

2024 Concordat to Support Research Integrity consultation

Attribution

This submission is on behalf of the [UK Research Integrity Office](#), the UK's national advisory body on research integrity. Established in 2006, UKRIO provides independent, expert and confidential support across all disciplines of research and covers all research sectors.

This submission is endorsed by the [UK Reproducibility Network](#), a national peer-led consortium that aims to ensure the UK retains its place as a centre for world-leading research. UKRN is a valuable part of the research ecosystem and UKRIO welcomes its endorsement of this submission.

Response to consultation survey

1. What is your name?

Stephanie Neave and James Parry.

2. What is your email address?

steph.neave@ukrio.org and james.parry@ukrio.org

3. What is your organisation?

UK Research Integrity Office (UKRIO) – www.ukrio.org

4. Which UK country do you consider yourself most closely affiliated with?

UKRIO's activities are UK-wide and not limited to any one country.

5. Is your submission in a personal capacity or on behalf of your organisation?

Organisation.

6. What is your job title?

Stephanie Neave: Chief Executive Officer; James Parry: Chief Innovation Officer.

7. What is your job role?

Stephanie Neave: Chief Executive Officer, UK Research Integrity Office; James Parry: Chief Innovation Officer, UK Research Integrity Office.

8. How important do you think the UK Concordat to Support Research Integrity is to the research sector?

Very important.

9. Please explain your answer if you wish to do so.

The Concordat is an essential component of the UK's research landscape, setting out clear commitments for researchers, employers and funders to safeguard and enhance both quality and ethical standards in research, and also systems and environments that promote a healthy research culture. It has enormous potential to drive meaningful change within the sector.

UKRIO fully endorses the principles communicated by the Concordat and has undertaken extensive work since publication of the first edition in 2012 to support the sector in embedding its principles in research systems, practices and culture. To ensure the Concordat fulfils its potential, it is important that there are mechanisms in place to hold research employers, funders and other actors to account if it is to be an effective governing document, though we must also ensure we avoid it becoming a burdensome box-ticking exercise.

That being said, in its current format, and with current and emerging threats to research integrity in mind (see our response to Question 27, below), the Concordat has significant areas of weakness which must be addressed:

- Previous in-depth analysis, such as the 2018 and 2023 reports by the House of Commons (then) Science and Technology Committee, have noted that uptake of the Concordat, and therefore its effectiveness, remain limited.
- UKRIO's 2024 report [Barriers to Investigating and Reporting Research](#), which summarised findings from an expert working group led by Tracey Brown OBE, identified a number of weaknesses within the Concordat which affects its effectiveness: *"The 'teeth' of the Concordat... arise from adherence being integral to the terms and conditions of research funders. However, there are significant weaknesses to this approach. First, individual grant contracts vary and therefore lack consistency. Second, there is no compliance body or system for reporting failures to uphold the Concordat. Third, take-up of the Concordat has largely been limited to funders within higher education, yet in 2021, 59% of total UK expenditure on research and development was from the business sector."*

During this revision process, it is crucial that these weaknesses are addressed and mechanisms are put in place to drive forward both greater adherence and adoption. Our strong recommendation is that any revisions made to the Concordat:

1. Ensure that the Concordat applies to the entire UK research base, all disciplines of research and all sectors, reaching beyond higher education, where it has traditionally had the higher uptake, to become truly national guidance.
2. Drive both take-up and adherence across research organisations, including private, public, and third sector organisations.

3. Ensure that those who have signalled their commitment are adhering to the Concordat, and thus supporting organisations and their employees to embed a robust and proactive approach to research integrity. This should, as a minimum, include a published register of all organisations which have committed to implementing the Concordat and, as currently required, annual reports on their research integrity provision.
4. Given that the Concordat should cover the entire UK research base, we suggest that the Research Integrity Concordat Signatories (RICS) Group expands to include additional representatives from other sectors.

Strengthening the Concordat in these ways will not only ensure that research integrity remains high on the agenda, but also support institutions to hold themselves to high standards - both key considerations in a challenging economic environment which could adversely affect the resourcing and prioritisation of research integrity. A revitalised Concordat will empower research integrity staff and those in related roles by providing much needed sectoral infrastructure to drive consistency and transparency.

Building on (3), above, we note that any compliance systems for the Concordat should:

- Be realistic, practical and proportional and in line with the findings from initiatives cutting unnecessary bureaucracy in the research sector (see below).
- Extend not only to employers of researchers but also to the other organisational actors in the system, such as research funders. Research and innovation involves many different types of organisation and each must be equally committed to research integrity, to ensure the highest levels of quality, efficacy and societal benefit.

