




TO: BOARD OF GOVERNORS, 29 SEPTEMBER 2021

FROM: PROFESSOR JOHN STRACHAN - PRO-VICE CHANCELLOR (RESEARCH & ENTERPRISE)

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APPROVED BY
VICE-CHANCELLOR: 

SUBJECT: ANNUAL COMPLIANCE STATEMENT ON RESEARCH INTEGRITY AND ETHICS FOR 20/21 ACADEMIC YEAR

1 Purpose and Recommendation

- 1.1 **The Board of Governors is asked to: APPROVE** the Annual Compliance Statement for the Concordat to Support Research Integrity for the 2020/21 academic year (**Appendix A**) for submission to Universities UK (UUK).
- 1.2 The annual report will be published on the University's website, in line with compliance requirements.

2 Summary

- 2.1 The University Research Ethics Committee (REC) and the University Ethics Panel (UEP) have taken a number of actions and activities during the 2020/21 academic year to support and strengthen understanding of research integrity issues, details of which can be found in the draft Annual Compliance Statement attached as Appendix A.
- 2.2 In line with regulatory requirements, Governors are now asked to confirm the University's compliance with the Concordat as set out in Appendix A, and approve the report for submission to the Universities UK for review, and for publication on the University website.
- 2.3 **Appendix A** has been reviewed, revised, and approved by the University Ethics Panel (UEP), and the Research & Ethics Committee (REC) and now asks for approval from the Board of Governors.

3 Background

- 3.1 On 11 July 2012, Universities UK (UUK) published a concordat to support research integrity. This was developed in collaboration with the Higher Education Funding Council for England (HEFCE), Research Councils UK, the Wellcome Trust and Government, and in consultation with higher education institutions (HEIs) and other bodies with an interest in research. The concordat coexists with and supports the mechanisms that some funders of research already have in place to promote best practice.
- 3.2 The requirement for an annual assurance statement was introduced as a condition of the HEFCE grant from 2013/14, for institutions eligible to receive Research England funding for research. Governors have previously approved a report on compliance by Bath Spa University

for 2014/15, 2015/16, 2016/17, 2017/18, 2018/19, and 2019/20. These reports are publicly available on the University's website: <https://www.bathspa.ac.uk/research-and-enterprise/research-strategy/integrity-and-ethics/>

- 3.2.1 The core principles of the Concordat are as follows:
- 3.2.2 All those engaged with research have a duty to consider how the work they undertake, host or support impacts on the research community and on wider society
- 3.2.3 HEIs should maintain the highest standards of research integrity through the following core commitments:
- Upholding the highest standards of rigour and integrity in all aspects of research.
 - Ensuring that research is conducted according to appropriate ethical, legal and professional frameworks, obligations and standards.
 - 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.
 - Committed to using transparent, timely, robust and fair processes to deal with allegations of research misconduct when they arise.
 - Committed to working together to strengthen the integrity of research and to reviewing progress regularly and openly.
- 3.3 UUK has undertaken a review of the Concordat to Support Research Integrity, and sector-wide mechanisms to confirm compliance with the Concordat to Support Research Integrity and the related function of the Research Integrity Committee are still in development. Key recommendations include the following requirements for HEIs in relation to compliance for both UKRI funded research projects, and for the hypothecated use of Higher Education Quality Research (HEQR) grant funding.
- 3.3.1 It is a condition of grant for all higher education providers eligible to receive research funding, administered through Research England to have in place procedures for governing good research practice, and for investigating and reporting unacceptable research conduct, that meets the requirements set out in the Concordat to Support Research Integrity and UKRI Policy and Standards. UKRI will assess compliance with this condition on an ongoing basis.
- 3.3.2 Research England expects higher education providers to notify them promptly of research misconduct which could reasonably be considered to be directly or indirectly supported by our funding. Higher education providers are expected to notify Research England when an allegation is referred for formal investigation, and the outcome of any formal investigations of research misconduct.
- 3.3.3 The University Ethics Panel regularly reviews our policies and procedures relating to Research Integrity and Ethics, to ensure continued compliance with the Concordat, and to align (where appropriate) with sector wise recommendations and guidance in this area, alongside funding body requirements. An Action Plan for compliance with the Concordat has been put in place and progress against actions is monitored by the University Ethics Panel, for reporting to the University Research & Ethics Committee.
- 3.3.4 Bath Spa University has consistently reviewed compliance with the concordat on an annual basis as originally required by HEFCE from the 2014/15 academic year, and these reports are publicly available on the University's website here: <https://www.bathspa.ac.uk/research-and-enterprise/research-strategy/integrity-and-ethics/>
Compliance is now required by Universities UK (UUK), and monitored by a new [UK Committee on Research Integrity](#) (UK CORI), hosted by UKRI.

