



Scottish Funding Council  
Comhairle Maoineachaidh na h-Alba

**SFC GUIDANCE**

**REFERENCE: SFC/GD/05/2026**

**ISSUE DATE: 26/05/2026**

# Research Integrity Policy



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**Issue Date:** 26 May 2026

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**Summary:** This policy applies to Scottish higher education institutions which receive research and innovation funding from SFC and to research activities which are directly funded by SFC. It sets out general responsibilities that we expect institutions and individuals to meet in order to support integrity in their research activities. The policy also sets out SFC's research misconduct reporting requirements and actions that we may take if proven research misconduct is reported to us. The policy will take effect from 1 September 2026.

**FAO:** Vice Principals for Research and research integrity leads of Scotland's universities.

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## Introduction

1. SFC is a signatory to the [Concordat to Support Research Integrity](#) ('the Concordat'). This is a national framework and reference document for good practice and governance of research integrity in the UK, with the first edition published in 2012.
2. We are committed to supporting Scottish higher education institutions to maintain the highest standards of research integrity. These shared standards underpin the excellent research produced in Scotland and are crucial to ensuring public trust in research.
3. Elements of this policy draw upon UKRI's [Policy on the Governance of Good Research Practice](#) and we would like to thank UKRI for permission for reuse. We would also like to thank members of the Scottish Research Integrity Network (SRIN) and research integrity leads within Research England and UKRI for their advice and expertise as the policy was developed.

## Policy scope

4. As a public funder of research and signatory to the Concordat, SFC has responsibilities to:
  - Only provide funding to organisations that can demonstrate that appropriate structures, policies, and procedures are in place to support integrity in their research activities.
  - Publish clear, proportionate, and relevant expectations of the organisations we fund. This includes publishing clear statements of what constitutes research misconduct and ensuring that recipients of funding are aware of requirements regarding the investigation and reporting of potential research misconduct.
  - Take appropriate action when research misconduct is reported to us, which may include actions related to individuals or review of the processes and systems of organisations to help them identify and act on issues.
5. This policy applies to Scottish higher education institutions which receive research and innovation funding from SFC. 'Institution' will be used in the remainder of the policy. The policy also applies to research activities which are directly funded by SFC.
6. SFC is not an appeals body for individual cases of alleged research misconduct and cannot provide support for institutions or individuals involved in investigations. Similarly, SFC does not grant ethical clearance for research projects and is unable to advise on research ethics. Details of how SFC will respond to allegations of research misconduct reported to us are set out below.
7. Any assessment of institutional strategies and infrastructure to support research integrity as part of the Research Excellence Framework (REF) is out of the scope of this policy.

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## Definitions

8. SFC uses the definition of research integrity provided in the Concordat: ‘research has integrity when it’s carried out according to the principles of the Concordat, and in a way that is trustworthy, ethical, and responsible’. The five key principles necessary to maintain the highest standards of research integrity are honesty, rigour, transparency and open communication, care and respect, and accountability.
9. We recognise that research practices can fall short for a number of reasons and that this often does not reflect the intent of researchers. SFC uses the Concordat’s definitions of questionable research practices and research misconduct, and we consider it helpful to differentiate between the two:
  - Questionable research practices – minor infractions or research practices, including avoidable errors, which fall short of the definition of intentional research misconduct. They may arise due to a lack of knowledge or attention to detail, negligence, or deliberate action, and may occur where there is no evident intention to deceive.
  - Research misconduct – the behaviours and deliberate actions that fall short of the five key principles of research integrity, occurring at any point in the research lifecycle. This may include fabrication; falsification; plagiarism; failure to meet legal, ethical and professional obligations; misrepresentation; and/or improper dealing with allegations of misconduct. (See [Annex A](#) for a full definition of research misconduct.)

## General responsibilities

### For institutions

10. We expect institutions receiving SFC funding to meet all the responsibilities for employers of researchers set out in the Concordat.
11. SFC is committed to working with the Scottish sector to build on existing good practice, not only to consider cases where high standards may not have been met. We note that this policy gives more attention to the investigation of questionable research practices and potential research misconduct than to other institutional responsibilities.
12. Commitments 1, 2, and 3 of the Concordat set out responsibilities to:
  - Maintain a research environment that values research integrity and creates the conditions necessary for honest errors to be openly admitted without undue detriment.
  - Develop transparent, robust, and fair research integrity related policies within an appropriate organisational governance structure.

