



TO: **BOARD OF GOVERNORS, 24th JUNE 2015**

FROM: VICE-CHANCELLOR

PREPARED BY: VICE-PROVOST (RESEARCH & ENTERPRISE)

DATE: 8th JUNE 2015

APPROVED BY
VICE-CHANCELLOR:

A handwritten signature in blue ink, appearing to read 'Alun H. Jones', is written over the 'APPROVED BY' line.

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

1. **PURPOSE**

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 HEFCE 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 HEFCE web-site: <http://www.hefce.ac.uk/rsrch/integrity>

1.2 The funding agreements for 2013-14 therefore state:

'The institution is required to comply with the Concordat to Support Research Integrity published by Universities UK in July 2012 [...] Institutions in receipt of research grant from the Council are also required to provide assurance of their compliance with the Concordat through the annual assurance return to the Council and following any guidance that the Council may provide. Institutions will be asked to confirm their compliance with the Concordat in the annual assurance statement, which will be subject to routine audit. Institutions will not be required to provide additional evidence in the assurance return. We will additionally monitor the implementation of the concordat through the information shared by other funders at the integrity working group (see paragraph 13).'

1.3 A report on compliance by Bath Spa University is attached for consideration.

2. **BACKGROUND**

2.1 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.

- 2.2 The UK research base enjoys a very high reputation for the excellence and integrity of its activity and outputs. Research integrity is fundamental to maintaining this, and to ensuring that these outputs can confidently be used to contribute to economic growth and national wellbeing.
- 2.3 Following consideration at RCSC on 20 March 2014, amended documents were circulated to Schools for consideration and approval.
- 2.4 RCSC subsequently approved the documents in the form of a handbook for Research Ethics and Integrity at Bath Spa University, for consideration at Academic Board.
- 2.5 Academic Board approved the handbook for immediate implementation at its meeting in July 2014. The handbook can be found on the University's website at:
<https://thehub.bathspa.ac.uk/research-integrity-and-ethics>
- 2.6 In line with statutory requirements, the University is now asked to confirm its compliance with the Concordat in the annual assurance statement to HEFCE.

3. **DISCUSSION**

- 3.1 Governors are asked to discuss the report attached to enable the Chief Executive officer to include a statement of compliance in the HEFCE annual assurance statement.
- 3.2 Governors are asked to note that a working group has been set up to develop a policy to embed research integrity principles across the whole University, within both the undergraduate and postgraduate curricula, and across validation and quality assurance processes.

4. **RISK**

- 4.1 As set out in section 1.1 above, compliance with the Concordat to Support Research Integrity is a condition of HEFCE grant from 2013-14, for institutions eligible to receive HEFCE funding for research.
- 4.2 If the University does not include a statement of compliance in its annual assurance statement, it will risk the payment of HEFCE grant in 2016/17.

5. **RECOMMENDATION**

- 5.1 That Board of Governors consider the compliance report attached for approval and inclusion in the HEFCE annual assurance statement.



Compliance of Bath Spa University with the Concordat to Support Research Integrity – June 2015
report to Governors

1. In line with the University's statement on Research Integrity and Ethics (Annex A), the University Research, Consultancy and Scholarship Committee (RCSC) has taken the following actions and activities in the 2014/15 academic year to support and strengthen understanding and application of research integrity issues:
 - Two 6 monthly reviews of the number of applications for ethical approval that have been considered by Schools.
 - A discussion at RCSC on 21 May on the effectiveness of the existing Ethical Procedures, and the composition of School Ethics Committees.
 - Consideration at RCSC of 21 May of revised procedures for Ethical Approvals across the University, leading to the appointment of a working group to take this work forward and report back to RCSC at the start of the 2015/16 academic year. Membership to include representatives from academic schools, research support, academic services and project support.
 - Monitoring of the completion of on-line training on Ethics undertaken by academic staff and PGR students across the 2014-15 academic year, and an approval of a policy to make this mandatory for all academic staff, with associated guidance and resources put in place to support this action from the start of the 2015/16 academic year.
2. There have been no allegations of misconduct in the 2014/15 academic year. Current processes continue to be appropriate to the needs of the organisation.
3. No formal investigations of research misconduct have been undertaken in the 2014/15 academic year.
4. The Vice-Provost, Research & Enterprise confirms that the University continues to ensure that its environment promotes and nurtures a commitment to research integrity, and that suitable processes are in place to deal with misconduct. This statement will be made publicly available on the University's website, upon confirmation of the Board of Governor's approval of this report.

