The concordat to support research integrity
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Summary of commitments

This concordat seeks to provide a comprehensive national framework for good research conduct and its governance. As signatories to and supporters of the concordat to support research integrity, we are committed to:

- maintaining 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
- using transparent, robust and fair processes to deal with allegations of research misconduct should they arise
- working together to strengthen the integrity of research and to reviewing progress regularly and openly

Signatories to the concordat

Department for Employment and Learning
Higher Education Funding Council for England
Higher Education Funding Council for Wales
National Institute for Health Research
Research Councils UK
Scottish Funding Council
Universities UK
Wellcome Trust

An up-to-date list of supporters can be found on the Universities UK website, www.universitiesuk.ac.uk
The concordat to support research integrity

Foreword by the Minister for Universities and Science

Research and scholarship of all forms are worthwhile in themselves and critical to the future prosperity of the UK. Research and scholarship enrich our social and cultural life. A strong research base provides the foundation for economic growth and helps make us a more competitive nation. It drives innovation and improves public life. It provides benefits from which everyone gains – both in our own country and elsewhere.

This government recognises the importance of excellent research, and we are committed to ensuring that the UK remains one of the best places in the world for cutting edge research and innovation. We can be rightly proud of our achievements, and of the excellent reputation our researchers enjoy abroad. They are the most productive researchers of all the G8 economies. With 4% of the world’s researchers, we produce more than 6% of all research articles. This research attracts 11% of all citations including 14% of the most highly cited academic papers. We continue to punch above our weight.

If we are to maintain our position at the very forefront of research and scholarship, then we must be sure that the work of our research community is underpinned by common values of rigour, respect, and responsibility. Excellence and integrity are inextricably linked.

I do not doubt that our researchers understand their responsibilities and take them seriously. However, we must not be complacent. We must work together and be sure that we can show – both to the public and to our international partners and competitors – how the highest possible standards of integrity are maintained. We must be clear that there is openness, transparency and accountability where public funds are being used. We must be confident that the research community has the tools to deal with any alleged misconduct by researchers in a transparent, robust and fair manner.
I welcome the commitments that this concordat outlines. It demonstrates what researchers, their employers and the funders of research do to ensure the public has confidence that their work continues to uphold the highest standards. It also establishes, for the first time, a mechanism for major stakeholders to come together to review progress towards strengthening research integrity. And finally, the commitment to account for these developments in an open and transparent way provides real assurances that research and scholarship in the UK continues to be something of which we can be proud.

Rt. Hon. David Willetts MP
Minister for Universities and Science
The concordat to support research integrity

Foreword by the signatories to the concordat

We firmly believe in the quality of the research produced in the UK and in the integrity of our researchers. Universities and research funders have long worked together to support and promote research integrity and it is clear that we continue to have a vital role to play. This concordat provides an effective mechanism for us to work together and support future developments in this important area.

Research in the UK is already subject to rigorous safeguards, for example through research ethics processes, standards for professional practice, and wider legal obligations. Building on this, a shared commitment to supporting the production of research founded on rigour, integrity and excellence should remain an absolute priority. We must be able to demonstrate that we are taking our responsibilities seriously and that misconduct will be dealt with appropriately, while recognising that mistakes and honest errors can be made in any field of human endeavour.

This concordat recognises that the strength of UK research on the world stage is founded on researchers themselves; on the autonomy of our research establishments; on academic freedom; and on a competitive funding environment that rewards excellence. Any overarching approach to research integrity needs to work within these existing systems, acknowledging the complementary roles and responsibilities of all parties performing, funding or otherwise supporting research. We do not believe that the case has been made for introducing a new and additional regulatory mechanism for research, and we welcome the government’s support for the concordat as a means of strengthening research integrity through existing frameworks.

However, we do believe that there is a need to promote what we are doing more effectively, through greater openness and transparency, and to ensure we are adhering to consistently high standards across the research community. This includes what we do to embed our commitment to research integrity within institutional processes, through the training and practice of researchers and within the research environment, as well as what we do when things go wrong.

The concordat therefore recommends that institutions should make a public statement on these issues, and that the signatories to this concordat should produce an annual statement outlining what we, as a sector, have been doing to further strengthen the integrity of UK research. Representatives of the signatories and supporters of the concordat will convene a research integrity stakeholder forum to provide a focus for debates on research integrity.