- Demonstrate, through periodic review, that policies and procedures are in place to ensure that research is conducted in accordance with standards of best practice.
  - Support the research community to understand and act according to expected ethical, legal, regulatory and professional frameworks, obligations, and standards. This support includes providing and promoting training and development opportunities, along with adopting mechanisms to acknowledge, promote, and reward responsible research practice.
13. Institutions are expected to make details of first point(s) of contact for research integrity matters and named senior role(s) responsible for oversight of research integrity publicly available.
14. To support the principles of accountability and transparent and open communication, institutions are also expected to publish an annual statement on their website which reports on progress towards meeting the responsibilities outlined in the Concordat. This statement must be approved by the institution's governing body. SFC encourages the institutions we fund to use the [Concordat annual statement template](#), however this is not mandatory.
15. Institutions receiving SFC's core research grants are required to provide a link to their most recent annual statement on research integrity as part of their [Research Assurance and Accountability \(RAA\)](#) return.

### Investigating research misconduct allegations

16. Commitment 4 of the Concordat sets out institutional responsibilities to:
- Publish policies related to questionable research practices and research misconduct that are accessible to the research community and that include a confidential reporting mechanism through a named point of contact.
  - Maintain fair and transparent processes, manage conflicts of interest, use external advisers where needed, and offer appeals processes.
  - Prepare and, when necessary, provide training for those running investigations and serving as panellists.
  - Ensure investigations are completed in a timely manner, bearing in mind the need to support all parties involved.
  - Document the process, act on the outcomes, and, where concerns are upheld, ensure appropriate action is taken, avoiding the use of non-disclosure agreements.
  - Provide information to third parties as required under any formal agreements, such as with research funders or statutory bodies.
  - Take reasonable steps to protect all parties involved from undue pressure, victimisation, or unwarranted negative consequences.
17. The effective investigation of potential research misconduct, and management of

questionable research practices where this occurs, is necessary in order to maintain the highest standards of research integrity. Meeting these responsibilities is an important safeguard to ensure the trustworthiness of research in Scotland, as well as a driver of positive change in the research system.

## For individuals

18. Individuals engaged in research projects which are directly funded by SFC are expected to meet the 'research community' responsibilities of the Concordat. This includes responsibilities to:
  - Design, conduct, and report research in ways that embed integrity and ethical practice throughout.
  - Be open and transparent about their research methodologies, and honest when errors are made.
  - Comply with ethical, legal, regulatory and professional frameworks, obligations and standards as required by statutory and regulatory authorities, and by employers, funders and other relevant stakeholders.
  - Ensure that all their research is subject to ongoing, active and appropriate consideration of ethical issues.
  - Maintain trust in research, including by reporting any concerns of research misconduct and supporting any investigation.

## Research misconduct reporting

### Why reporting to SFC is required

19. Institutional reporting on formal research misconduct investigations supports SFC's broader research assurance work, particularly around safeguarding public funds and ensuring the integrity of the research activity we fund. SFC's research funding is primarily distributed in the form of unhypothecated awards such as our Research Excellence Grant (REG), which institutions can use flexibly to develop and support excellent research as best fits their individual circumstances. In this way, and by contributing towards the full economic cost of research as part of the UK's 'dual support' system, SFC funding underpins research across Scottish institutions.
20. The reporting requirements set out below also provide SFC with additional, and more up to date, information on formal research misconduct investigations being conducted in Scottish institutions, without the lag associated with annual report publication. This will enable SFC to more effectively assess and manage risk, support the sector in meeting the Concordat's principles, and understand if local research integrity policies are being adhered to consistently.

## Reporting requirements

21. Institutions in scope of this policy are required to inform SFC of the outcomes of any formal investigation of research misconduct. SFC should be informed immediately following the conclusion of any investigation, with a maximum delay of one month.
22. It is not necessary for institutions to inform SFC of allegations of research misconduct prior to the conclusion of any formal investigation. It is also not necessary for SFC to be informed if an allegation of research misconduct has been assessed at an initial or preliminary investigation stage and it is determined, either due to insufficient evidence or resolution through alternative action(s), that no formal investigation is required.
23. Reports on the outcomes of formal investigations should be marked as confidential and sent to [researchintegrity@sfc.ac.uk](mailto:researchintegrity@sfc.ac.uk). Each report should provide:
  - a brief factual statement about the nature of the allegation(s). The statement should cover the broad disciplinary area and time period in which the alleged misconduct took place and specify if the allegation(s) related to fabrication, falsification, plagiarism, failure to meet legal, ethical and professional obligations, misrepresentation, improper dealing with allegations of misconduct, a form of research misconduct not included in the Concordat definition, or multiple areas of concern.
  - the findings of the investigation including whether the allegation(s) were upheld (either partially or fully) or not upheld.
  - a timeline summarising key stages of the investigation process from the point an allegation was first received, commenting as appropriate on how this aligns with timescales set out in relevant institutional policies.
  - what actions are being taken if the allegation(s) were upheld. This may include referral for potential disciplinary action, retraction or amendment requests to publishers, and/or actions to mitigate the impact on ongoing research projects or other researchers.
  - what, if any, changes to policy and practice may be implemented in response to this case and what assurances will be put in place as to their effectiveness.
  - what, if anything, will be communicated publicly about the case.
24. If allegation(s) were upheld and the formal investigation findings are known to be being appealed, this should be noted in the report. We require institutions to update SFC if the outcome of any formal investigation changes following an appeal.
25. It is also expected that institutions disclose if a formal investigation has related, in whole or in part, to research supported by one of SFC's strategic research investments or to research conducted by a member of SFC's [Research & Knowledge Exchange Committee](#)

