Implementing the Concordat to Support Research Integrity: Action Plan

Issue
The University is required to comply with the Concordat to Support Research Integrity by the end of 2013-14 as a condition of the HEFCE grant.

Timing of Decisions
HEFCE have stated that for 2013-14 only, in recognition that compliance by some institutions may require a period of time to achieve, institutions in receipt of research grant from the Council may provide assurance either of their compliance, or that they are working towards compliance, with the Concordat.

Background
The Concordat to Support Research Integrity was published by Universities UK in collaboration with HEFCE, Research Councils UK, the Wellcome Trust, the Department for Employment and Learning and the National Institute for Health Research in July 2012.

Further information
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Financial and Risk implications
Failure to include in the annual assurance statement to HEFCE for the 13/14 academic year a statement that confirms compliance or evidence of working towards compliance would put the university in breach of the conditions its funding letter from HEFCE.

Public presentation
This document is suitable for public disclosure.
<table>
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<th>Concordat to Support Research Integrity (commitments)</th>
<th>Current policies and practice</th>
<th>Gap/area for enhancement</th>
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<td>1. Maintaining the highest standards of rigour and integrity in all aspects of research.</td>
<td>The University seeks to maintain the highest standards of rigour and integrity in all aspects of its research and has in place a number of policies and guidance documents to support this including: the Ethical Policy Framework, the Academic Regulations, postgraduate researcher (PGR) Supervisors Handbook, PGR Handbook and Employee Handbook. The Research Environment Statements for each of the areas supervising PGRs are annually reviewed to ensure that students are provided a good research environment. In terms of governance the Academic Board has established the Research Ethics Committee to oversee aspects of research integrity with a particular focus on research ethics. Processes are in place to investigate alleged research misconduct by staff or students. The staff development programme has specific sessions on research ethics and this year new sessions on research integrity have been scheduled. Furthermore there is online training available through the Epigeum Research Masters programme.</td>
<td>Research integrity and associated matters of researcher misconduct are covered in different places in the University and sometimes fall under a general category within research practice. A single statement that brings together this information and clearly identifies the responsibilities of the individuals and the University in terms of research integrity would help support individuals and processes relevant to research integrity, it would also serve as a public statement of commitment to the Concordat (see Commitment #5). Furthermore, it may be helpful to make more explicit the responsibilities relating to research integrity in the relevant documents/policies see ‘Current policies and practice’</td>
<td>Develop and implement a University Researcher Code of Practice, drawing from best practice in the sector, and cross referencing relevant existing university policies and processes where appropriate. Consider whether the responsibilities relating to research integrity could be made more explicit in relevant University policies and documentation. Continue to develop and enhance activities to support the embedding of the principles of research integrity in the University’s research environment through staff development and related events.</td>
<td>REEO</td>
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2. Ensuring that research is conducted according to appropriate ethical, legal and professional frameworks, obligations and standards.

Researchers will:
• ensure that all research is subject to active and appropriate consideration of ethical issues
• comply with ethical, legal and professional frameworks, obligations and standards as required by statutory and regulatory authorities, and by employers, funders and other relevant stakeholders

Employers of researchers are responsible for:
• having clear policies on ethical approval available to all researchers
• making sure that all researchers are aware of and understand policies and processes relating to ethical approval
• supporting researchers to reflect best practice in relation to ethical, legal and professional requirements
• having appropriate arrangements in place through which researchers can access advice and guidance on ethical, legal and professional obligations and standards

Funders of research will expect researchers and employers of researchers who receive funding to conform to the ethical, legal and professional standards relevant to their research; this includes any specific codes of practice, legal requirements and other policies that the funder identifies as part of their conditions of grant.

Policies and guidance documents relevant to this commitment include: the Ethical Policy Framework (1.2.2-18), Data Protection Policy, Data and Systems Security Policy, Financial Regulations (see section 8 - 'whistle blowing' policy), Anti-Corruption and Anti-Bribery Policy, Intellectual Property Policies (Employees and Students).

The Ethical Policy Framework makes reference to the professional frameworks of the British Psychological Society and British Education Research Association however there are other professional frameworks that are relevant to the activities of researchers at the University that are not explicitly referenced.

