




TO: **VICE-CHANCELLOR**

FROM: Professor John Strachan, Pro-Vice Chancellor (Research & Enterprise)

PREPARED BY: Professor John Strachan, Pro-Vice Chancellor (Research & Enterprise)

DATE: 10 September 2018

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/>

Research England now requires institutions eligible to receive research funding to confirm their compliance with the concordat in the annual assurance statement.

1.2 Governors approved a report on compliance by Bath Spa University for 2014/15 at their meeting of 24 June 2015, and for 2015/16 at its meeting on 10 June 2016 and for 2016/17 at its meeting on 28 June 2017. These reports are publicly available on the university's website.

1.3 Recommendation: that Board of Governors consider the compliance report attached for approval and inclusion in the Research England annual assurance statement.

2. SUMMARY

2.1 The University Research, Knowledge Exchange and Consultancy Committee (RKECC) has taken a number of actions and activities in the 2017/18 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 The Deputy Vice-Chancellor also commissioned Professor David Timms to undertake an independent review of the University's ethical processes, and the recommendations and actions identified to address these form part of the annual statement
- 2.3 In line with statutory requirements, the University is now asked to confirm its compliance with the Concordat in the annual assurance 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 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.
- 3.3 Following consideration at RCSC on 20 March 2014, amended documents were circulated to Schools for consideration and approval.
- 3.4 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.
- 3.5 Academic Board approved the handbook for immediate implementation at its meeting in July 2014. The most recent version of the handbook can be found on the University's website at:
<https://thehub.bathspa.ac.uk/research-integrity-and-ethics>.
- 3.6 The University Research, Knowledge Exchange and Consultancy Committee (RKECC) set up an Ethics Working Group at the end of the 2014/15 academic year, to review policies and procedures related to Research Integrity and Ethics, and there is a standing item on the RKECC agenda for updates on the group's activities.
- 3.7 The University was asked to confirm to both the Rt. Hon Normal Lamb MP (Chair of Science & Technology Committee, House of Commons) and Professor Paul Boyle (Chair, Universities UK Research Policy network) in November 2017 that it complies with the UUK Concordat to Support Research Integrity and that an annual report is submitted to the University's Governing Body for approval and published on the university's website.
- 3.8 An action plan has been developed by the University Ethics Committee to address the recommendations set out in professor David Timms' report on the review of the University's Ethical Processes.

4. **DISCUSSION**

- 4.1 Governors are asked to discuss the report attached to enable the Chief Executive

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.

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.



Appendix A

Compliance of Bath Spa University with the Concordat to Support Research Integrity – June 2018 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 2017/18 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 set out in our Handbook on Research Integrity and Ethics which is available to all staff and students through the intranet. This 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 A new policy for ethical approval for academic collaborators and visitors was considered and approved by the University Research, Knowledge Exchange and Consultancy Committee (RKECC), and now applies to all visitors and associate staff undertaking research under the auspices of the University.
- 1.3 Institutional process and guidance are currently being reviewed to meet the new General Data Protection Regulation requirements (GDPR) and a toolkit is being developed by the Research Support Office (RSO) in consultation with colleagues across the University.
- 1.4 The research project on-line Liquid Office stage 1 checklist process had been disseminated widely, and is now being consistently used by both academic staff and PhD students at the start of the research process. Workshops have been developed and delivered to our researcher community through the Research Staff Development programme, and bespoke workshops developed for different disciplines in consultation with the Schools.

- 1.5 The module level Stage 1 process is being reviewed, and is likely to be discontinued and replaced by a toolkit and resources on Minerva for students.
- 1.6 A new 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. A breakdown of completion of compulsory ethics training across academic staff within the Schools is set out below:
- Bath School of Art and Design – 80% of academic staff
 - Institute for Education – 42% of academic staff
 - College of Liberal Arts – 42% of academic staff
- 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)
- 34 staff and 3 PhD student applications have been recorded as receiving ethical clearance with no need for further review
 - 47 staff and 7 PhD student applications have been recorded as needing full ethical approval at School level
- 1.7.2 School level ethical review process (Stage 2)
- Bath School of Art & Design
 - No staff applications have been received
 - 2 PhD applications were considered and subsequently approved
 - College of Liberal Arts
 - 22 staff applications have been considered of which 17 have been approved, 4 are in process and 1 has been rejected
 - 3 PhD applications have been considered, 2 have been approved and 1 is in progress
 - Institute for Education
 - 19 staff applications were considered and subsequently approved
 - 10 PhD applications were considered and subsequently approved
- 1.7.3 University level ethical review process
- 6 staff applications considered – 4 approved and 2 referred back to School level for revisions and resubmission, 1 of which has subsequently been approved.
 - 2 PhD student applications, both of which have been referred back to School level for revision resubmission, both of which have been subsequently approved at School level
- 1.8 In line with Audit Committee recommendations, the University Ethics Committee has undertaken a self-evaluation review of its compliance against the UUK Concordat, and developed an action plan to address any areas of concern, which is monitored on a regular basis.
- 1.9 The Deputy Vice-Chancellor commissioned a review of Ethical approval processes across the university, and the recommendations of the report and actions identified are set out in Annex 1. There are significant resource implications arising out of the

recommendations, and although proposals to address these were included in the annual budget planning round for consideration by the University, they were not approved. The UEC will therefore need to review the action plan to determine how best the recommendations can be addressed.

