

# Consultation on the concordat to support research integrity

## Key points

1. The Royal Society welcomes the opportunity to submit evidence to this consultation. The draft concordat is a positive statement of the importance of research integrity and the breadth of the actors responsible for protecting it.
2. The Society believes that the draft concordat would benefit from greater consistency in terms of both the document itself, as well as its alignment with other related codes such as 'The European Code of Conduct' produced by All European Academies (ALLEA).
3. For each of the five commitments, the concordat sets out expectations and responsibilities for researchers, employers of researchers and funders of research. In some instances, it is unclear how these should be applied in practice and so further clarification would be beneficial.

## Introduction

4. The Royal Society welcomes the opportunity to submit evidence to the Universities UK (UUK) consultation on the concordat to support research integrity. High levels of competition, short funding timescales, and the pressure to publish 'new and exciting' research can incentivise poor practice. It is important the organisations active in the research system pursue action that encourages good practice. The Society is the National Academy of Science for the UK and the Commonwealth. It is a self-governing Fellowship of many of the world's most distinguished scientists working across a broad range of disciplines in academia and industry. The Society draws on the expertise of its Fellows and Foreign Members to provide independent and authoritative scientific advice to UK, European and international decision makers.
5. As both a funder and publisher of scientific research, the Society is acutely aware of the dangers of improper practice. The Society provided written evidence to the 2018 Commons Science and Technology Committee inquiry into research integrity<sup>1</sup>, is a signatory to the San Francisco Declaration on Research Assessment (DORA) and subscribes to the UK Research Integrity Office (UKRIO). As part of the Society's research culture programme of activity, it worked with UKRIO to produce an 'Integrity in practice toolkit<sup>2</sup>'. The toolkit provides information on seven international examples of good practice by organisations to engender better integrity in research.

## General points

6. While implicit, it may be beneficial to include an explicit statement in the introduction that makes clear that everyone involved in science is responsible for ensuring that high quality science is done with honesty, integrity and to high ethical standards.
7. It is proposed that Annexe II of the revised concordat will include 'some useful resources.' As these are not included for review and this is an evolving area with best practice being developed by a range of international organisations, it may be better for links to resources to be hosted on a website that accompanies the final concordat rather than within the document itself.
8. The draft concordat focuses on the responsibilities of researchers, employers of research and funders of research. Other related documents, notably 'The European Code of Conduct for Research Integrity' produced by ALLEA also recognise the responsibilities of publishers of research. The statement on the selection of this set of stakeholders in the introduction of the draft concordat is acknowledged and is sensible and proportionate for the purposes of this exercise. However, it is important to recognise that all parts of the ecosystem contribute to research culture.

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<sup>1</sup> <http://data.parliament.uk/writtenevidence/committeeevidence.svc/evidencedocument/science-and-technology-committee/research-integrity/written/48636.html>

<sup>2</sup> <https://royalsociety.org/topics-policy/projects/research-culture/changing-expectations/integrity-in-practice/>

It would be beneficial to briefly reference that other sources of information exist that provide guidance for organisations not captured within the classifications of this concordat.

### **Points related to the specific commitments**

#### *Maintaining the highest standards of research integrity*

9. The draft concordat states that employers of researchers are responsible for, 'demonstrating that they have procedures in place to ensure that research is conducted in accordance with the standards of best practice; systems to promote research integrity; and transparent, robust and fair processes to investigate alleged research misconduct.' As higher education institutions (HEIs) will be expected to report on their own adherence to the concordat it would be beneficial at this point to clarify where these common 'standards of best practice' are defined.

#### *Ethical, legal and professional frameworks*

10. The draft concordat states that funders of research will 'only provide funding to organisations that can demonstrate that appropriate structures are in place to ensure research integrity in their research activities.' Funders are unlikely to be able to police this at an individual institutional level. At a system level, the implication could be that organisations that are not signatories of the concordat should not be eligible to receive funding. However, organisations may not sign up to the concordat for reasons not related to negligence (i.e. they are based outside the UK). Consequently, clarification is required on how this be applied in practice in a manner that is proportionate.

#### *Embedding a culture of research integrity*

11. The draft concordat states that employers of researchers will 'participate in an annual monitoring exercise to demonstrate that the institution has met the commitments of the concordat.' It is understood that this will be a self-assessment exercise by the employing institution. It would be beneficial to clarify the nature of this exercise, including any repercussions of non-compliance, in the final concordat.
12. Employers of researchers have a responsibility to provide training to support the 'embedding of a culture of research integrity'. This should be made explicit within the concordat.
13. The responsibilities of funders of research include to 'promote adoption of the concordat within the research community.' It would be beneficial for the concordat to clarify what is meant by this in practice.
14. This commitment currently includes no responsibilities for researchers. It would be beneficial to include a general statement that acknowledges that they too have a responsibility for contributing to a research environment that promotes integrity in research.

#### *Dealing with allegations of research misconduct*

15. The responsibility of employers of researchers to 'take reasonable steps to safeguard the reputation of individuals who are exonerated' should be framed in the concordat within an explicit statement that the starting assumption in dealing with allegations of research misconduct is one of innocence until can be demonstrated otherwise.
16. In some cases of improper research practice, the individual concerned is now employed at a different organisation to the one where alleged misconduct took place. In the case of such instances, it would be beneficial for the concordat to clarify the respective responsibilities of the different organisations concerned.
17. Funders of research currently have different requirements concerning the reporting, investigation and penalties imposed for failing to adhere to the conditions of award. It may be beneficial for the concordat to promote greater consistency between organisations.

*A commitment to strengthening research integrity*

18. The draft concordat states that funders of research will, 'periodically review their processes and practices to ensure that they are not providing inappropriate incentives.' In the final concordat it would be beneficial if this language were consistent with the earlier duty to 'avoid disincentives' included in commitment three, 'embedding a culture of research integrity.' Additionally, for these points it may be beneficial to provide some practical examples for illustration.

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