

Research Integrity

- This paper seeks the Committee's advice on: the revised Concordat to support research integrity; and SFC's position in relation to UKRI's proposed Research Integrity Committee

Recommendations

- Note the proposed revisions to the Concordat to support research integrity.
- Discuss the establishment of UKRI's Research Integrity Committee and the implication for Scottish HEIs;
- Recommend an approach for engagement with the Research Integrity Committee

Financial implications

- No immediate financial implications

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Purpose

1. This paper seeks the Committee's advice on
 - The revised Concordat to support research integrity; and
 - SFC's position in relation to UKRI's proposed Research Integrity Committee.

Background

2. The Committee last discussed Research Integrity in March 2019 ([RKEC 19/05](#)).
3. SFC, in common with other significant UK funders of research and Universities UK (UUK), since 2012, has been a signatory of the Concordat to support research integrity.
4. The Concordat was developed by UUK in collaboration with the funding and research councils, the Wellcome Trust and various government departments. It sets out five commitments each of which sets out clear expectations for researchers, employers of researchers and funders of researchers. These are intended to provide assurances to government, the wider public and the international community that research in the UK continues to be underpinned by the highest standards of rigour and integrity.
5. The Concordat recognises that research in the UK is already subject to rigorous safeguards and does not seek to supersede or replace these statutory and regulatory standards but rather it is designed to be complementary and to set existing guidance in a broader national framework. Scottish HEIs are required as part of their Outcome Agreements to provide "evidence of compliance with the principles set out in the Universities UK Concordat to support research integrity".
6. In 2018, the UK House of Commons Science and Technology Committee undertook an enquiry into Research Integrity. Recommendations included:
 - Strengthening of the Concordat; and
 - Establishment, by UKRI, of a new independent body to monitor compliance and advise on any sanctions.
7. Since original publication, UUK has continued to co-ordinate the work of the signatories on the Concordat, including discussion of revisions.

Revising the Concordat

8. The signatories, including SFC, agreed to act on the Westminster enquiry's recommendations to strengthen and update the Concordat.

Revised concordat: funders

9. The expectations on funders of research in the original and revised concordats are summarised in annex A, table 1. New expectations are highlighted.
10. The main changes to the concordat from SFC's perspective are:
 - publish contact details for a senior lead with responsibility for research integrity and a first point of contact;
 - consider our policies and whether they may have any negative effects on research integrity;
 - associating compliance with our funding conditions (we already do this through outcome agreements, although there may be scope to strengthen this).
11. As signatories we would undertake to produce an annual statement (to be put together nationally by the Concordat secretariat) and hold an annual conference (again led by the secretariat, although we may need to put in minimal funding). To date UUK have provided secretariat for the Concordat.

Revised concordat: HEIs

12. The concordat tightens up what we expect of institutions – for example the *recommendation* that they 'should identify a senior member of staff to oversee research integrity and to act as first point of contact' becomes a clear *expectation* that such a member of staff is identified and that this information is publically available.
13. The expectations of employers of researchers are set out in annex A, table 2.
14. The main changes for institutions are:
 - publically available named contacts as set out above;
 - participation in an annual monitoring exercise to demonstrate that the institution has met the commitments of the concordat;
 - take reasonable steps to resolve any issues found during an investigation;
 - production of a short annual statement which is made publically available.
15. It is intended that the secretariat for the Concordat take the lead here as with production of the annual statement from signatories and the annual forum. (To date UUK have provided secretariat for the Concordat. Establishment of the Research Integrity Committee and its secretariat may lead to further discussions on the location of this responsibility.)

UKRI Research Integrity Committee

16. UKRI have explored the possibility of establishing a body independent of UKRI to perform the functions sought by the House of Commons' Science and Technology Select Committee and concluded that this is unlikely to be feasible without legislative adjustments. UKRI has therefore been granted UK Government approval to instead establish a Research Integrity Committee with an independent chair. This will:
 - champion best practice;
 - produce an annual report on the health of the sector vis a vis research integrity;
 - check that institutions have complied with policies and terms & conditions of funding when investigating research misconduct, and provide oversight of research grant funding through reviewing investigation documents;
 - advise the relevant funder on the outcome of reviews, and recommend appropriate recourse if deemed necessary.
17. UKRI agree that *employers* should still have the first responsibility for investigating and taking action in response to allegations.
18. To ensure that conditions of funding have been met and a greater level of assurance over public funds, *where funding derives from UKRI*, HEIs will be required to report alleged cases of research misconduct to UKRI and to the Research Integrity Committee. This includes cases (in English HEIs) where a specific research project has been funded by non-UKRI funders, if it has been underpinned by UKRI (Research England) QR funds.
19. For Scottish HEIs, this would mean that any relevant cases where there had been financial support from UKRI (which would be underpinned by SFC's REG) would have to be reported to the Committee. Scottish HEIs would normally be expected to report such cases to SFC (under the Financial Memorandum). There is also scope for SFC to request that the UKRI Committee flags any cases identified in Scottish HEIs.
20. As things stand, any other cases arising in Scottish HEIs, potentially supported by REG, should be reported directly to SFC under standard assurance processes. These would not be reported to the Research Integrity Committee.
21. UKRI has engaged with SFC, and other devolved funding bodies, on development of the Research Integrity Committee's remit, and are seeking to explore whether the remit could include research funded by SFC (and the other UK funding bodies) but not by UKRI. UKRI believe that partnership with the devolved administrations' funding bodies would be mutually beneficial – providing a better understanding of the issue nationally and giving greater

