



TO: BOARD OF GOVERNORS, 27 SEPTEMBER 2023

SUBJECT: ANNUAL COMPLIANCE STATEMENT ON RESEARCH INTEGRITY
2022/23

FROM: PROFESSOR JOHN STRACHAN, PRO VICE CHANCELLOR, RESEARCH
AND ENTERPRISE

PREPARED BY: JOE FORT, RESEARCH PROJECTS AND GOVERNANCE MANAGER

DATE: 06 SEPTEMBER 2023

CLASSIFICATION: PUBLIC

APPROVED BY THE

VICE-CHANCELLOR:

A handwritten signature in black ink, appearing to be "Joe Fort", written over the "APPROVED BY THE" text.

1 **RECOMMENDATIONS**

The Committee is asked to: APPROVE the draft Annual Compliance Statement for the 2022/23 academic year at Appendix A

2 **EXECUTIVE SUMMARY**

In line with regulatory requirements as a signatory against the [Universities UK Concordat to Support Research Integrity](#), it is a requirement that the University publishes an Annual Compliance Statement on its public-facing website outlining its actions to comply with the Concordat during the last academic year. Publication of this statement annually is a statutory requirement for continued annual HEQR funding from Research England. The draft Annual Compliance Statement for the 2022/23 academic year outlining our actions and compliance against the Concordat is set out as Appendix A.

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. Bath Spa University is a signatory of this Concordat, in line with Research England compliance.

- 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. This means that publication of the Annual Compliance Statement is a requirement in order for us to continue receiving the annual Research England HEQR funding allocation. Governors have previously approved reports on compliance by Bath Spa University annually since the 2014/15 academic year. These reports are made publicly available on the University's website to meet this compliance criteria: <https://www.bathspa.ac.uk/research-and-enterprise/research-strategy/integrity-and-ethics/>
- 3.3 The core principles of the Concordat are as follows:
- 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.
 - 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
- 3.4 The draft Annual Compliance Statement for 2022/23 (Appendix A) has been collated and drafted by the Research Support Office (RSO), in conjunction with the University Ethics Panel to highlight the activities the University has undertaken in line with the Concordat during the 2022/23 academic year.

4 DISCUSSION

- 4.1 The Research and Ethics Committee (REC) and the University Ethics Panel (UEP) have taken a number of actions and activities during the 2022/23 academic year to support and strengthen our institutional understanding of research integrity matters, as well as contribute towards our wider institutional culture of research integrity. Details of the actions undertaken during the 2022/23 academic year can be found in the draft Annual Compliance Statement attached as Appendix A.
- 4.2 The draft outlines the strategic operational themes of the UEP, and how these themes have fed into clear actions and initiatives related to each main commitment under the Concordat, as well as our own institutional priorities, therefore demonstrating both our commitment to and actions against the requirements of the Concordat and our own institutional needs.
- 4.3 Board is 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 going review of our ethical policies and procedures is part of this process.
- 4.4 Board is asked to note that mandatory training compliance for academic staff remained high during the 2022/23 academic year, and that the University Ethics Panel is launching a new refresher training push for all academic staff during the 2023/24 academic year to ensure that all staff who may have taken part in training more than 2 years ago have received top-up training during the academic year.

5 RISK

- As set out above, compliance with the Concordat to Support Research Integrity is a requirement for the receipt of Research England funding for research (HEQR)
- 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 future years

6 **CONCLUSION**

It is recommended that the Board of Governors **APPROVES** the draft Annual Compliance Statement as per Appendix A for publication on the University website prior to 31st October 2023 to ensure compliance against the requirements of the Concordat for the 2022/23 academic year.

7 **APPENDICES**

Appendix A: Compliance of Bath Spa University with the Concordat to Support Research Integrity – September 2023 report to Governors

APPENDIX A

Compliance of Bath Spa University with the Concordat to Support Research Integrity – September 2023 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 2022/23 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 noted by Research Ethics Committee (REC), and aims to provide an overview of our actions during the 2022/23 academic year to further demonstrate our commitment towards to Concordat.

Strategic Overview

Throughout the 2022/23 academic year, we have continued to expand upon and develop our action plan against the Concordat – as demonstrated through the development and delivery of three key thematic areas of work within which the UEP to align the planning, development, and delivery of its activities with both our institutional commitments and our commitments under the Concordat. These three themes of work are:

- Training & Development,
- Resources, Guidance and Policy
- Embedding ethical research practice into the curriculum and all of the academic activities we deliver.