4 **Discussion**

- 4.1 In addition to approving the formal statement, Governors are asked to note the report, and the ongoing development that has been undertaken across the University to ensure that we comply with the Concordat to Support Research Integrity.
- 4.2 Governors are also asked to note that the Research Ethics Committee (REC) continues to lead the work of embedding research integrity principles across the whole University, within both the undergraduate and postgraduate curricula, and across validation and quality assurance processes. An ongoing review of our ethical policies and procedures is part of this process.

5 **Risk**

- 5.1 As set out above, compliance with the Concordat to Support Research Integrity is a requirement for the receipt of Research England funding for research.
- 5.2 If the University does not include a statement of compliance in its annual assurance statement, it will risk non-payment of the Research England grant in 2022/23.

6 **Conclusion**

- 6.1 It is recommended that The Board of Governors approves the submission of the Annual Compliance Statement to UUK in order to meet regulatory requirements, and for publication of the report on the University's website.

APPENDICES

Appendix A – Annual Compliance Statement for the Concordat to Support Research Integrity 2020/21

Compliance of Bath Spa University with the Concordat to Support Research Integrity – September 2021 report to Governors

Introduction

The [UUK Concordat to Support Research Integrity](#) requires that institutions make an annual statement to their governing body on the actions they have undertaken to sustain and further enhance integrity in their research. The revised Concordat was published in October 2019, providing the principles, commitments and standards which should be inherent in all good research. The revised Concordat represents a renewed ambition to strengthen research integrity, building on a shared commitment that research produced, or in collaboration with the UK research community, is underpinned by the highest standards of rigour, integrity and excellence.

The 2020/21 report for Bath Spa University has been collated by the Research Support Office (RSO) in consultation with Schools, and approved by the University Ethics Panel (UEP) and Research Ethics Committee (REC).

1. Maintaining the highest standards of research integrity at Bath Spa University

1.1 The University's commitment and approach to the highest standards of research ethics and integrity is subject to ongoing evaluation and review through discussions at the University Ethics Panel (UEP), and reported through the Research Ethics Committee (REC) for oversight and approval of proposed developments.

1.2 Throughout the 2020/21 academic year, we have continued to expand and develop our suite of online resources (launched during 2019/20) to support researchers to understand all aspects of Research Integrity, as well as to ensure that our resources, processes and lines of accountability continue to be transparent and encourage open dialogue and communication – including updated templates, exemplars, guidance, and information to support our research community. This resource serves as a 'one stop shop' to detail clear policies, procedures, and contact points for ethical review and approval, as well as to communicate clear requirements and expectations in line with the commitments within the Concordat to all researchers.

1.3 The University continues to operate an Ethics Peer Review College (EPRC) within each academic unit, led by a designated School Ethics Lead who serves as School representative to the UEP and manages a team of reviewers within each academic unit. A focus during 2020/21 has been in embedding the role of School Ethics Lead as a local point of contact in each School, creating an access point for researchers for informal and formal engagement in Research Integrity matters, and ensuring that our research community are able to access appropriate advice and guidance on ethical issues and standards. The School Ethics Lead is then in turn able to ensure that key emerging themes from such discussions can be escalated to the UEP for consideration and action within our wider institutional development planning.

1.4 In order to continue to embed awareness of legal, ethical and professional frameworks, as well as data management issues in relation to research ethics and integrity, during 2020/21 the Research Support Office has worked closely with the Head of Compliance to ensure that policies and procedures are fit for purpose, and the Head of Compliance was added as a member of the University Ethics Panel during 2020/2021 to support ongoing development of this area of work and to encourage alignment across all aspects of research integrity.