2. *Addressing research misconduct*

- 2.1 Processes for the reporting and investigating of allegations of research misconduct has now been clearly set out on the University's website, and 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 There was one formal investigation undertaken in the past year relating to an AHRC funded project which was dismissed. In line with RCUK guidelines, the investigation and the outcome were reported to AHRC.
- 2.3 As a result of the above investigation, the academic misconduct policy has been reviewed, and is currently being revised in consultation with the HR department.
- 2.4 A student complaint in relation to the University's consideration of an Application for Ethical Approval in relation to an MA research project is currently still in process (originally submitted in May 2017).

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.

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.

Annex 1

Ethics Review: Progress against Recommendations to Date – September 2018

No.	Recommended Action	Progress of Action to Date
1	Determine the primary audience and purpose of the University's procedural documents for ethical approval, and conduct a thorough overhaul, ensuring that they are consistent, complete, and describe what actually happens.	<p>University Ethics Committee (UEC) met on 15 May 2018 to discuss these issues. It was confirmed that the primary audience of the handbook was University staff and students, and all revisions should reflect this fact.</p> <p>Ethics Working Group (EWG) met on 2 July, and revised documentation was submitted for review by UEC on 13 July 2018.</p> <p>Further revisions have been identified which will be considered by UEC on 8 October 2018.</p>
2	Expand the University's ethics guidance material with more examples and case studies, and look for ways in which commonly-arising situations can be managed using existing protocols.	The EWG has been reconstituted and will develop this material and map them against ethical principles for publication on the intranet early in 2018/19.
3	Review the different 'levels' of ethical approval. Drop the current Stage 1; distinguish between and establish clearer criteria for 'light-touch' review which may be at school level using current procedures and something like the current IfE/BSAD forms, and 'full' approval, which needs consideration at University level, perhaps using a version of the CoLA form. The same system should be used throughout the University.	<p>Ethical approval process and application forms will be reviewed by EWG and updated.</p> <p>Although a request for resources was made in the annual planning round for an On-Line Ethical Approval system to better manage this process, this was not approved.</p> <p>UEC will be considering how to improve the process and procedures for Ethical approval at its meeting on 8 October 2018.</p>
4	Establish a single committee at University level to consider 'full' ethical approvals. In normal circumstances, decisions should be those of the committee rather than individual members or groups of members, though a first/second reader system might be used to manage the work. The membership should include different disciplines and genders, and a lay member. There should be rules governing conflict of interests.	<p>This has been discussed at UEC</p> <p>There would be significant resource implications if this Committee was put in place.</p> <p>A request for a 0.5 Research Governance Manager was made in the annual planning round to work with the Schools in the development and management of robust Research Ethics and Integrity procedures and process. This was not approved.</p> <p>UEC will be considering how to improve the</p>

		process and procedures for Ethical approval at its meeting on 8 October 2018.
5	Ensure that ethics committee minutes are kept in a usable form made available widely.	This resource will be developed in line with the case studies agreed in Recommended Action 2 and made available on the intranet, redacted as appropriate
6	Put more resource into training and awareness in the academic community,	<p>Research Development workshops are being developed for the 2018/19 academic year to supplement the on-line training. This will include:</p> <ul style="list-style-type: none"> - Drop-in workshops for all staff on specific issues - Discipline specific workshops - Line Manager and Research Leaders training workshops - Research data management training <p>A research ethics and integrity toolkit with guidance materials and template examples of consent forms, information sheets, data management plans and risk assessments will be developed jointly with the T&L Directorate. This will be made available on Minerva to support UG and PG teaching and to inform module level research proposals. It is intended that this will replace the Liquid office module approval process.</p>
7	Decisions should be those of the full committee. Time-limits for the determination of applications should be published. Decisions should be communicated in writing and include a short statement of reasons for the decision. There should be an appeals procedure.	<p>This has been discussed at UEC, and resource requirements have been identified as set out above. A decision on this recommendation will await the outcome of those discussions.</p> <p>At the current time, school level reviews are undertaken by 3 panel members, and if there is any uncertainty or grounds for referral, these are then reviewed by the full University Ethics Committee.</p> <p>An appeal process has been developed as part of the review of ethical processes.</p>