:

- family care
- health reasons
- reasons related to COVID-19 such as home schooling or increased teaching load.

- 3.3 Research procedures.
 - 3.3.1 Researchers should ensure that they keep up to date with methodological and statistical analyses approaches and practices, as well as technologies that may impact on the way they conduct research.
 - 3.3.2 In updating their knowledge base in relation to innovations in research technologies (for example, the use of satellite imagery, artificial intelligence, and machine learning) Researchers must be aware that technology is not an ethically neutral medium. Thus, whilst Researchers must engage in continued professional development in updating their skills set in relation to innovations in technologies and methodological tools, Researchers should ensure that they actively reflect on and consider the potential ethical implications of these innovations on the way they conduct research.
 - 3.3.3 Researchers should use research funds in a manner which does not compromise standards, regulations, and research ethics.
 - 3.3.4 Researchers should report and disseminate research findings in a manner which is open, honest, transparent, accurate, accessible, and timely (whilst accounting for data confidentiality and anonymity where appropriate) and in accordance with discipline specific standards, to enable verification and reproducibility (*see* The UK Reproducibility Network).
- 3.4 Preventing harm in research (safeguarding)¹⁰
 - 3.4.1 HE and EHT have a duty of care to ensure that the welfare of Researchers who are involved in research and research related activities that are carried out on their behalf is prioritised and that mitigations are in place to address any potential risks associated with these activities.
 - 3.4.2 HE and EHT have a duty of care to key stakeholders, including individuals, communities involved in and/or impacted by their research.
 - 3.4.3 In line with the *Research Ethics Policy and Procedures*, where appropriate, Researchers must put in place plans that consider and mitigate the risks of potential harm and determine how key stakeholder concerns will be appropriately dealt with.
 - 3.4.4 Researchers should actively engage in discussions with their external collaborators, and collaboratively agree upon a unified approach to defining and managing harm within the context of the research project.

¹⁰ Within this context the Principles have adapted the UK Collaborative on Development Research definition of Safeguarding in research as "preventing and addressing any sexual exploitation, abuse and harassment of research participants, communities and research staff, plus any broader forms of violence, exploitation and abuse relevant to research such as bullying, psychological abuse and/or physical violence".

- 3.4.5 HE and EHT should ensure that appropriate safeguarding policy, procedure, guidance, and training are in place.
- 3.4.6 HE and EHT should report, where appropriate, incidents of harm to relevant Researchers, research collaborators, including grantees working on their behalf, and to external funders (such as the AHRC).
- 3.5 Collaborative research.

In forming research collaborations, all research partners should agree at the outset on the objectives of the research, expectations, standards of research integrity, on the laws, standards and regulations that will apply, on protection of the intellectual property of collaborators (*see* 3.6 and 3.7), on procedures for handling conflicts (*see* 3.10) and possible cases of misconduct (*see* 5), and on the process for communicating the research findings in a transparent and open manner.

- 3.6 Intellectual property rights.
 - 3.6.1 Research often results in the creation of Intellectual Property (IP). UKRI states that IP "covers a wide range of rights that can be used to define, protect and exploit products of the human mind, human creativity and invention. IP includes patents, copyright (including software and databases), designs, trademarks and know how".
 - 3.6.2 UKRI further clarify that "Copyright is an intellectual property right assigned automatically to the creator. It prevents unauthorised copying and publishing of an original work. Copyright applies to research data and plays a role when creating, sharing and reusing data".
 - 3.6.2.1 The Copyright, Designs and Patents Act 1988 specifies that copyright applies to original literary, dramatic, musical or artistic works; sound recordings, films, broadcasts; and typographical arrangement of publications¹¹.
 - 3.6.2.2 For copyright to apply, any work resulting from research related activities must be original and in a tangible form (for example written or recorded materials).
 - 3.6.2.3 If work resulting from research related activities involves more than one Researcher, then copyright is owned by all Researchers involved in the creation of the work.

¹¹ Research outputs (for example, publications and datasets) are considered literary work and are therefore protected by copyright.

