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British Academy comments on *The Concordat to Support Research Integrity*

May 2012

1. The British Academy endorses *The Concordat to Support Research Integrity* and believes that it will play an important role in setting out standards of research integrity within UK institutions. We do however have some comments that could serve to strengthen the Concordat and ensure that it has relevance for all researchers working within the UK higher education sector.
2. The commitments are welcome. To some extent, they may seem like obvious statements, but we believe the Concordat offers a valuable opportunity to reaffirm the importance of research integrity, and underline the various roles that people working within the sector have to play to maintain that integrity.
3. It is important that the Concordat encompasses research of all kinds and does not create an impression that it is focused mainly on medical and life sciences research, with add-ons for other forms of research. Phrases such as ‘...the concordat draws on a number of existing definitions in a way that is applicable to all areas of research **including the arts, humanities and social sciences**’ (page 7, our emphasis), ‘...in particular to human and animal subjects involved in research.’ (page 9) and references to ‘patients’ (page 12) could lead some to infer a bias towards particular research areas. It would be useful to note ethical dilemmas or legal considerations that arise within other areas of research to avoid the appearance of any particular bias – for example, considerations about the use of personal data collected for administrative purposes by Government departments, copyright issues or rules regarding research into human remains.
4. The focus of the Concordat is on the employers and funders, who, via employment contracts and grant conditions, impose restrictions on researchers. It would be useful if the Concordat also stated that employers have a responsibility to support researchers and provide information and assistance. Not all questions of research integrity are straightforward: researchers ought to be able to get guidance on tackling tricky issues. It is also important to recognise and acknowledge the autonomy of researchers, and their right to challenge established practices.
5. The Concordat includes mention of legal and professional rules, which are clear and stated, but it would be helpful to explore in more detail various ethical obligations. Who defines them? What about tricky or contested issues? What about the right of research to challenge these various frameworks?

6. The British Academy funds individual academics to pursue specific research projects, as do other similar organisations. We would not want the opportunities available to individuals so funded to be restricted in any way if an employing institution was not a signatory to the Concordat. Suggesting that adoption of the Concordat by institutions as a condition of grant should not have negative consequences for individual academics. For example, it would be unfortunate if the eligibility of an individual to access awards were restricted because of a position taken by an institution.

7. The British Academy has extensive expertise in ethics and standards of research in humanities and social sciences, and in peer review. Following the publication of the Concordat, should there be a desire to explore these areas in more detail, we would certainly be willing to participate.

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