Internationally there has been a renewed focus on research integrity. The Singapore Statement on Research Integrity (2010) outlined the core principles and responsibilities that should be common to all good research. Similarly, the European Code of Conduct for Research Integrity (2011) sets out a clear and useful framework.
We welcome and support the universal principles outlined in these documents and this concordat represents our commitment to provide the framework through which these statements can be articulated and understood in a UK context.

The research community is already doing much to ensure that the integrity of research and scholarship in the UK is beyond reproach. The concordat represents a chance to celebrate our achievements. But it must also be used as an opportunity to reflect on where we can improve.

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Introduction

This concordat will help to ensure that research produced by or in collaboration with the UK research community is underpinned by the highest standards of rigour and integrity.

All those engaged with research have a duty to consider how the work they undertake, host or support impacts on society and on the wider research community. Commitment to the principles set out in the concordat helps demonstrate to government, business, international partners and the wider public that they can continue to have confidence in the research we produce. It provides assurances of the standards expected of all stakeholders, identifying five commitments that all those engaged with research should be able to make.

By acting in accordance with the principles and commitments outlined in this concordat, the research community can demonstrate that they:

- underpin all of their work with common values of rigour and integrity
- conform to all ethical, legal and professional obligations incumbent on their work
- nurture a research environment that supports research of the highest standards of rigour and integrity
- use transparent, robust and fair processes to handle allegations of misconduct
- continue to monitor, and where necessary improve, the suitability and appropriateness of the mechanisms in place to provide assurances over the integrity of research
Following a similar process to that outlined in the *Singapore Statement on Research Integrity*, the concordat recognises the different responsibilities of researchers, employers of researchers and funders of research under each commitment. It also recognises the vital role that other organisations engaged with supporting research and researchers play in strengthening research integrity. These include professional, statutory and regulatory bodies; journals and publishers; academies and learned societies; representative bodies; and organisations that provide support and guidance such as the UK Research Integrity Office.

By outlining these commitments and responsibilities, the concordat helps stakeholders to understand clearly the roles they play in further strengthening the integrity of research.

The concordat:

• **Applies to all fields of research.** The highest standards of integrity are needed in all fields of research; the commitments outlined in the concordat are relevant to all disciplines in which research is undertaken.

• **Emphasises responsibilities and accountabilities.** The concordat supports a system of cooperation and identifies the different roles stakeholders play in supporting research integrity. It describes the responsibilities and accountabilities of each of the key participants – researchers, their employers, and funders of research – and acknowledges the important role of other organisations engaged with supporting research and researchers. The best way to ensure the integrity of research is for all those involved to acknowledge and discharge their specific responsibilities and to work together to maintain the highest standards.

• **Complements existing frameworks.** Extensive statutory and regulatory standards already exist to govern research practice where it is deemed necessary. The concordat does not supersede or replace these, but sets them – along with the general and discipline-specific codes, guidance and advice that are already available to support researchers – in a broader national framework. Similarly, conditions of grant from funding bodies will often be accompanied by specific guidelines that outline acceptable behaviour and expected conduct. These will change over time, and should be followed by researchers.

• **Recognises the autonomy of employers.** Employers of researchers are a diverse set of organisations that must have the freedom to strengthen policies and procedures relating to research as appropriate to their circumstances: there can be no ‘one size fits all’ approach. The concordat provides a flexible framework to help employers ensure that they are able to fully discharge their responsibilities and that they have the mechanisms in place to meet the highest standards.
Research, wherever it takes place, must be conducted according to the highest standards of rigour and integrity. The definition of research integrity used in this concordat draws on a number of existing definitions in a way that is applicable to all areas of research. The core elements are:

- **Honesty** in all aspects of research, including in the presentation of research goals, intentions and findings; in reporting on research methods and procedures; in gathering data; in using and acknowledging the work of other researchers; and in conveying valid interpretations and making justifiable claims based on research findings.

- **Rigour**, in line with prevailing disciplinary norms and standards: in performing research and using appropriate methods; in adhering to an agreed protocol where appropriate; in drawing interpretations and conclusions from the research; and in communicating the results.

- **Transparency and open communication** in declaring conflicts of interest; in the reporting of research data collection methods; in the analysis and interpretation of data; in making research findings widely available, which includes sharing negative results as appropriate; and in presenting the work to other researchers and to the general public.

- **Care and respect** for all participants in and subjects of research, including humans, animals, the environment and cultural objects. Those engaged with research must also show care and respect for the stewardship of research and scholarship for future generations.