- 3.6.2.4 For work resulting from collaborative work involving Researchers as well as key stakeholders and external organisations, copyright is held by all Researchers, stakeholders and external organisations involved in the creation of the work.
- 3.6.2.5 Copyright can only be transferred in writing by the owner.
- 3.6.3 Researchers should ensure that any IP developed through research related activities that are publicly funded should be disseminated in an open and accessible manner so that it may benefit the wider public, communities and society, unless there is a restriction placed on any such dissemination activities.
- 3.7 Moral, publication and database rights, and freedom of information.

Beyond the issues outlined in 3.6, Researchers should be aware of moral, publication and database rights related to their work resulting from research related activities. Additionally, Researchers should be aware that statutory legislations, specifically, the Freedom of Information Act (2000), affords members of the public to request access to recorded information and data which are held by HE and EHT as PSREs.

- 3.7.1 Researchers hold moral rights for their work generated from research related activities which cannot be transferred, and as such it affords Researchers the right to be identified (or acknowledged) as the creator of a work. Moral rights cannot be sold to another party; however, they can be waived by the Researcher and bequeathed upon the Researcher's passing.
- 3.7.2 Publication rights is a type of copyright which is granted to a Researcher who first publishes a piece of work which was previously unpublished, and as such it rewards the Researcher with the creative efforts involved in editing an unpublished piece of work.
- 3.7.3 Database rights is a *sui generis* property right, which is comparable to copyright (but is distinct from copyright in that it is not focused on the originality or "creative" aspect of the content), that exists to recognise the substantial intellectual investment that is made in compiling a database (i.e. a collection of independent work that is arranged in a systematic way). Database rights is an automatic right and protects databases (and Researchers who create databases) against the unauthorised extraction and reuse of their contents.
- 3.7.4 The Freedom of Information Act (2000) affords the public the right to request access to recorded information held by HE and EHT. Whilst research data can be requested under the Act, the copyright remains with the Researchers who created the work.

3.8 Research involving live human participants.

Researchers should ensure that research involving human participants or personal data complies with all legal and ethical requirements. The terms of engagement for research involving participants and personal data are addressed in detail in the *Research Ethics Policy and Procedures*.

3.9 Health and safety.

Researchers should take into account HE and EHT's Health and Safety Procedures and legal requirements when designing and carrying out research. Senior Researchers have direct responsibility for their research teams in ensuring that their team members are knowledgeable of and have completed relevant training regarding health and safety. Where appropriate, risk assessments should be carried out in line with HE and EHT procedures, which includes individual Researchers and individuals participating in or impacted by the research project.

3.10 Conflicts of interest.

- 3.10.1 A conflict of interest (i.e. financial, personal, academic, institutional, political), whether real or perceived, can significantly impact, and damage the credibility of a Researcher, as well as that of HE and EHT and the wider culture and heritage research community. As such, Researchers should identify and declare any potential or actual conflicts of interest at all stages in the research process (i.e. from inception to dissemination).
- 3.10.2 Measures to address conflicts of interest should be considered explicitly as part of the formal ethics approval process.

3.11 Research ethics.

- 3.11.1 There are many ethical considerations when undertaking research. Researchers should therefore refer to the *Research Ethics Policy and Procedures* which details the definition of research, research ethics and procedures for ethical approval when planning, designing, and conducting research.
- 3.12 Data practices and management.
 - 3.12.1 Researchers should ensure open access to data where appropriate. Where possible data should conform to the FAIR (Findability, Accessibility, Interoperability, and Reuse) Principles.
 - 3.12.2 Researchers are responsible for ensuring that professional standards and contractual obligations are satisfied in relation to their research data.
 - 3.12.3 Arrangements for data sharing between institutions (or data providers) should be agreed upon prior to the commencement of the research project. Researchers should consider relevant technical data standards to help ensure the quality of data and support data sharing. These should be highlighted in a Data Management Plan.