Theme	Responsibility	Alignment with BSU priority areas:
Embedding ethical research practice into the curriculum and all of the academic activities we deliver	Identifying research practice across the curriculum, and working with academics and central teams such as Academic Quality to map and enhance visibility, effectiveness and rigour of ethical inputs across Definitive Programme Documentation (DPDs), as well as embedding such practice where appropriate into the curriculum and better showcasing the benefits and visibility of the skills gained by going through these processes and the intellectual discussions to students and staff teams	<ul style="list-style-type: none"> ● Curriculum redesign ● Student Experience ● Teaching & Learning
Training & Development	To create and co-design opportunities to nurture our institutional culture of ethical practice across all academic staff teams, ensuring that all academic staff feel empowered to a.) make and discuss ethical considerations and judgments within their contexts in an open way, and b.) to help students and colleagues consider and shape their own ethical practice in a non-judgmental environment. This is through training opportunities, as well as through structured opportunities for staff to engage with research integrity and ethical matters - e.g. through collaboration, engagement with ethical review, approaches to ethical discussion. This will in turn support development of our reviewer pool.	<ul style="list-style-type: none"> ● Staff Satisfaction ● Student Experience ● Teaching & Learning ● Curriculum redesign

Resources, Guidance and Policy	To consider subject/context-based challenges within our wider research culture, and to lead and help facilitate subject-specific resources, guidance, frameworks, processes and policies (institutional and local) that support both School-based academic staff and students in conducting their research in an ethical manner within their subject areas. This includes development of ethical approval paperwork and supporting materials, and subject-specific guidance frameworks.	<ul style="list-style-type: none"> ● Student Experience ● Staff Satisfaction ● Teaching & learning ● Curriculum redesign
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During the 2022/23 academic year, these thematic areas have steered the trajectory of the UEP agenda and enabled us to align directly with our commitments under the Concordat as well as more broadly to continue to enhance and develop our Research Integrity Culture.

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. 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 noted in previous statements has been on 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.
- 1.3. A key focus in further expanding this work during the 2022/23 academic year has been on enabling platforms as opportunities for staff and students to better engage with their School Ethics teams – both formally and informally. This has been enabled through newly-introduced ethics drop-in sessions, as well as UEP member attendance at existing core teaching staff meetings within individual schools. This has been successful in allowing RI matters to be incorporated into curriculum design organically from the ground up as our student offer develops, as well as providing “nuts and bolts” discussions on process and operational matters to best enable ethical review and ethical discussions amongst our student and staff community. This in turn has opened up new channels of discussion around ethical matters and contributed towards our wider RI culture – ensuring that standards are upheld evenly, staff and students know who they can discuss any challenges or concerns with, and overall ensuring that RI matters are embedded within new developments upfront and any complexities have opportunity to be discussed and addressed openly at inception.
- 1.4. Continuing on from our initial work during 2021/22, the Research Projects and Governance Manager has engaged directly with a number of new PhD registrants, both through informal introduction sessions and one-to-one to ensure that new research students are aware of ethical procedures and matters for consideration within their individual research proposals and have opportunities to talk these through informally at project inception.
- 1.5. Resources to support PhD students – including appropriate ethics and data statements – have been developed and deployed this year to better enable thorough consideration of ethical matters at project inception, and how these influence what they will want to submit at Viva, as well as in terms of future dissemination.
- 1.6. We are in the process of exploring and procuring an online ethics management system, to better enable administration of ethical approval at both student and staff levels. Operationally, this will help us to better understand our research practice at

BSU, but also enable time-savings and more targeted support by identifying any areas of challenge across the institution.

- 1.7. Following the University upgrading to the second edition of the suite of Epigeum's online Research Integrity modules, The UEP has used such engagement with our community to drill-down into the core modules available to staff and to sign-post specific modules as part of our training refresher programme of work. This has in turn shortened the time-commitment to staff upskilling their existing knowledge, and contributed towards continued strong engagement with this mandatory training amongst our academic staff community.
- 1.8. Overall update on mandatory online Epigeum Research Integrity training amongst academic staff has remained an area of strength for BSU – with an average overall compliance of 90% (nb. This figure includes staff still within their six month probationary period, who may not yet have completed the training)
- 1.9. A break down on overall completions by academic unit is below:

Academic School	% of academic completions
School of Education	93%
Bath School of Design	81%
Bath Business School	82%
Bath School of Art, Film and Media	94%
School of Writing, Publishing and Humanities	88%
School of Sciences	93%
Bath School of Music and Performing Arts	90%
BSU Total	90%

- 1.10. Whilst overall compliance with mandatory training is strong, the UEP is continually working to better promote and target both new starters and existing staff encouraging them to upskill by ensuring they are up-to-date with their mandatory training.
- 1.11. To this end, it is intended that during the 2023/24 academic year the UEP will be coordinating a refresher training programme to ensure that all academic staff remaining up-to-date in their understanding of key RI matters by retaking elements of the online training programme.
- 1.12. Whilst these mandatory training compliance markers demonstrate our commitment to maintaining the highest standards of research integrity at Bath Spa University, our key focus during 2022/23 has been on enabling opportunity for our staff and students to engage with the UEP in embedding and further enhancing our culture of research integrity at Bath Spa, as demonstrated in Section 2 below.