The Ethical Policy Framework requires all research to undergo ethical review and describes a process of approval, maintained by the Research Ethics Committee, that empowers supervisors at local level to approve applications for ethical review that have lower risk of potential harm/distress and exercises more rigorous scrutiny for research projects that engender higher risk through the Research Ethics Committee Approvals sub-group.

The Research Ethics Committee has the specific duty to provide guidance to staff and students on ethical matters relating to research (Terms of Reference, 6.2).

Where appropriate the University seeks advice from external experts e.g. solicitors.

The staff development programme includes sessions on research ethics (See above).

Review whether information on all relevant professional frameworks is sufficiently clear in relevant documentation, particularly the Ethical Policy Framework, and also other documentation where a consideration of research ethics is required e.g. module handbooks.

REEO and Departments (working with other relevant professional services)
3. Supporting a research environment that is underpinned by a culture of integrity and based on good governance, best practice and support for the development of researchers.

Researchers should take a proactive role in their own personal development. Embracing this responsibility plays an important part in nurturing a culture of research integrity.

Employers of researchers will:
• embed these features in their own systems, processes and practices
• work towards reflecting recognised best practice in their own systems, processes and practices
• implement the concordat within their research environment

The concordat also recommends that employers of researchers should identify a senior member of staff to oversee research integrity and to act as first point of contact for anyone wanting more information on matters of research integrity.

Funders of research are responsible for:
• promoting adoption of the concordat within the research community
• supporting the implementation of the concordat through shared guidance, policies and plans

The University supports its researchers in their professional development as confirmed by the recent award of the HR Excellence in Research award which is based on an action plan to further enhance the support that the University provides to its researchers.

Documents evidencing a culture of integrity and support for the development of researchers

University Research Strategy (1, 2, 4, 5), Staff Development Policy, Academic Career Progression Promotion to Reader, Professor and Teaching Fellow, Terms and Conditions for Professor, Reader and Teaching Fellow, Human Resources Strategic Plan, Equality & Diversity Policy,

The University needs to achieve the action plan in support of the Concordat to Support the Career Development of Researchers in addition further steps could be made to implement the Concordat to Support Research Integrity at level of the Department and individual.

At the University level, in practice the Director of Research is the first port of call for information relating to research integrity although this could be made more explicit e.g. as part of the Researcher Code of Conduct (see Commitment #1) and on the Research Moodle and other documents. Oversight of research integrity currently falls within the remit of the Research Ethics Committee, it would be useful to consider whether a specific individual, e.g. Director of Research or Chair should be identified to maintain the oversight as per the recommendation for this Commitment.

This should be considered alongside the requirements of Commitment #4 and identification of an individual or body to act as confidential liaison in cases of alleged research misconduct.

See also comments under Commitment #1 and the recommendation to develop Researcher Code of Conduct.

Monitor the achievement of the action plan in support of the Concordat to Support the Career Development of Researchers.

Consider further activities to support personal development of researchers and use of available resources e.g. Epigeum, Vitae.

Make explicit and disseminate the contact details of the individual(s) identified to oversee research integrity and to act as first point of contact for anyone wanting more information on matters of research integrity.

Consider further steps could be made to implement the Concordat to Support Research Integrity at level of the Department and individual (including students). There may be opportunity to embed Research Integrity more fully in the PG Cert in Teaching and Learning in HE and working closely with the Learning and Teaching Practice and Development Group to support research integrity as it relates to undergraduate students.

REEO, Research Committee working with HR colleagues

REC

REEO working with Heads of Academic Departments and/or research leads in departments.

REEO and LTPDG to
4. Using transparent, robust and fair processes to deal with allegations of research misconduct should they arise.

Researchers will:
• act in good faith with regard to allegations of research misconduct, whether in making allegations or in being required to participate in an investigation
• handle potential instances of research misconduct in an appropriate manner; this includes reporting misconduct to employers, funders and professional, statutory and regulatory bodies as circumstances require.

Employers of researchers have the primary responsibility for investigating allegations of research misconduct. It is the responsibility of employers to ensure that any person involved in investigating such allegations has the appropriate knowledge, skills, experience and authority to do so.