As part of this incentivisation process and to help ensure employer buy-in, the reporting requirements associated with the Concordat – both those required by Commitment 5 and the related research integrity reporting mandated by research funders as part of their terms and conditions – should be streamlined and harmonised. This has been called for by research employers for many years and would reduce burdens and bureaucracy, freeing up time and resources for other employer-led activities to support good research practice and a healthy research culture. The revision of the Concordat should implement changes called for in the Independent Review of Research Bureaucracy (2022), the Concordats and Agreements Review (2022) and other initiatives to reduce unnecessary bureaucracy in research.

We recognise that the RICS Group may well need support to operationalise any strengthened Concordat. UKRIO and UKRN stand ready to take a more proactive role to do so, building on our considerable experience in supporting organisations to implement the Concordat in their research environments.

We also see this revision process as a key opportunity to update the Concordat to better reflect the research integrity challenges of today and tomorrow, including the rise of AI, as well as key developments in the research landscape, such as the growing recognition that a 'positive research culture' is vital to ensuring UK research is of the highest integrity. In our answers below, we provide a number of recommended additions to the relevant Commitments with this in mind.

10. How important is Commitment 1 to the maintenance of research integrity in the UK?

Very important.

11. Please explain your answer if you wish to do so.

This Commitment, like the other four, is an essential component of the Concordat and therefore very important to the maintenance of research integrity in the UK. Each of the five individual Commitments form part of a greater whole. Collectively they cover the five key aspects of research integrity; they support each other and while there is a degree of overlap, this is a useful feature as it not only illustrates but operationalises the interconnected nature of research integrity.

The impact that any Commitment can have on UK research integrity is dependent on how they can all be operationalised as part of the everyday policies, systems and culture of research organisations and as part of the everyday professional practice of researchers. Accordingly, a focus on assisting operationalisation must underpin the content of the Concordat Commitments, alongside applicability to every research sector and research discipline in the UK.

12. Please suggest any changes to Commitment 1 that you think would help to maintain research integrity in the UK (e.g. any additions, deletions, rephrasing, clarifications?)

Commitment 3 of the Concordat sensibly notes that research integrity applies to not only the behaviours and practices of individual researchers and research projects, but also to organisational policies, systems and environments – commonly termed 'research culture'.

This is not, however, included in the definition of research integrity in Commitment 1. This omission could serve to inadvertently suggest that research culture and research integrity are not interlinked areas and cause inefficiencies in the operationalisation of the Concordat and or research integrity/culture in general. We therefore recommend that the definition provided be expanded to explicitly state that it includes 'research culture'.

Recommended addition:

- Add as a new paragraph following "These core elements... peer review)" on page 6: "The core elements also apply to ensuring that environments and

systems for research, and the values and behaviours of those involved in research, safeguard and enhance good research practice, rather than hinder it – often described as ‘research culture’.”

13. How important is Commitment 2 to the maintenance of research integrity in the UK?

Very important.

14. Please explain your answer if you wish to do so.

See response to Question 11, above.

15. Please suggest any changes to Commitment 2 that you think would help to maintain research integrity in the UK (e.g. any additions, deletions, rephrasing, clarifications?)

As noted above, we recommend the Concordat be updated to reflect the key challenges and opportunities facing the research community, including the growing use of AI in research.

Recommended additions:

- Add as a third bullet point under “**Researchers** must:” (page 8):
“Be mindful that new/evolving techniques and technologies for research present both new opportunities for benefit but also opportunities for potential harm and ensure that they apply ethics reasoning and adhere to all relevant legislation, guidance and governance/ approvals in the use of any techniques/ technologies.”
- Add as a fifth bullet point under “**Employers of researchers** must:” (page 8):
“Provide guidance for researchers on ethical considerations relating to new/evolving techniques and technologies for research, as well as guidance and governance to ensure the appropriate use of such techniques and technologies in research.”

16. How important is Commitment 3 the maintenance of research integrity in the UK?

Very important.

17. Please explain your answer if you wish to do so.

See response to Question 11, above.

18. Please suggest any changes to Commitment 3 that you think would help to maintain research integrity in the UK (e.g. any additions, deletions, rephrasing, clarifications?)

Echoing the response to question 12, we recommend that Commitment 3 explicitly state that ‘research integrity’ includes the topic/issue of ‘research culture’.