2. Embedding a culture of research integrity at Bath Spa University

- a. The University is committed to embedding an open culture of research integrity, and during 2020/21 the UEP has led work to maintain and further develop a culture of transparency, open communication, and ongoing dialogue relating to research integrity and ethics matters. The appointment of School Ethics Leads in each academic unit, and their engagement in the work of UEP in the last academic year has been

transformative in moving this agenda forward. We can already see a real change in practice across the University with ethical considerations being applied organically across our undergraduate and postgraduate programmes as well as PhD and staff research projects. We will continue to build on this in the 2021/22 academic year.

- b. In 2020/21, a new online replacement for the Liquid Office process was put in place to streamline the initial screening process for research proposals, improve accessibility, and to enhance early identification of ethical issues to support upfront discussions around ethical approval needs. This enables staff and students to work through an online checklist to determine whether or not their research proposal requires full ethical review through School and University procedures. This revised online checklist process has been disseminated widely, and is being used consistently by both academic staff and PhD students at the start of the research process.
- c. During 2020/21, alongside our existing suite of training, we have introduced further in-person training opportunities through the Researcher Development Programme, as well as new face-to-face quick inductions to our Research Integrity and Ethics processes and resources as part of our 'Introduction to the Research Office' new starter induction workshop for all new members of staff. We have also designed and implemented a new 'Brief Introduction to Research Integrity and Ethics' session for new PhD registrants as part of their induction programme, better signposting further training, resources, and expectations around ethical review and approval. We have also invested in external guest speakers to deliver wider training related to relevant research integrity and ethical matters, including sessions delivered by Sado Jirde, Director of the Black South West Network on the theme of 'Delivering Inclusion in Research'.
- d. The UEP has reviewed and updated handbook guidance to new PhD students to better signpost ethical processes, but also to better stimulate upfront and informal discussions around matters of research integrity and ethics with both their Supervisory teams and with wider contact points within the University, including School Ethics Leads and the RSO – developing our institutional culture to further enable upfront and open discussions prior to research commencing, but to also encourage further ongoing and open dialog of such matters during project delivery and beyond.
- e. The Research Support office has worked to develop toolkits and resources on the University intranet for different student groups and staff, supported by on-line resources which offer an introduction to research integrity available to the whole student community. This includes a fast-track ethical approval template for Undergraduate and Postgraduate Taught students, which was being trialled during the 2020/21 academic year, as well as collated resources on the University intranet. The UEP has continued to monitor usage of this new fast-track process, and made revisions in light of feedback from students and staff during the 2020/21 academic year to better reflect their needs and to maximise impact.
- f. The University upgraded to the second edition of the suite of Epigeum's online Research Integrity Modules during 2020/21, which have been updated to better integrate the principles detailed in the revised Concordat to Support Research Integrity. The new, more user-friendly and accessible modules were launched during 2020/21, and provide comprehensive research integrity training that delivers robust and consistent training in responsible research conduct. In addition, the Modules determine best practice informing users of the key concepts of research integrity, for each discipline, identifying all steps of the research process from design to reporting, addressing the types of issues important to researchers going through the different stages of the research project. The revised training was launched for all new starters during 2020/21, and the UEP is developing a refresher programme for all academic staff and students who have undertaken the previous version of this training during the 2021/22 academic year.

g. A revised monitoring system has been put in place for the review of ethical approvals, discontinuing the previous Liquid Office-based process and centralised through the RSO, and summary data for 2020/21 is set out below:

h. Stage 1 initial review process (Stage 1)

- 18 applications have been recorded as receiving ethical clearance with no need for further review, of which 1 was a PhD Student (first phase of project), and 17 were from Staff.
- 28 staff and 10 PhD student applications have been recorded as needing full ethical approval at School level

These figures include mandatory ethical screening for all research grant applications at the bid submission stage, to identify which projects should go forward for full ethical approval if the grant is awarded.