or [Board](#).<sup>1</sup>

26. This policy will take effect from **1 September 2026**. We recognise that existing institutional policies may not allow for the outcomes of formal research misconduct investigations to be reported to SFC and that this may limit reporting related to investigations that are currently live. We would expect institutional policies to be revised if necessary to ensure that reporting of future formal investigations can take place in line with SFC's requirements.

## Disclosure of personal information

27. Names and other details which may identify individuals accused of research misconduct ('the respondent(s)') should not routinely be disclosed to SFC.
28. SFC should also at no point be provided with:
- sensitive personal information, such as special category personal data, as defined in UK data protection legislation.
  - information relating to criminal offences or convictions.
  - personal details about third parties, such as the person making the allegation of research misconduct.
29. In order to support risk mitigation or management by SFC, we reserve the right to request identifying information in those cases outlined in paragraph 25 or in cases deemed to be high-risk (to the research record, to SFC funding, to SFC and/or to the Scottish sector's reputation). We also reserve the right to request a copy of the full investigation report in these cases if that information would inform our actions.
30. It will be possible for institutions to redact or provide relevant information in an alternative format if providing a copy of the full investigation report, where requested, would result in special-category personal data being shared with SFC. Redactions or provision of relevant information in an alternative format will also be possible to avoid the sharing of criminal offence data or third-party personal data.
31. Any concerns related to disclosing identifying information where requested can be discussed further, and in confidence, with SFC.

## How SFC responds to research misconduct reported by institutions

32. SFC will assess each report of proven research misconduct and will take action on a case-by-case basis in order to mitigate any identified risks. Any action taken will be proportionate and will pay due attention to safeguarding public funds. It is anticipated that no action from SFC will be required in the majority of cases.

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<sup>1</sup> Current strategic research investments considered in scope for disclosure are: Alliances for Research Challenges, the Hydro Nation Scholars Programme, the Scottish Graduate School for Arts and Humanities, the Scottish Graduate School of Social Science, and research projects supported by the Royal Society of Edinburgh.

33. In assessing either the outcomes of individual formal research misconduct investigations or outcome data reported over time, we may identify areas in which institutional policies and procedures can be improved. This information will be communicated to the institution's nominated contact(s) and we will ask to be updated on any revisions to local policies and procedures undertaken as a result.
34. We will send a formal letter setting out our concerns and areas for improvement if we identify systemic failures in governance or oversight of research integrity and the handling of research misconduct allegations, which may include consistent failure to respond to allegations promptly and objectively in line with institutional policies. We would expect any concerns be addressed in a timely manner and may take further action if an agreed improvement plan is not complied with. Further action could, if necessary, include restricting institutional applications to SFC strategic research funding opportunities or suspending all research funding from SFC until agreed improvements have been made.
35. If reports of proven research misconduct relate to current SFC strategic research investments, we may suspend the award(s) for a limited period of time until a remedial action plan is agreed and implemented. If it is not possible to identify or agree a remedial action plan, we may terminate the award(s).
36. Upheld allegations of research misconduct against members of SFC's Research & Knowledge Exchange Committee or Board will be dealt with in line with the standing orders of both bodies. Board and Committee members are expected to uphold high standards of integrity in line with the [Ethical Standards in Public Life etc. \(Scotland\) Act 2000](#), and their responsibilities are set out in the [Code of Conduct for Members of the Scottish Funding Council](#).
37. SFC does not have a remit to investigate the management of specific research misconduct cases.

## Allegations of research misconduct

38. Allegations of research misconduct should always be reported to the employing or enrolling institution of the person against whom the allegation is being made and should not be reported to SFC. SFC has no responsibility nor standing to investigate.
39. SFC is not a designated body for whistleblowers under the Public Interest Disclosure Act and individuals are not protected if they disclose allegations to us, unless they are direct employees of SFC.
40. If an allegation is made directly to SFC, we will recommend that the individual making the allegation report it to the employing or enrolling institution of the individual against whom the allegation is being made.
41. If SFC identifies a risk or allegation of research misconduct through independent means, for example media reports, or an anonymous complaint, we will refer the matter to the employing or enrolling institution.

