



TO: **BOARD OF GOVERNORS, 10th JULY 2019**

FROM: PRO VICE-CHANCELLOR (RESEARCH & ENTERPRISE)

PREPARED BY: PRO VICE-CHANCELLOR (RESEARCH & ENTERPRISE)

DATE: 21st JUNE 2019

APPROVED BY
DEPUTY VICE-
CHANCELLOR:

A handwritten signature in blue ink, appearing to read 'N.C. Summell'.

SUBJECT: **COMPLIANCE WITH CONCORDAT TO SUPPORT RESEARCH
INTEGRITY – ANNUAL ASSURANCE STATEMENT TO
RESEARCH ENGLAND**

1. PURPOSE AND RECOMMENDATIONS

- 1.1 The requirement for an annual assurance statement was introduced as a condition of HEFCE grant from 2013-14, for institutions eligible to receive Research England funding for research. This follows the consultation 'Research Integrity Concordat: Consultation on proposed implementation from 2013-14' (HEFCE 2012/32), the outcomes of which are published on the research integrity section of the UKRI web-site: <https://www.ukri.org/about-us/policies-and-standards/research-integrity/>
- 1.2 HEFCE required institutions eligible to receive its research funding to comply with the Concordat to Support Research Integrity as a condition of grant and has produced information and guidance for institutions around compliance and advice on finding additional information.
- 1.3 Governors have previously approved a reports on compliance by Bath Spa University for 2014/15, 2015/16, 2016/17 and 2017/18. These reports are publicly available on the university's website: <https://www.bathspa.ac.uk/research-and-enterprise/research-strategy/integrity-and-ethics/>
- 1.4 Research England, and in the future UUK, continue to require HEIs to submit an annual compliance statement and for these to be made publicly available.
- 1.5 **Recommendation:** that Board of Governors consider the 2018/19 annual compliance report attached for approval and inclusion in the University's Research England annual assurance statement and publication on the University website.

2. SUMMARY

- 2.1 The University Research, Knowledge Exchange and Consultancy Committee (RKECC) has taken a number of actions and activities in the 2018/19 academic year to support and strengthen understanding and application of research integrity issues, details of which can be found in the annual compliance statement attached as Appendix A.
- 2.2 In line with statutory requirements, the University is now asked to confirm its compliance with the Concordat as set out in Appendix A: The Annual Compliance Statement to Research England.

3. BACKGROUND

- 3.1 On 11 July 2012, Universities UK (UUK) published a concordat to support research integrity. This was developed in collaboration with HEFCE, Research Councils UK, the Wellcome Trust and Government, and in consultation with 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.
 - 3.2.1 The core principles of the Concordat are as follows:
 - 3.2.1 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
 - 3.2.2 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.
 - 3.2 The UUK is currently undertaking a review of the Concordat to Support Research Integrity. The [UUK briefing](#) on the consultation process is as follows:
 - 3.2.1 A report into research integrity published by the Commons Science and Technology Committee recognised the value of the concordat to support research integrity but concluded that the concordat to support research integrity should be tightened so that compliance can be more easily assessed, with a timetabled route-map to securing 100% compliance.
 - 3.2.2 Since the publication of the report in July 2018, the signatories of the concordat have met to consider how to clarify the existing principles and commitments of the concordat.
 - 3.2.3 A key weakness of the existing concordat is the sector's inability to demonstrate that it has met the requirements of the concordat. The revised concordat makes expectations clearer and requires institutions to submit information to the secretariat. Going forward, implementation of the commitments will be monitored. The commitments of the concordat are intended to be proportionate, addressing legitimate concerns about transparency while recognising that universities are operating in an increasingly challenging environment. The commitments are suitable to a range of institutions of different sizes and level of resource.

- 3.3 The University Ethics Committee 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.
- 3.4 Bath Spa University has consistently reviewed compliance with the concordat on an annual basis as 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/>

4. DISCUSSION

- 4.1 Governors are asked to consider the report attached to enable the Chief Operating Officer to include a statement of compliance in the Research England annual assurance statement.
- 4.2 Governors are asked to note that the Research, Knowledge Exchange and Consultancy Committee (RKECC) 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 in section 1.1 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 the payment of Research England grant in 2018/19.

6. CONCLUSION

- 6.1 That Board of Governors consider the compliance report attached for approval and inclusion in the Research England annual assurance statement and publication on the University website.



Appendix A

Compliance of Bath Spa University with the Concordat to Support Research Integrity – June 2019 report to Governors

Introduction

The UUK Concordat to Support Research Integrity recommends 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 2018/19 report for Bath Spa University has been collated by the Research Support Office in consultation with Schools, and approved by the University Ethics Committee.

