

Revised Concordat to Support Research Integrity

Consultation response

April 2019

Background

The Concordat to Support Research Integrity was published in 2012. In 2018, a report into research integrity published by the Commons Science and Technology Committee recognised the value of the concordat to support research integrity but concluded that the concordat to support research integrity should be tightened so that compliance can be more easily assessed, with a timetabled route-map to securing 100% compliance.

Since the publication of the report, the signatories of the concordat have met to consider how to clarify the existing principles and commitments of the concordat. The revised concordat makes expectations clearer and requires institutions to submit information to the secretariat. Going forward, implementation of the commitments will be monitored. The commitments of the concordat are intended to be proportionate, addressing legitimate concerns about transparency while recognising that universities are operating in an increasingly challenging environment. The commitments are suitable to a range of institutions of different sizes and level of resource.

The consultation focusses on whether the expectations set out in the concordat are clear and whether they are proportionate.

Further information about the Concordat and the consultation can be found at <https://www.universitiesuk.ac.uk/policy-and-analysis/reports/Pages/research-concordat.aspx>

Response

Overview

4. Is the summary of the commitments set out on page five of the draft concordat clear?

No

4a. If you answered no, please explain your answer

As the UK's National Academy for Humanities and Social Sciences, the British Academy recognises the importance of the issue of research integrity for the quality and reputation of the research produced in the UK. We welcome the sector-wide approach the Concordat has brought. We view the Concordat as an important tool in creating a research culture which values integrity and in which misconduct is seen as unacceptable. We believe the summary of commitments reflects this and enables an approach to research integrity which is sector-owned.

While we welcome the intention of the revised Concordat to be clearer about the expectations on different actors in the research ecosystem, the revised version has become considerably longer and less focused. If we are to achieve effective engagement with the Concordat among all researchers, not just individuals who work in the area of research integrity day to day, it needs to be as short and targeted as possible. Publication of the final version should make use of web-based technology to make the core content accessible to all readers with further detail available to those who require it.

However, we would welcome more clarification in the Concordat on how 'signatories' and 'supporters' are defined. At present, the rationale which brings together the identified signatories is unclear, as they include selected public and charitable funders of research, and the representative body for most universities, but not other organisations which may undertake research within the higher education sector (most obviously, many of the members of GuildHE). The revised Concordat should clearly define the basis on which organisations may become 'supporters' of the Concordat, and what responsibilities this entails, in terms of the commitments of the Concordat.

The Introduction to the Concordat acknowledges the importance of the autonomy of employers of researchers; it should also acknowledge the autonomy of funders to determine how to allocate their funds, within the framework of the Concordat. It should also be noted that while the large majority of researchers are employed by organisations such as universities or research institutes, a small proportion do work without institutional affiliation, and therefore the Concordat should acknowledge that research integrity matters will not always be covered by institutional or organisational frameworks.

5. The final version of the concordat will include a checklist that sets out the expectations of researchers, funders of research and employers of research. Are there other materials that would help you or your organisation meet the commitments of the concordat?

It is important that the Concordat itself remains short, clear and focused. It is already proposed to include links to additional materials and useful resources at the end of the Concordat and this should be sufficient.

Maintaining the highest standards of research integrity

This section asks you to provide feedback on commitment one of the research integrity concordat, Maintaining the highest standards of research integrity, which is set out on pages 10-11.

6. The concordat identifies honesty, rigour, transparency and open communication, and care and respect, as the four core elements of research integrity. Are there other elements that should be identified?

We recognise that many of the most pressing concerns and high profile cases of research integrity or misconduct have tended to relate to research in science and medicine. Nevertheless, although it has not attracted the same attention, research integrity does also pose questions for the humanities and social sciences, particularly in relation to the rigorous use of data, ethical behaviour in the conduct of research, and plagiarism, including the obligation on researchers to acknowledge the work of others on which it draws or depends. The proposed definition appropriately recognises the diversity of research, and hence the considerations for integrity, across the discipline range.

7. The requirements in this section of the concordat have been updated to clarify the different responsibilities of researchers, employers of researchers and funders of research. Are the expectations of the concordat clear? (Use the free text box below if you have additional comments).

We welcome the emphasis in this section on the responsibility researchers must take for the decisions they make, supported by employers and funders.

It would be helpful to be absolutely clear that ‘all aspects of research’ include the conduct of research as well as the proposal, publication and review stages.

7a. For researchers?

No

If you answered no, please explain your answer

While the expectations as stated are clear, they could also indicate the responsibility of the researcher to seek further guidance or training is necessary to enable them to meet the expectations.

7b. For employers of researchers?

No

If you answered no, please explain your answer

The final bullet is wordy, and largely duplicates the first bullet which refers forward to the other commitments of the Concordat. In order to emphasise the need for procedures in addition to a general commitment to a positive research environment, it could simply state ‘Demonstrating that they have processes in place to ensure that research is conducted in accordance with standards of best practice’.