Recommended additions:

- Add as a new paragraph following “We are committed... of researchers.”, on page 10:
“This ‘research culture’ is an essential component of research integrity and, as stated in Commitment 1, the core elements of research integrity apply to ensuring that environments and systems for research, and the values and behaviours of those involved in research, promote and enhance good research practice, rather than hinder it.”
- Add at the end of the sentence “systems within the research environment that identify potential concerns at an early stage”, on page 10:
“e.g. concerns about the use of AI in research.”
- Add at the end of the sentence “clear processes for any staff member to raise concerns about research integrity”, on page 10:
“... , which promote transparency, destigmatise allegations of research misconduct, and normalise early raising of concerns.”

We recommend the latter change to address a key finding of UKRIO’s recent report, *Barriers to Investigating and Reporting Research Misconduct*, further discussed under our response to Question 21.

19. How important is Commitment 4 the maintenance of research integrity in the UK?

Very important.

20. Please explain your answer if you wish to do so.

See response to Question 11, above.

21. Please suggest any changes to Commitment 4 that you think would help to maintain research integrity in the UK (e.g. any additions, deletions, rephrasing, clarifications?)

Our recent report, *Barriers to Investigating and Reporting Research Misconduct*, found that while much attention has been given in parliamentary and other discussions to a possible future regulator, there are immediate steps that can be taken to foster the culture, clarity, and confidence to more effectively address research misconduct. The Concordat was identified as a key mechanism to achieve this.

While we recognise that some recommendations (iii and iv) cannot be operationalised immediately, the Concordat is well-placed to recommend that these are taken forward and contain a commitment from the sector to begin work on this.

- i. The adoption of standardised requirements and procedures detailing how allegations of research misconduct are investigated and reported.
- ii. Professional research misconduct investigation training for all sectors undertaking research.
- iii. A flagging system that promotes transparency, destigmatises allegations of research misconduct, and normalises early raising of concerns.
- iv. National infrastructure to collect and report on research misconduct cases annually.

Our recommendation is that the following changes are made to Commitment 4:

- A. **In this Commitment, and throughout the entire Concordat**, terms such as "allegations of research misconduct" should be replaced with "potential breaches of research integrity". This mirrors practices already in operation in other jurisdictions and is a practical way to encourage raising of concerns – whether they relate to poor practice and avoidable errors, questionable research practice, or allegations of misconduct – destigmatise the process and make addressing issues less confrontational, [as discussed in UKRIO's Breaches in Research Integrity \(2023\)](#). Relatedly, we note that research integrity is often conceptualised in dichotomous terms (present or absent), whereas in practice there is a spectrum from best practice through questionable practice to fraud.
- B. **Reword the existing definition of research misconduct (page 12)** by adding under the sub-heading “failure to meet: legal, ethical and professional obligations, for example:”, a new bullet point “misuse of AI in research”.
- C. **Revise the section beginning “Employers of researchers have primary responsibility...” (page 13)** to include the following:

Employers of researchers have primary responsibility for investigating allegations of research misconduct. This responsibility includes:

- o *Adopting and using a nationally-agreed template process to investigate potential breaches of research integrity, such as UKRIO's Procedure for the Investigation of Misconduct in Research.*
- o *Using systems and language that destigmatise and normalise raising concerns.*

- *Ensuring that any person involved in investigating allegations has the appropriate knowledge, skills, experience and authority to do so, and has received formal training in carrying out/overseeing research misconduct investigations.*
- *Ensuring that the investigation is well documented and occurs over a reasonable timeframe, making appropriate reports on their investigation to involved parties.*

D. Revise the section beginning “Employers of researchers must:” (page 13) as follows:

Employers of researchers must:

- *Have clear, well-articulated and confidential mechanisms for reporting potential breaches of research integrity, using systems and language that destigmatise and normalise raising concerns.*
- *Adopt and use a nationally-agreed template process to investigate potential breaches of research integrity, such as UKRIO's Procedure for the Investigation of Misconduct in Research. This includes the use of independent external members of full investigation panels, clear routes for appeal, and collating summary data on investigations in a central internal repository.*
- *Provide a named point of contact or recognise an appropriate third party to act as confidential liaison for whistle-blowers or any other person wishing to raise concerns about the integrity of research being conducted under their auspices. This need not be the same person as the member of staff identified to act as first point of contact on research integrity matters, as recommended under commitment 3.*

Please note that the third paragraph above is existing text moved from page 14; otherwise the continuation of the employers' responsibilities section on page 14 remains the same.

