


TO: **BOARD OF GOVERNORS, 24th JULY 2020**

FROM: Pro-Vice Chancellor (Research & Enterprise)

PREPARED BY: Pro-Vice Chancellor (Research & Enterprise)

DATE: 24/07/20

APPROVED BY
VICE-CHANCELLOR: 

SUBJECT: **UPDATED: 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 website: <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 reports on compliance by Bath Spa University for 2014/15, 2015/16, 2016/17, 2017/18 and 2018/19. 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 2019/20 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 Ethics Committee (REC) and the newly established University Ethics Panel (UEP) has taken a number of actions and activities in the 2019/20 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 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 or HEIs in relation to compliance for both UKRI funded research projects, and for the hypothecated use of HEQR funding:
- 3.2.1 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 meet 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.

- 3.2.2 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 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.
- 3.4 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 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 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 2020/21

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

Academic Year 2019/20 Bath Spa University Annual Compliance Statement with the Concordat to Support Research Integrity – July 2020 report to Governors

Introduction

The UK 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 2019/20 report for Bath Spa University has been collated by the Research Support Office in consultation with Schools, and approved by the University Ethics Panel.

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 as a result of changing legislation and institutional policy, and is discussed and agreed at the University Ethics Panel.
- 1.2 As a result of an internal review, as well as changes to the University structure from August 2019, ethics policies and procedures were comprehensively reviewed in the 2019/20 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 has worked to develop toolkits and resources on the

University intranet for Undergraduate and Postgraduate Taught students, 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 is being trialled during the 2019/20 academic year, as well as collated resources on the University intranet

- 1.6 A suite of on-line Research Ethics and Integrity materials was put in place last academic year - through the provider Epigeum - and the Concise introduction to Research Integrity course was made 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
- 1.7 Significant work has been carried out during the 2019/20 academic year to embed this on-line training, and to increase staff uptake. 93% of academic staff have now undertaken this training as of the end of the 2019/20 academic year
- 1.7.1 A breakdown of completion of the introductory compulsory ethics training across academic staff within the Schools is set out below:
 - Bath School of Art = 97%
 - Bath School of Design = 88%
 - School of Education = 100%
 - School of Humanities = 91%
 - Bath Business School = 85%
 - School of Creative Industries = 95%
 - School of Sciences = 90%
 - Bath School of Music and Performing Arts = 84%

UEP has taken action to address compliance across the new School structure and to ensure that all academic staff complete the mandatory training over the 2019/20 academic year, resulting in a **year-on-year improvement of institutional compliance of 32%** (2018/19 = 61%, 2019/20 = 93%). This has included targeted e-mail campaigns, as well as through work with the newly established School Ethics Leads to disseminate communications and to support staff in accessing and completing the training. Work is now taking place to ensure continued momentum and that new starters complete the training in a timely manner upon starting. This includes trialling a new, more user-friendly version of the training course to continue to encourage uptake.

- 1.7.2 In addition to the above, the Introduction to Research Integrity module has been completed by the following:
 - 4 Professional services staff
 - 9 PhD students
 - 13 Undergraduate students
- 1.7.3 The more detailed training available through discipline specific modules which is optional for staff and students has been completed by the following:
 - 70 professional services staff
 - 194 academic members of staff
 - 24 PhD students
 - 20 postgraduate students
 - 65 Undergraduate students
- 1.8 A new monitoring system has been put in place for the review of ethical approvals,

centralised through the RSO, and summary data is set out below:

1.8.1 Liquid office initial review process (Stage 1)

- 12 staff and 0 PhD student applications have been recorded as receiving ethical clearance with no need for further review
- 49 staff and 17 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.

1.8.2 School level ethical review process (Stage 2)

- Bath School of Art & Bath School of Design
 - 2 staff applications were considered, both were approved
 - 0 PhD applications were considered
- School of Sciences
 - 15 staff applications have been considered of which 10 have been approved, 3 are in process, 2 are on hold pending funding award.
 - No PhD applications were received for consideration
- School of Education
 - 17 staff applications were considered, of which 14 were subsequently approved, 1 is still under review, 2 are on hold pending funding award.
 - 8 PhD applications were considered, of which 5 was subsequently approved, 3 are still under review.
- School of Humanities
 - 2 staff applications were considered, of which 1 was subsequently approved, and 1 is still under review
 - 1 PhD application is still under review
- Bath Business School
 - 3 staff applications were considered, 3 are still under review
 - 1 PhD student application was approved.
- School of Creative Industries
 - 6 staff applications were considered, 4 were subsequently approved, 2 are still under review
 - 2 PhD student applications were considered, 1 was subsequently approved, and 1 is still under review
- Bath School of Music and Performing Arts
 - 2 staff applications were considered, 2 were subsequently approved
 - 3 PhD student applications were considered, 2 were subsequently approved, and 1 is still under review

1.8.3 University level ethical review process

- 1 PhD application has been considered which was approved.
- 1 staff application has been considered, which was approved.
- UEP has also considered policy and procedures relating to student placements and research co-created between staff and students.

1.9 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.

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. A further review will be taking place in consultation with the University Secretary to incorporate the new recommendations from Research England for the reporting of allegations of misconduct arising from research funded through UKRI and through Research England through the use of HEQR funding.
- 2.3 No allegations of research misconduct were received in the 2019/20 academic year.
- 2.4 The allegation of academic staff research misconduct which was dismissed after a formal investigation, but was still in the process of dispute at the end of the 2018/19 academic year (as reported in the 2018/19 annual compliance statement to Governors) has now been resolved and the case closed.

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 Panel to discuss the work of the UKCGE, and a joint workshop was delivered on 28 June 2019 with UKCGE as a result of this visit, related to student employability, particularly focussing on arts and humanities disciplines.
- 3.3.1 Professor Alastair Niven is an active external member of the University Ethics Panel, and continues to offer invaluable help and support.
- 3.3.2 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. *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 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.