We welcome the third bullet point, which places an expectation on employers to defend research when they live up to the expectations of the Concordat in difficult circumstances.

7c. For funders of research?

Yes

If you answered no, please explain your answer

8. Are the revised expectations proportionate? (Use the free text box below if you have additional comments).

No further comments

8a. For researchers?

Yes

If you answered no, please explain your answer.

8b. For employers of research?

Yes

If you answered no, please explain your answer

8c. For funders of research?

Yes

If you answered no, please explain your answer

9. Are you confident that your organisation will be able to implement commitment one of the concordat?

Yes

If you answered no, please explain your answer.

10. If you have further comments on this section of the concordat to support research integrity, please use the free text box provided.

As a research funder, the British Academy already meets the expectations of this commitment, through its Code of Practice (<https://www.thebritishacademy.ac.uk/code-practice>), requirements in the application process for awards, and our terms and conditions of grant.

Ethical, legal and professional frameworks

This section asks you to provide feedback on commitment two of the research integrity concordat, Ethical, legal and professional frameworks, which is set out on pages 12 -13.

11. The expectations in this section of the concordat have been updated to clarify the different responsibilities of researchers, employers of researchers and funders of research. Are the expectations of the concordat clear? (Use the free text box below if you have additional comments).

We welcome the emphasis in the third expectation under ‘researchers’ that consideration of ethical issues is an ongoing matter throughout the course of research being undertaken.

11a. For researchers?

Yes

If you answered no, please explain your answer

11b. For employers of researchers?

No

If you answered no, please explain your answer

The first two bullet points overlap, and could be simplified to state ‘have clear policies on ethical review and approval and make sure researchers are aware of these’.

More significantly, there is no reference within these expectations to employers of researchers implementing these policies, which they should do in a consistent way and subject to regular evaluation of whether they remain fit for purpose and effective.

11c. For funders of research?

No

If you answered no, please explain your answer

While we agree with the aims which these expectations seek to achieve, there are several points on which further clarification is needed.

Bullet point 1: given the diversity of research funders within the UK higher education sector, the extent to which streamlining of requirements to reduce duplication and inconsistency will be possible may be limited.

Bullet point 4: the Academy is actively seeking to provide funding to smaller organisations and Independent Research Organisations, and would consider it unfortunate if the expectation to ‘only provide funding to organisations that can demonstrate that appropriate structures are in place to ensure research integrity in their research activities’ was interpreted to mean that funding was restricted to formal ‘supporters’ of the Concordat.

12. Are the revised expectations proportionate? (Use the free text box below if you have additional comments).

No further comments.

12a. For researchers?

Yes

If you answered no, please explain your answer.

12b. For employers of research?

Yes

If you answered no, please explain your answer

Though note comments under 11b above relating to the implementation of policies.

12c. For funders of research?

No

If you answered no, please explain your answer

We agree that these expectations are proportionate, subject to the clarifications requested under 11c above. In addition, for these expectations of funders to be proportionate, they should acknowledge that the extent to which funders are able to monitor ongoing compliance, after an award is made, is limited, and depends on the reporting requirements set by each individual funder. Any expectation of additional monitoring by funders would be unnecessarily burdensome on both the funder and the funded organisations.

13. Are you confident that your organisation will be able to implement commitment two of the concordat?

Yes

If you answered no, please explain your answer

Subject to the clarifications and provisos noted above.

14. If you have further comments on this section of the concordat to support research integrity, please use the free text box provided.

No further comment.

Embedding a culture of research integrity

This section asks you to provide feedback on commitment three of the research integrity concordat, Embedding a culture of research integrity, which is set out on pages 14-15.

15. The expectations in this section of the concordat have been updated to clarify the different responsibilities of employers of researchers and funders of research. Are the expectations of the concordat clear? (Use the free text box below if you have additional comments).

We view the Concordat as an important tool in creating a research culture which values integrity and in which misconduct is seen as unacceptable. We believe that the research community itself should take the lead in developing this environment. We are therefore surprised that there are no expectations on researchers listed under this commitment. We believe that researchers have a responsibility to engage with practices which lead to a positive research environment, and to support their employers to develop and implement these practices.

15a. For employers of researchers?

Yes

If you answered no, please explain your answer

15b. For funders of research?

No

If you answered no, please explain your answer

We agree with the aims the expectations are seeking to achieve, but there is duplication and overlap between the expectations which could therefore be more clearly expressed. We would suggest that the following three points could be simplified into a single expectation:

- promote adoption of the concordat within the research community
- support the implementation of the concordat through shared guidance, policies and plans
- work in partnership with employers and researchers to embed a culture of integrity in the research community

It would also be helpful if the expectations here explicitly recognised the potential for funders to work together, not simply bilaterally with employers and with researchers, as this may be a more efficient way to achieve these expectations, given that employers, and potentially researchers, will probably be engaging with multiple funders.

16. Are the revised expectations proportionate? (Use the free text box below if you have additional comments).

No further comment

16a. For employers of research?

Yes

If you answered no, please explain your answer

16b. For funders of research?