confidence in assurance checks on publicly funded research. UKRI therefore has extended an open invitation for joint working and sharing of best practice on research integrity.

22. Discussion by RKEC so far on the potential establishment of a UK body to oversee research integrity has noted concerns on:
 - Potential for multiple assurance regimes applying to Scottish HEIs;
 - Sensitivities on a UK body acting on behalf of SFC in a devolved matter;
 - Sensitivities on a UK recommendation on a devolved matter;
 - Inadequate recognition of HEIs' independent and fundamental role in protecting research integrity, going beyond the financial investment and return for individual funders.

23. The advantages of engaging with the UKRI Research Integrity Committee include:
 - Consistency of approach across the UK
 - Avoidance of duplication of effort where the cases reviewed are supported by different funders, say, UKRI and SFC
 - Scope to ensure that understanding of the Scottish context is built into a mechanism to which Scottish HEIs will be subject

24. Disadvantages of engaging include:
 - Adopting a different approach to Research Integrity cases from the existing mechanisms used for other investigations in Scotland
 - Scottish approaches may be constrained by the consensus approach of other partners

25. RKEC is asked to consider and advise upon whether SFC should:
 - Partner with, and make use of, UKRI's Research Integrity Committee on oversight of relevant investigations; or
 - Continue with current approaches to investigation of alleged research misconduct.

26. We are continuing to engage with HEFCW and DfENI on their response to this proposal.

27. We will continue to work with UUK and other signatories on common implementation of the Concordat to support research integrity, regardless of the position on compliance oversight.

Financial implications

28. No immediate financial implications

Recommendations

The Concordat

29. RKEC is invited to:

- Note the proposed revisions to the Concordat to support research integrity.

Research Integrity Committee

30. RKEC is invited to:

- Discuss the establishment of UKRI's Research Integrity Committee and the implication for Scottish HEIs;
- Recommend an approach for engagement with the Research Integrity Committee

Publication

31. This paper will be published on the Council website.

Further information

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Table 1: Expectations of funders of research

<p>Commitment One: We are committed to upholding the highest standards of rigour and integrity in all aspects of research.</p>	
<p>Funders of research expect:</p> <ul style="list-style-type: none"> • researchers to adhere to the highest standards of professionalism and integrity • employers of researchers to have procedures in place to ensure that research is conducted in accordance with standards of best practice; systems to promote research integrity; and transparent, robust and fair processes to investigate alleged research misconduct 	<p>Funders of research will:</p> <ul style="list-style-type: none"> • publish clear statements of their expectations of researchers and employers of researchers with respect to standards of professionalism and integrity • take research integrity into account in the development of policies and processes • encourage adoption of the concordat by associating it with their funding conditions.
<p>Commitment Two: We are committed to ensuring that research is conducted according to appropriate ethical, legal and professional frameworks, obligations and standards.</p>	
<p>Funders of research will:</p> <ul style="list-style-type: none"> • clearly identify any specific codes of practice, legal requirements and other policies that researchers and employers of researchers are expected to comply with • explore ways of streamlining requirements to reduce any duplication and inconsistency 	<p>Funders of research will:</p> <ul style="list-style-type: none"> • through engagement with the signatories and other stakeholders, explore ways of streamlining their requirements to reduce duplication inconsistency and/or conflict. • ensure that their requirements are, through regular review, proportionate, relevant and consistent with the expectations of the concordat. • incorporate proportionate checks, where appropriate, in the application and award process related to legal and ethical requirements. • only provide funding to organisations that can demonstrate that appropriate structures are in place to ensure research integrity in their research activities.