E. Revise the section beginning “Funders of research must:” (page 14) to the following:

Funders of research must:

- *Adopt the Concordat's definition of research misconduct in their policies, systems and materials, and use systems and language that destigmatise and normalise raising concerns, [as discussed in UKRIO's Breaches in Research Integrity \(2023\)](#).*
- *Publish clear statements of what constitutes research misconduct, i.e. the Concordat's definition.*

Please note that the funders' responsibilities section on page 14 otherwise remains the same.

22. How important is Commitment 5 the maintenance of research integrity in the UK?

Very important.

23. Please explain your answer if you wish to do so.

See response to Question 11, above.

24. Please suggest any changes to Commitment 5 that you think would help to maintain research integrity in the UK (e.g. any additions, deletions, rephrasing, clarifications?)

The current requirements for the content of annual institutional research integrity statements are not balanced, with four of the five requirements covering information relating to research misconduct systems and investigations. While it is essential to continue to capture this information, institutional efforts to safeguard and enhance research integrity must go far beyond responding to allegations of research misconduct and the annual report structure should reflect that. The reports should give ample space for institutions to showcase their positive measures to support research integrity, including research culture, and demonstrate their continuing improvement year-on-year. Retaining the current skewed structure will not only bias reporting, but may inadvertently incentivise institutions to focus on addressing research misconduct and less so on other, equally important, aspects of research integrity. This changed structure should then be reflected in a revised template for annual reports.

UKRIO supports the analysis of annual statements which has been carried out by the RICS Group and by the UK Committee on Research Integrity, and this analysis should continue so the sector can understand trends, keep aware of good practice and emerging challenges, and identify gaps in research integrity provision or reporting.

To incentivise employer engagement with reporting, we recommend that the Concordat ask funders commit to harmonisation and streamlining of their reporting requirements for employers, including exploring whether the annual institutional research integrity statements could replace some of the required reporting by individual funders. This would be in accordance with the principles outlined in the Independent Review of Research Bureaucracy (2022) and other initiatives to reduce unnecessary bureaucracy in research.

UKRIO notes that some annual reports are still submitted to UKRIO, where institutions mistakenly believe that we collate this information instead of the Signatories Group. Consequently, we recommend the Concordat implement a clear, web-based submission system for annual reports and provide links to each

of these annual statements in the proposed register of organisations which have committed to implementing the Concordat (see response to Question 9). Making the list of these organisations (and their respective annual reports) publicly and easily accessible will drive accountability and incentivise uptake.

25. What do you think of the length of the current Concordat?

About right.

26. Are there changes to the format of the Concordat that you think would help to make it as useful as possible?

Plain language, Accessibility standards, Html, Downloadable pdf.

We note that ensuring that the Concordat is relevant and applicable to all sectors and roles involved in research will require careful consideration of the document's content and language, and how it is disseminated following its revision.

27. The Concordat was last reviewed in 2019. Are there any changes to research or research governance that you think should now be included in the Concordat to make it as useful as possible?

The revision process should be informed by these developments in good practice in research integrity since 2019:

- European Code of Conduct for Research Integrity (2023).
- UKRIO Code of Practice for Research (2023).
- UKRIO Procedure for the Investigation of Misconduct in Research (2023).
- EU Living guidelines on the responsible use of generative AI in research (2024).

The revision process should reflect the following themes/agendas which have developed greatly since 2019:

- AI in research, including but not limited to generative AI in research.
- Trusted Research / dual use of concern.
- Responsible Research and Innovation.

28. Do you have any further comments about the content or governance of the UK Concordat to Support Research Integrity?

The Concordat's Commitments set out requirements for three of the key actors in the research system: researchers, employers and funders. However, it currently lacks requirements for the fourth key actor: organisations that disseminate research, such as publishers. While the Concordat has a UK focus and many publishers are international bodies, this does not mean that the Concordat should shy away from setting out high level requirements for research integrity which are relevant for publishers. Requirements for publishers should include,

under Commitment 4, engaging collaboratively and transparently with employers of researchers when concerns are raised about research misconduct, during investigations and when investigation outcomes are reported and actioned.

29. Would you be happy for your contact details to be shared with a member of the signatories group about potential further consultation involvement.

Yes.

Further information

For further information on this submission, please contact James Parry at james.parry@ukrio.org