## Monitoring compliance

42. As set out in paragraph 15, institutions receiving SFC's core research grants are required to provide a link to their most recent annual statement on research integrity as part of their Research Assurance and Accountability (RAA) return. These statements provide an overview of how Scottish institutions and their staff are supporting responsible research practices and actively working to create positive research environments. Over time, they are expected to demonstrate how the sector is making progress towards meeting the Concordat's principles and commitments, as well as providing publicly available data on the number of formal research misconduct investigations which are taking place in Scotland.
43. From AY 2027-28 onwards, SFC will monitor the number of upheld allegations of research misconduct included in annual statements to ensure that these are being reported to SFC at the point the investigation concludes.

## Information storage

44. We recognise that our reporting requirements may include disclosure of personal data. We consider that this is a necessary requirement in certain circumstances, as set out in paragraph 29, in order for SFC to fulfil our public interest duties. A privacy notice is available [on SFC's website](#).
45. It is the institution's responsibility to ensure that they have appropriate measures in place which enable them to share the required information with SFC. Institutions should not provide SFC with sensitive personal information (such as special category personal data, as defined in the UK GDPR), information relating to criminal offences or convictions, or personal details about third parties (such as the person making the allegation of research misconduct).
46. We also recognise that an allegation of research misconduct has the potential to do serious and lasting damage to the reputation of a researcher. Data regarding research misconduct investigations are therefore stored and processed appropriately, confidentially, securely and sensitively, and retained and/or released only where there is a legitimate reason for doing so.
47. All information provided to SFC relating to research misconduct investigations will be managed in accordance with the purposes outlined in this policy and managed in line with relevant SFC policies and retention schedules.
48. All information provided pertaining to a misconduct investigation is recorded by SFC to provide an audit trail. Each allegation is given a unique (e.g. alphanumeric) identifier. The information is recorded on a local log, which is maintained securely and confidentially. Access will be managed on a need-to-know basis in line with appropriate data handling protocols.
49. Aggregated data on formal research misconduct investigations will be stored securely on SFC's systems in order to track trends over time. This aggregated data will not include

personal information.

50. SFC may disclose information relating to upheld allegations, in confidence, to relevant statutory bodies, regulators, or funding partners. Decisions on disclosure will be informed by the seriousness of the proven misconduct and requirements to ensure appropriate consistency in approaches, investigations, and actions to mitigate risk undertaken by partners. SFC will inform institutions where information they have provided is shared.
51. All information held by SFC, as a public body, is subject to request under the Freedom of Information and Data Protection Acts. We treat each request on its own merits and will consult with all relevant organisations as appropriate, however decisions on disclosure will remain the responsibility of SFC.

## Policy approval and review

52. This policy was developed by SFC's Investment and Research Directorate and has been endorsed by SFC's Research & Knowledge Exchange Committee. It will be reviewed periodically.
53. If you require any further information, please contact [researchintegrity@sfc.ac.uk](mailto:researchintegrity@sfc.ac.uk).

Version number	Status	Revision date	Summary of changes
Version 1.0	Approved	May 2026	New policy

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## Annex A: Concordat to Support Research Integrity definition of research misconduct

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**Research misconduct** constitutes the behaviours and deliberate actions that fall short of the principles in Commitment 1 of the Concordat, occurring at any point in the research lifecycle. This includes behaviours associated with the ideation of research proposals, reviewing the work of others, and the reporting of research findings.

Research misconduct can take many forms, including:

- **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.
- **falsification:** inappropriately manipulating and/or selecting research processes, materials, equipment, data, imagery and/or consents.
- **plagiarism:** using other people’s ideas, intellectual property or work (written or otherwise) without acknowledgement or permission.
- **failure to meet** legal, ethical and professional obligations, for example:
  - 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.
  - breach of duty of care for humans involved in research whether deliberately, recklessly, or by gross negligence, including failure to obtain appropriate informed consent.
  - misuse of personal data, including inappropriate disclosures of the identity of research participants and other breaches of confidentiality.
  - 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.
- **misrepresentation** of:
  - data, including suppression of relevant results/data or knowingly, recklessly, or by gross negligence presenting a flawed interpretation of data.
  - involvement, including inappropriate claims to authorship or attribution of work and denial of authorship/attribution to persons who have made an appropriate contribution.

- interests, including failure to declare competing interests of researchers or funders of a study.
  - qualifications, experience, and/or credentials.
  - publication history, through undisclosed duplication of publication, including undisclosed duplicate submission of manuscripts for publication.
- **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.

Honest errors and differences in, for example, research methodology or interpretations, do not constitute research misconduct.