Annex A: Statement on Research Integrity and Ethics at Bath Spa University

1. Background

This document sets out the University's approach to Research Integrity and Ethics, and in line with the UUK Concordat to Support Research Integrity¹, sets out our commitment to the following principles:

- That our research is underpinned with common values of rigour and integrity
- That we nurture a research environment that supports research of the highest standards of rigour and integrity
- That our research confirms to all ethical, legal and professional obligations
- That we use transparent, robust and fair processes to handle allegations of misconduct
- That we continue to monitor, and where necessary improve, the suitability and appropriateness of the mechanisms in place to provide assurances over the integrity of research

2. Introduction

2.1 *Definition:* In line with the UK funding bodies' definition as set out in the UK Concordat, research is defined as 'a process of investigation leading to new insights, effectively shared...It includes work of direct relevance to the needs of commerce, industry, and to the public and voluntary sectors; scholarship; the invention and generation of ideas, images, performances, artefacts including design, where these lead to new or substantially improved insights; and the use of existing knowledge in experimental development to produce new or substantially improved materials, devices, products and processes, including design and construction'.

2.2 *Scope:* In line with the RCUK Policy and Guidelines on Governance of Good Research Conduct², this document is relevant to all individuals involved in research, irrespective of the subject of research, entry into research or any other consideration, including the following:

- undergraduate and postgraduate students undertaking research as part (or all) of a postgraduate qualification whether taught or by research (MPhil/PhD)
- all staff (academic, contracted and support) doing personal research, collaborative research with outside organisations, contract research and consultancy
- all staff (academic, contracted and support) undertaking research with students or with other members of staff

2.3 *Expectations:* The principles and guidelines set out in this document apply to Bath Spa University researchers, research support staff and students, all of whom are expected to observe the highest standards of integrity, honesty and professionalism, and to embed good practice in every aspect of their work. This includes the interpretation and presentation of research results and contributions to the peer review process and the training of new researchers, staff and students as well as the conduct of the research itself. That is, individual actions must comply with the principles of honesty, openness, transparency and research rigour.

¹ UUK – The Concordat to Support Research Integrity:
<http://www.universitiesuk.ac.uk/highereducation/Pages/Theconcordattosupportresearchintegrity.aspx>

² RCUK Policy and Guidelines on Governance of Good Research Conduct
<http://www.rcuk.ac.uk/Publications/researchers/grc/>

3. Maintaining the Highest Standards of Research Integrity

- 3.1 In line with the UK Concordat, staff at the University are expected to maintain the highest standards of rigour and integrity in all aspects of research, the core elements of which are: honesty; rigour; transparency and open communication; care and respect. These apply to all aspects of research, including the preparation and submission of grant and project proposals, the publication and dissemination of findings, and the provision of expert review on the proposals or publications of others (peer review).
- 3.2 In order that researchers are enabled to understand the expected standards of rigour and integrity relevant to their research, and maintain the highest standards of rigour and integrity in their work at all times, the University has developed a Code of Good Practice for Research (Appendix A), which sets out the expectations of staff undertaking research, and the procedures that the University has in place to ensure that research is conducted in accordance with standards of best practice, including systems to promote research integrity, and transparent robust and fair processes to investigate alleged research misconduct. This includes collaborative research and research involving international partnerships.
- 3.3 The University has a commitment to support researchers to understand and act according to expected standards, values and behaviours, through the provision of a researcher development programme, and through its leadership development programme, to ensure that a supportive and informed research environment is available for all staff across the University. This includes defending them when they live up to these expectations in difficult circumstances. This commitment is set out in the University's Action Plan for the implementation of the Concordat to Support the Career Development of Researchers, and recognised through its HR Excellence in Research award³.
4. The conduct of research according to appropriate ethical, legal and professional frameworks, obligations and standards
- 4.1 In addition to the core principles that underpin integrity, research is governed by a range of ethical, legal and professional frameworks, obligations and standards. These frameworks are important in maintain and enhancing public trust in research. The University's approach to ensuring that staff adhere to these frameworks can be found in its Code of Good Practice for Research.
- 4.2 The University has a clear policy on ethical approval which is available to all researchers, and ensures that all researchers are aware of and understand policies and processes relating to ethical approval through its researcher development programme.
- 4.3 Advice and guidance on ethical, legal and professional obligations and standards can be accessed through the availability of supervising tutors and Directors of Study, research mentors in Research Centres and Schools, and through the University's Research Support Office.