2.9 School level ethical review process (Stage 2)

- Bath School of Art
 - No staff applications were considered
 - No PhD applications were considered
- Bath School of Design
 - No staff applications were considered
 - No PhD applications were considered
- School of Sciences
 - 13 staff applications have been considered of which 7 have been approved, 5 are in process, 1 is on hold pending funding award.
 - No PhD applications were received for consideration
- School of Education
 - 12 staff applications were considered, of which 8 were subsequently approved, 3 are on hold pending funding award, and 1 was subsequently no longer required.
 - 2 PhD applications were considered, of which 2 were subsequently approved
- School of Humanities
 - No staff applications were considered
 - 3 PhD applications are still under review
- Bath Business School
 - 1 staff applications was considered, which remains under review
 - 1 PhD student application was considered and approved.
- School of Creative Industries
 - 1 staff application was considered and remains on hold pending funding award
 - 1 PhD student applications was considered, and is still under review
- Bath School of Music and Performing Arts
 - 1 staff application was considered, and subsequently approved
 - 3 PhD student applications were considered, 2 were subsequently approved, and 1 is still under review

2.10 University level ethical review process

- 2 PhD applications have been considered, 1 was approved, 1 is awaiting resubmission
- UEP has also considered policy and procedures relating to Retrospective Ethical Approval, Working with Animals and Invertebrates, and guidance for Creative Practice-based research.
- The UEP has also considered revised Handbook guidance for both PhD students and Supervisors.

2.11 In line with Audit Committee recommendations, the University Ethics Panel continues to review compliance against the UUK Concordat, and an action plan has been put in place using the 2019/20 UKRIO and ARMA Audit Tool to address areas of further development, which is monitored on a regular basis as a standing agenda item of UEP.

3. Dealing with allegations of research misconduct

3.1 Processes for the reporting and investigating of allegations of research misconduct have been reviewed in line with the UK Research Integrity office (UKRIO) recommendations, and UKRI guidance. The University is committed to ensuring that it has appropriate principles and mechanisms to ensure that investigations are thorough and fair, carried out in a transparent and timely manner, and protected by appropriate confidentiality.

3.2 No allegations of research misconduct were received during the 2020/21 academic year

3.3 Processes for the reporting and investigation of allegations of research misconduct will be subject to further review and development during the 2021/22 academic year to ensure continued compliance with the revised Concordat and in order to continue to build upon the rigour of our processes and procedures.

4. Our commitment to strengthening research integrity

4.1 The University is a member of the UK Research Integrity Office (UKRIO) and RSO staff and members of university ethics panels are supported to attend their workshops and events, which are disseminated via the RSO through staff communication channels

4.1.1 Dr Alastair Niven is an active external member of the University Ethics Panel (UEP), and Professor Jeremy Bradshaw serves as External Adviser to the Research Ethics Committee (REC) – both continuing to offer invaluable help and support, as well as external scrutiny to both panels. The UEP also regularly invites guest stakeholders to panel meetings as required to support the topic of discussion, including the BSU Impact Research Fellow, and subject specialists within individual academic units to support discussions and developments across in particular disciplinary areas.

4.1.2 As part of the approved action plan against the UKRIO and ARMA audit tool, the University Ethics Panel is considering further ways in which to formalise the role of external stakeholder groups and representative bodies within the ethical review process.

4.1.3 During 2020/21, we engaged with the Black South West Network to deliver additional training workshops on 'Delivering Inclusion in Research' to our research community, as well as enhanced relations with the University's Disabled Staff Network through RSO representation to embed key groups into our programme of training and development. During 2021/22, we hope to continue to build upon these relationships and to continue to broaden the range of external and internal inputs that feed into development of research integrity and ethics policies.

4.1.4 The RSO regularly reviews policy relating to researchers and projects supported by particular funding bodies and disseminates this as appropriate across the academic community.

4.1.5 RSO and academic staff are supported to attend funder specific workshops and training in this area, and the intranet is continually being updated to make funder regulations, guidance, and example of good practice more widely available.

4.1.6 REC regularly reviews policy and procedures relating to Open Research, and has an action plan to comply with the requirements of the Concordat on Open Research Data, to which the University has recently become a signatory.