Employers of researchers should already:
• have clear, well-articulated and confidential mechanisms for reporting allegations of research misconduct
• have robust, transparent and fair processes for dealing with allegations of misconduct that reflect best practice
• ensure that all researchers are made aware of the relevant contacts and procedures for making allegations
• act with no detriment to whistleblowers making allegations of misconduct in good faith
• provide information on investigations of research misconduct to funders of

The University processes to deal with allegations of malpractice and research misconduct are covered in the Academic Regulations (students) and Disciplinary Policy and Procedure (staff):
• Students - Academic Regulations (9.3.2 - 9.3.6, 11.3) - definitions of 'misconduct' and procedures for investigating and dealing with.
• Staff - Disciplinary Policy and Procedure

The University's Public Interest Disclosure Policy and Procedure – (PIDP & P) covers 'whistle blowing' - staff and students.

Whilst policies and procedures are in place to cover investigations of research misconduct and malpractice the guidance is not specific.

The UK Research Integrity Office provide a specific set of guidelines on dealing with matters of alleged research misconduct and malpractice which are being taken up and implemented in other HEIs.

Furthermore, whilst the University has a pool of individuals with appropriate skills and experience to investigate allegations of research misconduct and malpractice more might be done to ensure that those individuals are fully up to date with best practice.

Consider the adoption of specific guidance relating to research misconduct and malpractice for research staff (linked to University Researcher Code of Practice above).

Consider amending the Public Interest Disclosure Policy to include specific reference to research misconduct and malpractice.

Consider defining 'research misconduct' more explicitly within the Academic Regulations.

Identify a named point of contact or recognise an appropriate third party to act as confidential liaison for whistleblowers or any other person wishing to raise concerns about the integrity of research being conducted under their auspices.

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research and professional and/or statutory bodies as required by their conditions of grant and other legal, professional and statutory obligations

- support their researchers in providing appropriate information to professional and/or statutory bodies.

Additionally, the concordat recommends that employers of researchers provide a named point of contact or recognise an appropriate third party to act as confidential liaison for whistleblowers 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.

Employers of researchers are also responsible for taking appropriate steps to remedy any situations arising from an investigation. This can include imposing sanctions, correcting the research record and reporting any action to regulatory and statutory bodies, research participants, funders or other professional bodies as circumstances, contractual obligations and statutory requirements dictate.

Funders of research will:

- have clear expectations of what constitutes research misconduct;
- ensure that recipients of funding are aware of requirements regarding the investigation and reporting of research misconduct, and that these are openly stated.
5. Working together to strengthen the integrity of research and to reviewing progress regularly and openly.

Employers of researchers already take steps to ensure that their environment promotes and nurtures a commitment to research integrity, and that suitable processes are in place to deal with misconduct. It is important that these efforts continue to be suitable and that they are communicated more effectively, and that the same high standards apply to all. The concordat therefore recommends that employers of researchers should present a short annual statement to their own governing body that:

• provides a summary of actions and activities that have been undertaken to support and strengthen understanding and application of research integrity issues (for example postgraduate and researcher training, or process reviews)
• provides assurances that the processes they have in place for dealing with allegations of misconduct are transparent, robust and fair, and that they continue to be appropriate to the needs of the organisation
• provides a high-level statement on any formal investigations of research misconduct that have been undertaken

Furthermore, to improve accountability, and provide assurances that measures being taken continue to support consistently high standards of research integrity, this statement should be made publicly available.

| The Research Ethics Committee (REC) makes an annual report to Academic Board which provides a high level summary of the activities of the Committee and activities relating to research ethics. | The annual reports from REC to AB and from AB to the governors do not explicitly cover research integrity. The requirement of the concordat is that such a statement:
• provides a summary of actions and activities that have been undertaken to support and strengthen understanding and application of research integrity issues (for example postgraduate and researcher training, or process reviews)
• provides assurances that the processes they have in place for dealing with allegations of misconduct are transparent, robust and fair, and that they continue to be appropriate to the needs of the organisation
• provides a high-level statement on any formal investigations of research misconduct that have been undertaken

Furthermore, to improve accountability, and provide assurances that measures being taken continue to support consistently high standards of research integrity, this statement should be made publicly available.

More communication specific to research integrity should be facilitated from the University centre to departments, from department to department and between individuals within departments. | To collate information and prepare a report as per the requirements of the Concordat and to make it publicly available.

To consider how the commitment to research integrity might be further propagated throughout the University at the level of University management, departments and individual staff and students. | REEO and Heads of Academic Departments |