

Research Integrity Concordat Consultation

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445531-445522-45744802	11 Apr 2019, 13:49 (BST)

1	Position	Policy Manager (Research & Innovation)
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2	Organisation	GuildHE
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3	Please indicate whether you are responding on behalf of your organisation.	Yes, and our members
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4	Is the summary of the commitments set out on page five of the draft concordat clear? For ease of reference, the summary is copied out below.	Yes
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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	We would welcome materials such as templates, standard forms, or acceptable models that enable institutions to meet their obligations in a consistent and proportionate manner. There is a great deal of duplication of effort amongst the sector
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or research, are there other materials that would help you or your organisation meet the commitments of the concordat?

as every institution seeks to ensure compliance through generating their own approaches. This is largely wasteful and could be more effectively shared. Some standard forms which do not rely upon institutions holding a separate subscription to a paid-for service would make the process more equitable and efficient.

We would also like to highlight that there is some significant cross-over of roles. Institutions can be both employers of researchers and funders of research, and this is most pertinent to the distribution of Quality-Related funding. Whilst this is acknowledged in the revised concordat, we urge the signatories to carefully consider this dual function and the proportionality of the related expectations, especially where less external funding is available to support research at institutions. This is particularly true of smaller, specialist, and less-research-intensive institutions, but also of discipline areas such as creative arts where external funding comes from a variety of sources.

Finally, we would welcome the promotion of good practice, of success stories (as opposed to extreme examples of bad practice), and case studies which come from the breadth of disciplines and diversity of institutions. This will help ensure the Concordat communicates its relevance to all researchers, regardless of topic, career stage, or subject area.

6	<p>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?</p>	<p>These elements are sound. The language of the Concordat can be sterile and more aligned with experimental science and health disciplines than those involved in social or cultural value and knowledge creation. It therefore may be helpful to consider being more explicit about the interactions more common in such disciplines, such as those between researchers, participants, and beneficiaries, and ensuring that such values apply to those relationships too.</p>
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7	<p>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).</p>	<p>There needs to be some tidying up of the words used - there are still references to 'maintaining' whilst the revised phrase includes 'upholding'. It would be helpful to retain one term, and perhaps make the perceived difference between these explicit.</p>
7.a	<p>For researchers?</p>	<p>Yes</p>
7.b	<p>For employers of researchers?</p>	<p>No</p>

7.b.i	If you answered no, please explain your answer	The loss of the reference to 'collaborating to maintain a research environment' is disappointing. There remains a role for employers as institutional partners to uphold standards and assist each other in that endeavour. The Concordat could benefit from acknowledging that institutions are at different stages of developing and growing their research environments, and that there is great value in encouraging effective sharing of expertise and models of practice.
7.c	For funders of research?	Yes

8.a	For researchers?	Yes
8.b	For employers of research?	Yes
8.c	For funders of research?	No
8.c.i	If you answered no, please explain your answer	The Concordat could be convey more sense of responsibility for funders and their role in the research system. For example, taking research integrity into account in the development of policy seems fairly inactive, compared with a sense of incorporating and upholding the principle of it in their policy making. We would also suggest that UKRI, as a strategic body with oversight for research and innovation, could have a clearer role in promoting understanding of research integrity.

9	Are you confident that your organisation will be able to implement commitment one of the concordat?	Yes
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10	If you have have further comments on this section of the concordat to support research integrity, please use the free text box provided.	We will continue to implement the commitments of the Concordat in so far as we can assist our members as a representative body and research consortium.
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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).	This section is clear.
11.a	For researchers?	Yes
11.b	For employers of research?	Yes
11.c	For funders of research?	Yes

12	Are the revised expectations proportionate? (Use the free text box below if you have additional comments).	The section is proportionate
12.a	For researchers?	Yes
12.b	For employers of research?	Yes
12.c	For funders of research?	Yes

13	Are you confident that your organisation will be able to implement commitment two of the concordat?	Yes
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14	If you have further comments on this section of the concordat to support research integrity, please use the free text box provided.	We will continue to implement the commitments of the Concordat in so far as we can assist our members as a representative body and research consortium.
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<p>15</p>	<p>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).</p>	<p>The original Concordat included reference to the Concordat for the support of the Career Development of Researchers. There is value in cross-referencing such documents and codes of behaviour with each other, as together they provide vital reference points for all aspects of research. We would welcome the signatories reinstating this.</p> <p>We strongly support the new and clarified obligations of research funders, including the named staff for research integrity matters and highlighting the disincentives that may perpetuate unhealthy and negative research cultures.</p> <p>We do also think that researchers themselves have a role to play in nurturing the research culture, and that perhaps the signatories could consider including this group more explicitly in this section. For example, researchers do have a responsibility to promote a culture of research integrity through awareness of biases that may exist in their research methods or interactions with beneficiaries or participants, being aware of the effect their choices may have on others around them, especially where they are working in research teams, and seeking and accepting help and support when it is needed.</p>
<p>15.a</p>	<p>For employers of research?</p>	<p>No</p>

