



UK Research Integrity Office response to the HEFCE consultation on proposed implementation of the Concordat to Support Research Integrity

March 2013

Question one: Do you agree that compliance with the research integrity concordat should be a condition of HEFCE grant?

Yes. The commitments outlined in the concordat build upon existing work on research integrity by many organisations, including the UK Research Integrity Office (UKRIO), and are complementary to many practices which are already in operation in the higher education sector.

UKRIO fully supports attempts to review and improve research governance, to protect research participants and the public, enhance the quality and ethical standards of research, and reduce bureaucracy and other burdens on researchers.

Question two: Do you agree that compliance with the research integrity concordat should be a condition of HEFCE grant?

UKRIO agrees that demonstrating compliance with the Concordat should be integrated into HEFCE's existing reporting requirements. As with the Concordat itself, this approach has the potential to demonstrate that the UK research community shares the values underpinning high standards of professional behaviour in relation to research, is clear about its responsibilities, and is prepared to act on them. We believe that, with a small number of further developments, HEFCE's proposed approach for demonstrating compliance with the Concordat could be very influential.

UKRIO has a number of questions about the detailed implications of HEFCE's proposed approach and is ready to work on them with HEFCE. This response discusses eight issues which in our view should be considered further before the proposed approach is adopted:

- i. The signatories to the Concordat should take a shared approach to requiring compliance as a condition of grant, harmonising their reporting requirements. We would hope that HEFCE's proposed mechanism for reporting compliance can be taken as part of a wider approach, one that will reduce the need for other funding bodies to introduce their own assurance mechanisms arrangements. The aim should be to avoid placing additional costs and burdens on researchers and institutions due to multiple reporting requirements.

We note that the Concordat states that funders of researchers will 'explore ways of streamlining requirements to reduce any duplication and inconsistency.' A public statement made on progress towards this goal would be welcomed.

- ii. The approach to compliance should in general be based on encouraging best endeavours and continuous improvement; while responding to instances of gross negligence or fraud. The signatories to the Concordat should consider how they can incentivise high standards of integrity and ethics in research, as well as dis-incentivising breaches of those standards.
- iii. Concerns have been expressed to UKRIO by a variety of higher education institutions – including those which subscribe to UKRIO and those which do not - that the Concordat does not contain clear benchmarks for compliance with the publication as a condition of grant from funding bodies. The commitments of the Concordat are deliberately broad, in order to accommodate institutional autonomy in how best to implement them. This feature is welcomed but has also generated concerns that an institution may choose an approach to implementation that differs greatly from the preferred approach(es) of funding bodies.

Any assessment of whether an institution is in compliance with the Concordat should recognise the need to account for institutional autonomy in the implementation of its commitments.

- iv. As well as recognising institutional autonomy in the implementation of the Concordat, the questions asked by HEFCE and other signatories to determine whether an institution is in compliance should recognise:
 - The need to avoid inadvertently encouraging a 'tick box' mentality regarding compliance with/ implementation of the Concordat. The proposed assurance mechanisms must not distract researchers and institutions from considering integrity as a matter of professional conduct rather than regulatory compliance.
 - The need for HEFCE and those who rely on its assurance mechanisms, to gather useful information on whether and – most importantly - how an institution complies with the Concordat. Questions must be broad enough to account for variation in how institutions have implemented the Concordat but not so broad as to generate only vague or brief answers.
- v. A variety of definitions of research misconduct are used in the UK, including that used in the Concordat as well as definitions in guidance produced by UKRIO, Research Councils UK and other bodies. HEFCE should make it clear which definition it uses and work with other bodies, including but not limited to research funders, to explore and address any discrepancies between its chosen definition and others which are in use.
- vi. When significant problems are reported to HEFCE, it should be open to seeking advice, in confidence, from bodies with expertise in issues of research integrity, such as UKRIO, to ensure that HEFCE has access to sufficient expertise when formulating its response to these problems.

- vii. UKRIO carries out a wide ranging programme of work to sustain and advance research integrity in institutions in receipt of funding from HEFCE, as do other bodies. HEFCE should consider how it could support these initiatives through appropriate sharing of anonymised data on issues and trends, in confidence as necessary.
- viii. We note that the HEFCE consultation document refers to the need for staff training (paragraph 23) and would hope that this be broadened to include training for research students. Most importantly, we would hope that any annual assurance questionnaire and return makes explicit mention of the need to protect the safety, wellbeing and rights of research participants and patients.

Notes

This submission draws upon the views of: the staff of UKRIO; its Trustees; members of its Advisory Board; and members of UKRIO's Register of Advisers, the experts who assist UKRIO in responding to questions and concerns about the conduct of research. It also draws upon the views of organisations and individuals who made comments to UKRIO concerning this consultation.

Our submission also draws upon UKRIO's extensive experience in the promotion of good research practice and addressing poor practice and misconduct. As the only dedicated research integrity body in the UK, UKRIO has amassed unmatched practical expertise in these issues.

In the event of any queries about this submission, please contact James Parry, Chief Executive, UKRIO on 01273 234 697 or at james.parry@ukrio.org.