1. *Bath Spa University strategy and objectives to strengthen understanding of research integrity.*

- 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 an Ethics Working Group, and as a result in changing legislation and institutional policy, as discussed and agreed at the University Ethics Committee.
- 1.2 As a result of an internal review, ethics policies and procedures were comprehensively reviewed in the 2018/19 academic year, and a new suite of materials put in place to enable greater understanding of the process of ethical review at both School and University level.
- 1.3 In order to meet the new General Data Protection Regulation requirements (GDPR), the Research Support office has worked closely with the University Compliance Officer to ensure that the new policies and procedures are fit for purpose.
- 1.4 In 2017/18 an on-line Liquid Office process was put in place to streamline an initial screening process for research proposals. This enables staff and students to work through a checklist to determine whether or not their research proposal requires full ethical review through School and University procedures. This Liquid Office checklist process has been disseminated widely, and is now being consistently used by both academic staff and PhD students at the start of the research process. Workshops continue to be delivered to our researcher community through the Research Staff Development programme, including bespoke workshops for different disciplines in consultation with the Schools.
- 1.5 The Research Support office is working with colleagues in academic services to develop a toolkit and resources on Minerva for Undergraduate and Postgraduate Taught students, supported by on-line resources which offer an introduction to research integrity available to the whole student community.

1.6 A suite of on-line Research Ethics and Integrity materials was put in place at the start of the academic year - through the provider Epigeum - and the Concise introduction to Research Integrity course is mandatory for all academic staff, and included on the induction checklist for new starters. The terms of the licence also allows the course to be accessed by all undergraduate and postgraduate students

1.6.1 A breakdown of completion of the introductory compulsory ethics training across academic staff within the Schools is set out below:

- Bath School of Art and Design – 80% of academic staff to date
- Institute for Education – 48% of academic staff to date
- College of Liberal Arts – 43% of academic staff to date

UEC has an action plan to address compliance across the new School structure and to ensure that all academic staff complete the mandatory training over the 2018/19 academic year. This includes structured workshops for Arts & Humanities staff, as well as a training and development programme for members of a new Ethics Peer Review College which will support ethical approval processes across the University moving forward.

1.6.2 In addition to the above, the Introduction to Research Integrity module has been completed by the following:

- 19 Professional services staff
- 9 PhD students
- 13 Undergraduate students

1.6.3 The more detailed training available through discipline specific modules which is optional for staff and students has been completed by the following:

- 66 professional services staff
- 85 academic members of staff
- 24 PhD students
- 20 postgraduate students
- 65 Undergraduate students

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1.7 A new monitoring system has been put in place for the review of ethical approvals, and summary data is set out below:

1.7.1 Liquid office initial review process (Stage 1)

- 39 staff and 4 PhD student applications have been recorded as receiving ethical clearance with no need for further review
- 63 staff and 7 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 bid submission stage, to identify which projects should go forward for full ethical approval if the grant is awarded.

1.7.2 School level ethical review process (Stage 2)

- Bath School of Art & Design
 - 2 staff applications were considered, both were approved
 - 3 PhD applications were considered, 2 have been approved and 1 is still under review

- College of Liberal Arts
 - 12 staff applications have been considered of which 6 have been approved, 4 are in process, 1 has been withdrawn and 1 was rejected
 - No PhD applications were received for consideration
- Institute for Education
 - 7 staff applications were considered, of which 6 were subsequently approved and 1 is still under review
 - 2 PhD applications were considered of which 1 was subsequently approved and 1 is still under review

1.7.3 University level ethical review process

- 1 staff application has been considered which was rejected by the Committee. An additional application is currently under review.
- UEC has also considered policy and procedures relating to student placements and research co-created between staff and students.

1.8 In line with Audit Committee recommendations, the University Ethics Committee continues to review compliance against the UUK Concordat, and an action plan is in place to address areas of further development, which is monitored on a regular basis.

2. **Addressing research misconduct**

2.1 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.

2.2 Allegations received in the 2018/19 academic include the following:

2.2.1 Two allegations of academic staff research misconduct were received and dismissed after informal investigation.

2.2.2 One allegation of student research misconduct was investigated and dismissed after initial discussions had taken place with the student concerned.

2.2.3 One allegation of academic staff research misconduct was dismissed after a formal investigation, but is still in the process of litigation.

3. **External engagement**

3.1 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. The UKRIO took part in an annual visit to the University, and continue to offer advice and support in areas of research ethics and integrity to the UEC as and when required.

3.2 The Director of the UK Council for Graduate Education (UKCGE) was invited to the University Ethics Committee to discuss the work of the UKCGE, and a joint workshop is being delivered on 28 June 2019 with UKCGE as a result of this visit, related to student employability, particularly focussing on arts and humanities disciplines.

3.3 Professor Alastair Niven is an active external member of the University Ethics Committee, and continues to offer invaluable help and support.

4. *Funder-specific activities*

- 4.1 The RSO regularly reviews policy relating to researchers and projects supported by particular funding bodies and disseminates this as appropriate across the academic community.
- 4.2 RSO and academic staff are supported to attend funder specific workshops and training in this area, and the intranet is currently being updated to make funder regulations, guidance, and example of good practice more widely available.
- 4.3 RKECC 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.