	<ul style="list-style-type: none"> • clearly identify and signpost any specific codes of practice and other policies that researchers and employers of researchers are expected to comply with, beyond those that might be generally expected.
<p>Commitment three: We are committed to 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</p>	
<p>Funders of research are responsible for:</p> <ul style="list-style-type: none"> • promoting adoption of the concordat within the research community • supporting the implementation of the concordat through shared guidance, policies and plans <p>Funders of research could encourage adoption of the concordat by associating it with their conditions of grant.</p>	<p>Funders of research will:</p> <ul style="list-style-type: none"> • promote adoption of the concordat within the research community • support the implementation of the concordat through shared guidance, policies and plans • identify within their organisation a senior member of staff responsible for oversight of research integrity and ensure that this information is publicly available on the organisation's website. • identify within their organisation a named lead contact for research integrity, and ensure that contact details for this person are kept up to date and are publicly available on the organisation's website. • consider whether their policies and processes create disincentives for the creation and embedding of a positive research culture. • work in partnership with employers and researchers to embed a culture of integrity in the research community. • encourage adoption of the concordat by associating it with their funding conditions.
<p>Commitment four: We are committed to using transparent, timely, robust and fair processes to deal with allegations of research misconduct when they arise</p>	
<p>Funders of research will:</p> <ul style="list-style-type: none"> • have clear expectations of what constitutes research misconduct 	<p>Funders of research will:</p> <ul style="list-style-type: none"> • publish clear statements of what constitutes research misconduct • ensure that recipients of funding are aware of requirements

<ul style="list-style-type: none"> • ensure that recipients of funding are aware of requirements regarding the investigation and reporting of research misconduct, and that these are openly stated 	<p>regarding the investigation and reporting of research misconduct, and that these are openly stated</p> <ul style="list-style-type: none"> • work with employers of researchers to manage funding appropriately, including any staff supported by an affected project • treat all allegations with confidentiality and abide by data protection laws with respect to data management • take appropriate action when research misconduct is reported to them. In the most serious case this could include funding sanctions or mandatory improvements.
<p>Commitment five: We are committed to working together to strengthen the integrity of research and to reviewing progress regularly and openly.</p>	
	<p>Funders of research will:</p> <ul style="list-style-type: none"> • periodically review their policies and grant conditions to ensure that they support good practice in research integrity. • periodically review their processes and practices to ensure that they are not providing inappropriate incentives.

Table 2: Expectations of employers of researchers

<p>Commitment One: We are committed to upholding the highest standards of rigour and integrity in all aspects of research.</p>	
<p>Employers of researchers are responsible for:</p> <ul style="list-style-type: none"> • collaborating to maintain a research environment that develops good research practice and nurtures a culture of research integrity, as described in commitments 2 to 5 • supporting researchers to understand and act according to expected standards, values and behaviours, and defending them when they live up to these expectations in difficult circumstances 	<p>Employers of researchers are responsible for:</p> <ul style="list-style-type: none"> • maintaining a research environment that develops good research practice and embeds a culture of research integrity, as described in commitments 2 to 5 • supporting researchers to understand and act according to expected standards, values and behaviours • defending researchers when they live up to the expectations of this concordat in difficult circumstances • demonstrating that they have procedures in place to ensure that research is conducted in accordance with standards of best practice; systems to promote research integrity; and transparent, robust and fair processes to investigate alleged research misconduct.
<p>Commitment Two: We are committed to ensuring that research is conducted according to appropriate ethical, legal and professional frameworks, obligations and standards.</p>	
<p>Employers of researchers are responsible for:</p> <ul style="list-style-type: none"> • having clear policies on ethical approval available to all researchers • making sure that all researchers are aware of and understand policies and processes relating to ethical approval • supporting researchers to reflect best practice in relation to ethical, legal and professional requirements • having appropriate arrangements in place through which 	<p>Employers of researchers must:</p> <ul style="list-style-type: none"> • have clear policies on ethical review and approval available to all researchers • make sure that all researchers are aware of and understand policies and processes relating to ethical approval • support researchers to adopt best practice in relation to ethical, legal and professional requirements • have appropriate arrangements in place through which