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

- 2.1. The University is committed to embedding an open culture of research integrity, and aligned this with our strategic theme of “Embedding ethical research practice into the curriculum and all of the academic activities we deliver”.
- 2.2. During the 2022/23 academic year, our core priority has been developing actions that develop a culture of transparency, open communication, and ongoing dialogue relating to research integrity and ethics matters and overall awareness raising.
- 2.3. Following review of materials and guidance last academic year, the first strategic action of the UEP during 2022/23 has been to better enable opportunities for our community to engage with matters of research integrity. To this end, an allocation of our Higher Education Quality Research (HEQR) Culture & People funding has been provided to each School Ethics Lead to develop and deliver initiatives that will enhance the knowledge and awareness of ethical matters in their areas, as well as to provide platforms for dialogue on such matters that allow staff and students to engage with matters of RI more broadly as part of their studies and as part of our staff development across the three new academic career pathways.
- 2.4. Summaries of the projects approved by REC for the use of this funding included:

- ❖ School-led training initiatives to upskill casual members of academic staff by

- enabling time and space for them to partake in additional ethics training workshops within their subject areas.
- ❖ Developing targeted research into sector-wide RI good practice and policy particularly relating to creative practice and the arts, with the view to using this research to enable development of enhanced and consistent resources and guidance across different course teams and students in this field and better signposting of external resources.
 - ❖ Research Assistant support to enable School Ethics leads to map and understand where RI matters sit within the wider curriculum within their schools, enabling targeted discussion, support with colleagues across teams, and the development of new consistent training resources and guidance for students.
- 2.5. Following REC approval, these projects commenced during the 22/23 academic year and will continue into the 23/24 academic year to allow them to continue to maximise engagement and develop organically over the next several months.
- 2.6. In addition to our already successful suite of training, both in-person and online, this investment has enabled a very focused and new complementary suite of engagement opportunities that is bespoke to the direct needs of identified by School Ethics Leads within their individual areas – meaning that we now offer both high-level institutional training and workshop activities to support knowledge and understanding of RI matters at Bath Spa, but also subject and discipline-led opportunities led at a local School-level that are already positively impacting our culture of RI as well as our staff and students' understanding of these matters. These initiatives are designed as platforms for engagement – fostering a sense of joint-working amongst our BSU community, but also clear platforms for dialogue and engagement within our wider RI culture. We also intend to use the UEP as a platform for cross-school pollination of best practices from these initiatives, enabling wider institutional dissemination.
- 2.7. As part of our work to implement a new online ethics system at BSU, the Research Projects & Governance Manager within the RSO has begun a piece of engagement work with staff and student representatives across the institution to enable a dialogue with them over current best practice and any areas of frustration amongst our community in relation to ethical practice. The research aim of this piece of work is not only to gather intelligence, but also to enable engagement with individuals and teams that are representative of our research community and to gain insights into their challenges that will inform UEP thinking.
- 2.8. We believe that the level of direct engagement - both formal and informal - that our UEP has with the staff and student community is a clear area of strength for BSU, with platforms for such dialogue built organically into our processes and direct opportunities for all members of our community to feel part of and support shaping of developments in RI culture and development initiatives.
- 2.9. Part of our strategic approach has been to target new starters – both at Staff and PhD levels – early, to both introduce them to our ethical processes, but to enable dialogue from the outset with these groups in regards to ethical matters, as well as to provide the soft skills required to successfully engage in ethical dialogues with peers. 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.
- 2.10. 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. This initial engagement with new staff and students has proven fruitful, with many students more confidently approaching members of the wider RI team around them to open upfront informal discussions around ethical matters in their work and to have the confidence to reflect upon and implement good quality

practice both in terms of their upfront ethical approval but more broadly throughout delivery of their research.