Yes

If you answered no, please explain your answer

17. Are you confident that your organisation will be able to implement commitment three of the concordat?

Yes

If you answered no, please explain your answer

18. If you have further comments on this section of the concordat, please use the free text

box provided.

No further comments

Dealing with allegations of research misconduct

This section asks you to provide feedback on commitment four of the research integrity concordat, Dealing with allegations of research misconduct, which is set out on pages 16-17.

19. The expectations in this section of the concordat have been updated to clarify the different responsibilities of researchers, employers of researchers and funders of research. Are the expectations of the concordat clear? (Use the free text box below if you have additional comments).

The section covers appropriately how allegations of research misconduct will be handled where researchers have an employer. A small proportion of researchers in arts, humanities and social sciences work as independent scholars, and this section should acknowledge the potential additional role of funders in these circumstances. The British Academy requires independent researchers to make clear when applying for funding how ethical issues will be managed.

This section is considerably more detailed than other parts of the Concordat and consideration should be given as to whether it could be simplified by cross referring to other sources.

19a. For researchers?

Yes

If you answered no, please explain your answer

19b. For employers of researchers?

No

If you answered no, please explain your answer

The comment under 19 above about the volume of detail in this section applies particularly to how the expectations are articulated. While they are in themselves clear, they are lengthy.

19c. For funders of research?

Yes

If you answered no, please explain your answer

20. Are the revised expectations proportionate? (Use the free text box below if you have additional comments).

No further comments.

20a. For researchers?

Yes

If you answered no, please explain your answer.

20b. For employers of researchers?

Yes

If you answered no, please explain your answer

20c. For funders of research?

Yes

If you answered no, please explain your answer

21. Are you confident that your organisation will be able to implement commitment four of

the concordat?

Yes

If you answered no, please explain your answer

22. If you have further comments on this section of the concordat to support research

integrity, please use the free text box provided.

No further comment

A commitment to strengthening research integrity

This section asks you to provide feedback on commitment five of the research integrity concordat, A commitment to strengthening research integrity, which is set out on pages 19 -20.

23. The expectations in this section of the concordat have been updated to clarify the different responsibilities of the of employers of researchers and funders of research. Are the expectations of the concordat clear? (Use the free text box below if you have additional comments).

Please see comments under 4a above regarding the rationale which brings together the signatories of the Concordat. In terms of sharing of practice through the annual forum, and the annual narrative statement on research integrity, it will be important that these draw on input from a wide range of stakeholders beyond the current signatories, if they are to genuinely reflect progress in improving practice on research integrity across the whole research community.

23a. For employers of researchers?

No

If you answered no, please explain your answer

The first bullet point duplicates the first expectation set out under Commitment 1. It could be removed here without weakening the overall commitment.

23b. For funders of research?

Yes

If you answered no, please explain your answer

24. Are the revised expectations proportionate? (Use the free text box below if you have additional comments).

No further comments

24a. For employers of research?

Yes

If you answered no, please explain your answer

24b. For funders of research? Yes

Yes

If you answered no, please explain your answer

25. Are you confident that your organisation will be able to implement commitment four of the concordat?

Yes

If you answered no, please explain your answer

26. If you have further comments on this section of the concordat to support research integrity, please use the free text box provided.

No further comments

Implementation of the concordat's commitments

27. Please could you provide details of any operational issues that might hinder implementation of the concordat that you have not already identified in the responses above.

No further comments

28. How long do you think it will take your organisation to implement the commitments set out in the revised concordat?

The British Academy already meets the large majority of expectations on research funders set out in the revised Concordat. We would welcome opportunities to work alongside other funders in areas which require cooperation and anticipate that the annual research integrity forum will provide a mechanism for this.

29. Would your organisation value a training session on research integrity, focused on the requirements set out in this concordat?

No

Tell us about your training needs in the free text box provided.

N/A

Definitions

30. Are the definitions set out in Annexe I of the draft concordat fit for purpose? The definitions are set out on page 21.

No

If you answered no, please explain your answer.

It would be helpful for the definition of ‘funders of research’ to clarify whether it includes business and industry funders. The role of Government as a funder of research could also be explicitly described here, and how their commitment to research integrity is demonstrated.

Under ‘other organisations’, Independent Research Organisations should be explicitly included.

Useful Resources

31. The existing concordat sets out a series of resources that might be useful to researchers and employers of researchers. Are there specific resources you would identify as useful that might be included in this section of the Concordat? Where possible, please link to documents or web pages.

No further comments

32. The signatories are committed to looking at the provision of information and guidance that might support the further development of research integrity in the UK. Are there any resources that you think might be useful to produce?

The challenge of improving integrity in research cannot be resolved through approaches which apply only to the UK. Research is a global endeavour: the advancement of knowledge in the UK relies on research conducted in an increasing number of countries across the world, and UK researchers collaborate internationally. Measures to promote the sharing of good practice therefore need to extend beyond national boundaries, looking to raise expectations wherever research is conducted.