researchers can access advice and guidance on ethical, legal and professional obligations and standards	researchers can access advice and guidance on ethical, legal and professional obligations and standards
<p>Commitment three: We are committed to 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.</p>	
<p>Employers of researchers will:</p> <ul style="list-style-type: none"> • embed these features in their own systems, processes and practices • work towards reflecting recognised best practice in their own systems, processes and practices • implement the concordat within their research environment <p>As part of a commitment to ensuring that research integrity receives appropriate consideration, the concordat also recommends that employers of researchers should identify a senior member of staff to oversee research integrity and to act as first point of contact for anyone wanting more information on matters of research integrity.</p>	<p>Employers of researchers will:</p> <ul style="list-style-type: none"> • embed these features in their own systems, processes and practices • reflect recognised best practice in their own systems, processes and practices • implement the concordat within their research environment • participate in an annual monitoring exercise to demonstrate that the institution has met the commitments of the concordat. • promote training opportunities to research staff and students, and encourage their uptake. • identify a named senior member of staff to oversee research integrity and ensure that this information is kept up to date and publicly available on the institution’s website. • identify a named member of staff who will act as a first point of contact for anyone wanting more information on matters of research integrity and ensure that contact details for this person are kept up to date and are publicly available on the institution’s website.
<p>Commitment four: We are committed to using transparent, timely, robust and fair processes to deal with allegations of research misconduct when they arise</p>	
<p>As part of existing mechanisms and conditions of grant, employers of researchers should already:</p>	<p>Employers of researchers must:</p> <ul style="list-style-type: none"> • have clear, well-articulated and confidential mechanisms for

- have clear, well-articulated and confidential mechanisms for reporting allegations of research misconduct
- have robust, transparent and fair processes for dealing with allegations of misconduct that reflect best practice
- ensure that all researchers are made aware of the relevant contacts and procedures for making allegations
- act with no detriment to whistleblowers making allegations of misconduct in good faith
- provide information on investigations of research misconduct to funders of research and professional and/or statutory bodies as required by their conditions of grant and other legal, professional and statutory obligations
- support their researchers in providing appropriate information to professional and/or statutory bodies

Additionally, the concordat recommends that **employers of researchers** provide a named point of contact or recognise an appropriate third party to act as confidential liaison for whistleblowers or any other person wishing to raise concerns about the integrity of research being conducted under their auspices. This need not be the same person as the member of staff identified to act as first point of contact on research integrity matters, as recommended under Commitment #3.

- reporting allegations of research misconduct
- have robust, transparent and fair processes for dealing with allegations of misconduct that reflect best practice. **This includes the use of independent external members of formal investigation panels, and clear routes for appeal.**
- ensure that all researchers and other members of staff are made aware of the relevant contacts and procedures for making allegations
- act with no detriment to whistleblowers who have made allegations of misconduct in good faith, **or in the public interest, including taking reasonable steps to safeguard their reputation. This should include avoiding the inappropriate use of legal instruments, such as non-disclosure agreements.**
- **take reasonable steps to resolve any issues found during the investigation. This can include imposing sanctions, requesting a correction of 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.**
- **take reasonable steps to safeguard the reputation of individuals who are exonerated.**
- provide information on investigations of research misconduct to funders of research and to professional and/or statutory bodies as required by their conditions of grant and other legal, professional and statutory obligations
- support their researchers in providing appropriate information when they are required to make reports to professional and/or statutory bodies

	<ul style="list-style-type: none"> • provide a named point of contact or recognise an appropriate third party to act as confidential liaison for whistleblowers or any other person wishing to raise concerns about the integrity of research being conducted under their auspices. This need not be the same person as the member of staff identified to act as first point of contact on research integrity matters, as recommended under Commitment three.
<p>Commitment five: We are committed to working together to strengthen the integrity of research and to reviewing progress regularly and openly.</p>	
<p>Employers of researchers also need to be confident that the procedures and practices they have in place are robust. Given the changing nature of concerns relating to research integrity and the emergence of new types of research, it is important that employers periodically review their processes to ensure that they remain ‘fit for purpose’.</p>	<p>Employers of researchers will:</p> <ul style="list-style-type: none"> • take steps to ensure that their environment promotes and embeds a commitment to research integrity, and that suitable processes are in place to deal with misconduct. • produce a short annual statement, which must be presented to their own governing body, and subsequently be made publicly available, ordinarily through the institution’s website. This annual statement must include: <ul style="list-style-type: none"> ○ a summary of actions and activities that have been undertaken to support and strengthen understanding and application of research integrity issues (for example postgraduate and researcher training, or process reviews) ○ a statement to provide assurance that the processes the institution has in place for dealing with allegations of misconduct are transparent, timely, robust and fair, and that they continue to be appropriate to the needs of the organisation ○ a high-level statement on any formal investigations of research misconduct that have been undertaken, which

	<p>will include data on the number of investigations. If no formal investigation has been undertaken, this should also be noted.</p> <ul style="list-style-type: none">○ a statement on what the institution has learned from any formal investigations of research misconduct that have been undertaken, including what lessons have been learnt to prevent the same type of incident re-occurring.○ a statement on how the institution creates and embeds a research environment where all staff, researchers and students feel comfortable to report instances of misconduct. <ul style="list-style-type: none">• periodically review their processes to ensure that they remain 'fit for purpose.' <p>To improve transparency, a link to the statement should be sent to the secretariat of the signatories of the concordat.</p>
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