- 2.11. In collaboration with our research librarians, the RSO has also worked closely with the Graduate College to provide an updated and refreshed suite of guidance within the PhD Handbook, providing more contextual advice in regards to ethics, encouragement of students to prompt ethical discussion with their supervisory teams, as well as “boilerplate” templates and guidance on ethics, data, and copyright statements that we hope by being provided and highlighted at the start of their PhD journeys will enable them to better consider how ethics is intertwined in their research design, as well as nurture reflection throughout their research journeys. We hope to develop and deliver further training and support for our students on how to enable effective discussions relating upon ethical matters, drawing upon research from Erasmus University.
- 2.12. Recently, the University has invested in further staff resource to support the training and development of our researchers through the appointment of a newly retooled Senior Lecturer in Researcher Development role. This role demonstrates clear investment in the training and development needs of our academic community, but also a clear demonstration of our commitment to continually strive to enhance our wider research integrity culture at BSU. This role will be integral to working with the UEP more broadly to continue to expand and diversify our training and engagement offer around RI.
- 2.13. The UEP has continued to focus during the 2022/23 academic year on embedding and aligning ethical approval processes with wider issues around Data Management – reinforcing the processes for Data Management Planning to ensure the process is run in parallel with ethical approval to ensure a seamless parallel process is followed in order for both technical and ethical matters to be considered hand-in-hand. This has enhanced our institutional culture of deep thinking around such matters, and an improved understanding of the linkages between these different aspects of research integrity.

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. The University has been made aware of one allegation of research misconduct during the 2022/23 academic year, which was not upheld following initial inquiry.
- 3.3. The UEP fed into the consultation on the UKRIO draft procedure for dealing with allegations of research misconduct, and processes for the reporting and investigation of allegations of research misconduct, and during the 2022/23 academic year has reviewed and considered the revised guidance published – in particular the model procedure for investigation of research misconduct – to ensure that our processes for dealing with allegations of research misconduct remain aligned with our commitments under the Concordat. We will be continuing to consider this, in particular through development and delivery of further supplementary guidance, during 2023/24.

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. Useful materials gained from these workshops are shared institutionally via our intranet resources to widen access.
- 4.2. During the 2022/23 academic year, our commitment to developing and continually evolving our Ethics Peer Review College was recognised as a best practice case study on the [Knowledge Exchange Concordat website](#) - this case study recognises the

unique strength of our capacity to continually evolve and develop our commitment to strengthening research integrity in line with our wider institutional developments and strategic needs, as well as working to promote quality research integrity practice outside of academic walls.

Our commitment is also demonstrated through the strong additional level of financial investment committed by the University during the 2022/23 academic year through the allocation of HEQR People and Culture funding to the UEP, the additional resource allocated to support investment in a new online ethics platform for our community, as well as the appointment of a new Senior Lecturer in Researcher Development to support the broader expansion of training and development related to matters of RI within the University.

- 4.3. We believe that external scrutiny and rigour is key towards quality-assuring and driving our ambition to continually strengthen research integrity at Bath Spa. 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 robust external scrutiny to both panels.
- 4.4. The work of the UEP is overseen by REC, which in turn reports to our Academic Board - ensuring that internal scrutiny is applied across all levels of our work across these committees. We are currently reviewing our policy and practice in relation to public engagement events to develop further guidance in this area across the next academic year, and in line with the new Academic Career Pathways, demonstrating our commitment and ability to continually review and adapt our work in line with new and emerging areas and strive for excellence in our practice.
- 4.5. The UEP also regularly invites guest stakeholders to panel meetings as required to support the topic of discussion, including the BSU Impact Research Fellow, Senior Lecturer in Researcher Development, the Knowledge Exchange Manager, and subject specialists within individual academic units to support discussions and developments across particular disciplinary areas.
- 4.6. We also engage with a variety of internal networks at Bath Spa - such as the Workload Planning Steering Group, the Disabled Staff Network, the Equality and Diversity Steering Group, the University Secretary's Office, the External Affairs Unit, and various other internal committees and departments to inform and develop our expertise and to inform our work.
- 4.7. During 2022/23, we have also engaged with external groups to ensure that our outward-facing profile and engagement is strengthened, as well as increasing the positive real-world impact of our work - with Bath Spa recently becoming the University partner for the Black South West Network (BSWN) and working closely with them to drive ethical research practice as part of their new UKRI-funded community research network. We are also leading the Wellcome Trust-funded "We Are The People" research team of disabled academics and non-disabled allies engaged in disability research and disability activism, which will be engaging directly with externally-facing partners and newly appointed Community Research Fellows to engage them in quality research practice and in-turn supporting future development of our RI policy and guidance in terms of accessibility and equity.
- 4.8. The RSO regularly reviews policy relating to researchers and projects supported by particular funding bodies and disseminates this as appropriate across the academic community.
- 4.9. 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.
- 4.10. 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 is a signatory.