15.a.i	If you answered no, please explain your answer	At present, most is clear except the staff members expected to take responsibility for overseeing research integrity and to act as a first point of contact. Are these intended to be two different people, or can they be the same individual? It would help to have this made explicit.
15.b	For funders of research?	Yes

16.a	For employers of research?	Yes
16.b	For funders of research?	Yes

17	Are you confident that your organisation will be able to implement commitment three of the concordat?	Yes
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18	If you have further comments on this section of the concordat, please use the free text box provided.	We will continue to implement the commitments of the Concordat in so far as we can assist our members as a representative body and research consortium.
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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).	<p>We welcome the clearer, expanded wording of this section of the Concordat and feel it will be very helpful to the sector in considering all types of misconduct.</p> <p>We would urge the signatories to include resources in Annex II to support institutions that do not require further payments or subscriptions, and which do not sit behind a paywall.</p>
19.a	For researchers?	Yes
19.b	For employers of research?	Yes
19.c	For funders of research?	Yes

20.a	For researchers?	Yes
20.b	For employers of research?	No

20.b.i	<p>If you answered no, please explain your answer</p>	<p>We are concerned at the number of named points of contact expected by the Concordat. In the context of smaller and specialist institutions, there is unlikely to be many personnel with the appropriate experience to take up these roles and responsibilities for research integrity. We would not want institutions with fewer named personnel to find themselves under undue scrutiny simply due to their size. Any specific reassurances or guidance the signatories can offer for managing such matters in a diversity of contexts would be welcome.</p>
20.c	<p>For funders of research?</p>	<p>Yes</p>

21	<p>Are you confident that your organisation will be able to implement commitment four of the concordat?</p>	<p>Yes</p>
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22	<p>If you have further comments on this section of the concordat to support research integrity, please use the free text box provided.</p>	<p>We will continue to implement the commitments of the Concordat in so far as we can assist our members as a representative body and research consortium.</p>
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23	<p>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).</p>	<p>These points are clear and we welcome especially the more explicit nature of the expectations upon employers.</p>
23.a	<p>For employers of researchers?</p>	<p>Yes</p>
23.b	<p>For funders of research?</p>	<p>Yes</p>

24.a	<p>For employers of researchers?</p>	<p>No</p>
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24.a.i	<p>If you answered no, please explain your answer</p>	<p>We would welcome a justification or a better description of the process for ensuring ‘transparency’. It seems to us that sending links to statements is potentially over burdensome and ripe for human error. We have already seen that small, and often unrelated, changes at institutional level, such as personnel changes, changes to website design, or internal restructuring can hinder the publication of annual statements. Having a further step may result in accidental non-returns, or links becoming broken, and therefore not being especially useful. There is also no date by which to publish and send such links, nor a sense of the consequence of not doing so. In addition, in contexts where the research environment is of a small size, full annual reporting could be considered disproportionate. Templates or model practices that assist institutions in developing proportionate responses to the requirements of the concordat would help minimise undue burden. This process needs to be better thought through, not least as currently the list of research integrity contacts held by UUK is only of their own members and therefore not all institutions nor businesses conducting research. There is a risk here that employers get caught out by reasons other than the robustness of their actual integrity processes.</p>
24.b	<p>For funders of research?</p>	<p>Yes</p>

25	Are you confident that your organisation will be able to implement commitment four of the concordat?	Yes
26	If you have further comments on this section of the concordat to support research integrity, please use the free text box provided.	We will continue to implement the commitments of the Concordat in so far as we can assist our members as a representative body and research consortium.
28	How long do you think it will take your organisation to implement the commitments set out in the revised concordat?	As a representative body we will engage our members with the revised Concordat and support them in meeting their obligations. To be successful, institutions would need to have time to absorb and apply the revised principles, and where they are small, specialist and particularly where they have emerging research cultures, this time frame may be a little extended due to immediate competing demands on their time, not least the REF. We would however aim for all members to be cognisant of the revised commitments within the next 4-6 months and for them to have completed annual statements for the end of the 19/20 academic year.

29	Would your organisation value a training session on research integrity, focused on the requirements set out in this concordat?	Yes
29.a	Tell us about your training needs in the free text box provided.	Best practice in dealing with misconduct; delivering ethics and integrity training for arts, humanities and creative disciplines; managing integrity in less research intensive contexts.

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
30.a	If you answered no, please explain your answer.	These are generally fine, we just have a couple of suggestions. A reference to the more recent REF guidance for the definition of research may be helpful. We realise this definition has not changed but it may be useful to point readers to the current exercise to avoid confusion. We would also welcome a reference to 'sectoral representative bodies' in the other organisations. GuildHE provides a valuable source of support and guidance for research integrity to our members.

33	If you would like to hear about the outcome of this consultation, please enter your email in the box provided.	rachel.persad@guildhe.ac.uk
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