³ Bath Spa University HR Excellence in Research Award and Action Plan for the implementation of the Concordat for the Career Development of Researchers can be found at:
<http://www.bathspa.ac.uk/research/hr-excellence-in-research>

5. Embedding a Culture of Research Integrity

- 5.1 In line with the UK Concordat, the University is committed to providing 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.
- 5.2 The University has set out its policies, practices and procedures in relation to research ethics and integrity in its Code of Good Practice for Research. The code is available on the University website, and is embedded in aspects of the Researcher Staff Development programme, the Graduate School training programme, and School ethics approval processes.
- 5.3 Research tutors and mentors are available in all Schools to support staff engaged in research activities, and a clear Line Management system is put in place for all staff employed on research projects. Principal Investigators responsible for research teams are required to undertake leadership and Staff Development Review Training. This should ensure that potential concerns are raised at an early stage, and that support is provided for those researchers in need of assistance.
- 5.4 As set out in in the University's Action Plan for the Implementation of the Concordat for the Career Development of Researchers and recognised in our HR Excellence in Research award, the University strives to ensure that it has a research environment that nurtures good research practice and encourages a culture of research integrity. An evaluation and review of our Action Plan takes place each year.
- 5.5 The University has made a commitment to supporting researcher development through a subscription to the Vitae Research Development Framework (RDF) Planner⁴, and aims to incorporate the use of the planner as part of the annual Staff Development Review process. The RDF Planner is a unique and up-to-date approach to professional development planning for researchers, and enables researchers to identify expertise and capabilities, plan their professional development, set personal targets and store evidence of success. Through encouraging and advocating widespread use of the planner, the University aims to ensure that researchers should take an active role in their own personal development.
- 5.6 The University also recognises that it has a duty of care to its own staff, and that this includes the avoidance of harm to those undertaking research. All staff are able to access an Employee Wellbeing Assistant Programme– Lifeworks⁵ – which offers advice on matters such as health, family and work-life balance, and also provides staff with an independent counselling service if required. Students are able to seek help and advice through the University Student Support Service⁶.

6. Research Misconduct

- 6.1 In line with the Concordat, the University is committed to using transparent, robust and fair processes to deal with allegations of research misconduct, should they arise. The University's Procedure for Dealing with Allegations of Misconduct in Research clearly sets out definitions of

⁴ Details of the Vitae RDF can be found at: <https://www.vitae.ac.uk/researchers-professional-development/about-the-vitae-researcher-development-framework>

⁵ Lifeworks <http://www2.bathspa.ac.uk/services/hr/for-staff/work-life-balance/EAP.asp>

⁶ Student Support Service <http://www.bathspa.ac.uk/study-with-us/giving-you-support>

misconduct, and the procedures that have been put in place to deal with it effectively and fairly.

- 6.2 The Vice-Provost, Research & Enterprise is responsible for ensuring that allegations of misconduct are dealt with appropriately, and for ensuring that the correct steps are taken to remedy any situations arising out of an investigation. This can include imposing sanctions, correcting the research record and reporting any action to regulatory and statutory bodies, research participants, funders or other professional bodies as circumstances, contractual obligations and statutory requirements dictate.
- 6.3 The University has a duty to ensure that individual researchers are aware of their responsibilities in relation to misconduct, and to embed an awareness and understanding of these within the researcher staff development programme.
- 6.4 The University has a student complaints policy and set of procedures⁷ through which students are able to raise any issues or concerns relating to academic misconduct.
- 6.5 The University has a Public Interest Disclosure Policy and Procedures, the purpose of which are to encourage staff to raise genuine concerns about malpractice within the University without being subject to any detriment including victimisation and disciplinary action up to and including dismissal. These include concerns about the integrity of research being conducted under the University's auspices.
7. Commitment to Strengthening Research Integrity
- 7.1 In line with the Concordat, the University is committed to strengthening the integrity of research and to reviewing progress regularly and openly, and that these are communicated openly and effectively.
- 7.2 The University's Research, Consultancy and Scholarship Committee (RCSC) reviews this commitment by taking the following actions:
- Reviewing on a regular basis, the number of applications for ethical approval that have been considered by Schools
 - Considering a summary of actions and activities that have been undertaken to support and strengthen understanding and application of research integrity issues
 - Evaluating processes for allegations of misconduct to ensure that they are transparent, robust and fair, and that they continue to be appropriate to the needs of the organisation
 - Receiving a report on any formal investigations of research misconduct that have been undertaken
- 7.3 The Vice-Provost, Research & Enterprise, is responsible for providing an annual statement to the Board of Governors summarising the RCSC report, and confirming that the University continues to ensure that its environment promotes and nurtures a commitment to research integrity, and that suitable processes are in place to deal with misconduct. This statement will be made publicly available on the University's website.

⁷ Student Complaints policy and procedures: <http://www.bathspa.ac.uk/regulations/complaints-policy>