- 3.12.4 Researchers should keep an accurate and comprehensive record of research procedures.
- 3.12.5 Records, samples and materials should be clearly and accurately labelled, and safely stored in line with regulatory requirements and standards.
- 3.12.6 A formal Data Management Plan should be embedded within the ethical approval process.
- 3.12.7 Guidance on archiving, maintenance and disposal of research data must be observed in line with regulatory requirements and standards.
- 3.12.8 Sensitive, classified and/or personal data should be securely stored, with only the relevant Researchers having authorised access in compliance with the Data Protection Act (2018) (and UK GDPR) and the Copyright, Designs and Patents Act 1988.

4 Publication and dissemination

- 4.1 HE and EHT will encourage Researchers to pursue routes of dissemination which are accessible and open to the wider research community and the public where practicable¹². Openness implies more than disclosure of data. All those engaged with research have a responsibility to ensure the data they gather and generate is properly managed, and made accessible, intelligible, assessable, and usable by others unless there are legitimate reasons to the contrary. Access to research data therefore carries implications for cost and there will need to be trade-offs that reflect value for money and use.
- 4.2 Researchers should agree on the sequence of authorship.
- 4.3 Researchers should acknowledge the contributing work and intellectual contributions of others, including collaborators, participants, volunteers, communities, assistants, and funders, who have influenced the reported research. [Please refer to 3.6 and 3.7 with regards to IP and other rights]
- 4.4 Researchers should consider null findings as valid and as such report these in a transparent and open manner.

¹² Not all research data can be open and the Concordat to Support Research Integrity (2019) recognises that access may need to be managed in order to maintain confidentiality, guard against unreasonable cost, protect individuals' privacy, respect consent terms, as well as managing security or other risks.

5 Research misconduct¹³

- 5.1 HE and EHT consider any breaches to research conduct as serious and are fully committed to the application of transparent measures in responding to and managing any reports of research misconduct.
- 5.2 Any internal procedures to deal with research misconduct must be applied alongside statutory or regulatory requirements where appropriate.
- 5.3 Researchers have a personal responsibility to promote and support a research environment and culture which promotes research integrity and honesty in all aspects of the research process.
- 5.4 Research misconduct procedures are conducted confidentially.
- 5.5 HE and EHT will protect whistleblowers during any investigations of research misconduct.
- 5.6 HE and EHT will have a public facing statement on the general procedures for dealing with violations of good research practice.
- 5.7 Investigations of research misconduct are conducted with fairness and due process.
- 5.8 Researchers accused of research misconduct are given full details of the allegation(s) and allowed a fair process for responding to allegations and presenting evidence.
- 5.9 Anyone who has concerns about research conduct should in the first instance raise the issue with their line manager or head of department, who then in turn will initiate a process to look into the allegations. If an external partner has any concerns, then they should raise this as an informal allegation with the Researcher/Principal Investigator for the project and then, if not satisfactorily resolved, through the formal process described in 5.10.
- 5.10 If after these proceedings (as specified in 5.9) the person who raised the initial allegation is not satisfied with the outcome then they may make a formal allegation submitted to the HE or EHT Research Ethics Committee via the research@ HistoricEngland.org.uk or research@english-heritage.org.uk email address, respectively. The allegation is then followed up by the Committee formally in liaison with HR.

13 Please refer to the *Statement on Good Research Conduct* for more detailed guidelines on research misconduct. The Concordat to Support Research Integrity (2019) states that "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" (p.12).

- 5.11 HE and EHT view fraud¹⁴ as an extremely serious matter and are committed to investigating allegations of potential fraud. As such HE and EHT should be able to withstand both internal and public scrutiny.
 - 5.11.1 Researchers must comply with statutory regulations including the Bribery Act (2010) and the Cabinet Office Counter Fraud Framework.
 - 5.11.2 Researchers should familiarise themselves with UKRI Code of Conduct and Gifts and Hospitality Policy.
 - 5.11.3 Where fraud is alleged, HE and EHT are committed to investigating the allegations, to recover any assets lost and to taking action against Researchers who perpetrate fraud.

¹⁴ Fraud can be broadly conceptualised as acts involving deception, bribery, forgery, extortion, corruption, theft conspiracy, embezzlement, misappropriation of funds, false representation, concealment of material facts and collusion.