



RESPONSE TO HEFCE'S CONSULTATION ON IMPLEMENTATION OF THE RESEARCH INTEGRITY CONCORDAT

CREST and GuildHE fully support the aims of the research integrity concordat published in 2012, of which we were signatories, and in particular with the effort to support the creation of 'effective systems and processes' ensuring that research is carried out to the highest standards of 'professionalism and rigour'. The UK Research Integrity Working Group and the resulting concordat have helped to raise awareness, and to provided a basis for discussion about existing procedures; for instance, the CREST Research Leads convened a meeting in July 2012, chaired by Dr Andrew Rawnsley (Teeside University), who helped to develop the concordat, to discuss the systems already in place within institutions, and to share best practice with respect to handling issues that might arise in a variety of disciplines and specialisms. We also discussed emerging areas of concern – for instance, the use of social media in research – that may become more contentious in the future.

Question 1:

Taking into account the need to protect the national and international reputation of the UK research base, CREST and GuildHE agree that compliance with the research integrity concordat should be a condition of HEFCE grant. It seems sensible to rely on the existing Financial Memorandum as recommended, emphasising the reporting of 'serious and significant incidents'. However, institutions need clarification that, so long as the institution has demonstrated that it has the proper procedures in place and is acting to uphold these procedures to a high standard, the HEFCE grant is not threatened.

Question 2:

CREST and GuildHE agree that demonstrating compliance with the research integrity concordat should be integrated into the existing annual assurance return. Our concern, as it is likely to be for many institutions, has to do with clarification of the level of reporting that will be required in order to assure compliance. It would be helpful to receive general guidance from HEFCE as to what information about 'internal processes and guidelines' – for instance vis-à-vis governance procedures and research skills training – institutions will be expected to provide in order that Research Ethics Committees can begin to collect any additional evidence of compliance required as soon as possible. The Association for Research Ethics Committees (AREC) has also highlighted the need for the creation of broad external standards as well as a desire to move this forward in 2013, and is encouraging its members to work within a Standard Operating Procedure. A set of general standards agreed between HEFCE, the UK Research Integrity Office and AREC would help institutions to identify any further

steps necessary to ensure compliance with and implementation of the concordat, as at the moment it is unclear as to what role these existing organisations will play in the future research ethics landscape as it is outlined in this consultation.

While standard guidance would help to clarify what HEFCE will require from institutions in order to demonstrate compliance with the concordat, we would argue that any guidance should recognise that, owing to practices within subjects, disciplines and related professional standards, the ways that institutions manage research ethics and integrity issues will naturally differ to an extent. The consultation appears to encourage institutional autonomy with respect to management of research ethics and integrity issues and training; so as long as this continues with the expansion of the annual assurance return, the general proposals presented in the consultation seem sound.