These core elements of research integrity are the values through which trust and confidence in research stem, and from which the value and benefits of research flow. They 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 (that is, peer review).
Researchers must be able to exercise freedom in their academic choices, and must also accept responsibility for the decisions they make. Thus, the primary responsibility for ensuring that they act according to these principles in all aspects of their research work, including peer review, lies with the individual. Employers of researchers, funders of research and other organisations engaged with supporting research and researchers also have important roles to play.

Researchers will:

- understand the expected standards of rigour and integrity relevant to their research
- maintain the highest standards of rigour and integrity in their work at all times

Employers of researchers are responsible for:

- 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

Funders of research expect:

- 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

Where research is being conducted collaboratively, and particularly within interdisciplinary or international partnerships, there needs to be clear agreement on and articulation of the standards and frameworks that will apply to the work. The European Code of Conduct for Research Integrity provides helpful advice on this point.
Commitment #2:
We are committed to ensuring that research is conducted according to appropriate ethical, legal and professional frameworks, obligations and standards.

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 reduce the potential for harm, in particular to human participants, the environment, and animals involved in research. They identify societal concerns that researchers should acknowledge and determine the minimum standards to which all research must conform. Failure to comply with such frameworks may result in sanctions; where legal obligations are concerned, this could mean a criminal offence has been committed. Moreover, these frameworks are important in maintaining and enhancing public trust in research.

The frameworks that regulate research practice will change over time. Ethical concerns evolve and new legal obligations and professional standards are designated. There will, in many cases, be an international dimension. Therefore, it is not helpful to provide a single, definitive outline of the frameworks, standards and obligations to which research must conform. However, all parties have a responsibility to ensure they have up-to-date knowledge of those that apply to their work.

Other organisations engaged with supporting research and researchers, such as professional, statutory and regulatory bodies; academies and learned societies; and the UK Research Integrity Office, have considerable experience in developing professional codes of conduct, ethical frameworks and other guidelines that provide both general and discipline-specific guidance. Funders of research may also provide similar forms of guidance. Relevant and appropriate resources should be drawn on by researchers when they undertake research, and may also be of use to employers of researchers.

Funders of research may also refer to specific guidelines that must be adhered to as part of their conditions of grant. It is important that researchers are familiar with those guidelines required by the funder(s) of their own research and, where necessary, by their employers.

In line with the principles expressed in the Concordat to support the career development of researchers (2008), researchers ‘share the responsibility for and need to pro-actively engage in their own personal and career development, and lifelong learning’. This will include recognition of changing ethical, legal and professional obligations.
Researchers will also:
• ensure that all research is subject to active and appropriate consideration of ethical issues
• comply with ethical, legal and professional frameworks, obligations and standards as required by statutory and regulatory authorities, and by employers, funders and other relevant stakeholders

Employers of researchers are responsible for:
• 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 researchers can access advice and guidance on ethical, legal and professional obligations and standards

Funders of research will expect researchers and employers of researchers who receive funding to conform to the ethical, legal and professional standards relevant to their research; this includes any specific codes of practice, legal requirements and other policies that the funder identifies as part of their conditions of grant.

To support researchers and employers of researchers, funders of research will:
• 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

Other organisations working to support research and researchers should continue with their efforts to further strengthen the integrity of research. In particular, the work of organisations to develop recognised ethical guidelines and codes of conduct for different research disciplines is invaluable. Collaboration between organisations should be encouraged in order to develop guidance relevant to interdisciplinary research and to help disseminate learning and good practice.
Embedding a culture of research integrity

COMMITMENT #3:
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.

Maintaining the highest standards in research requires the right environment. It is the responsibility of employers of researchers – and all those undertaking, supporting or otherwise engaged with research – to maintain a culture that nurtures good practice. This includes universities, research institutes, funders of research, professional and representative bodies, and organisations with a regulatory role.

A research environment that helps to develop good research practice and embeds a culture of research integrity should, as a minimum, include:

• clear policies, practices and procedures to support researchers
• suitable learning, training and mentoring opportunities to support the development of researchers
• robust management systems to ensure that policies relating to research, research integrity and researcher behaviour are implemented
• awareness among researchers of the standards and behaviours that are expected of them
• systems within the research environment that identify potential concerns at an early stage and mechanisms for providing support to researchers in need of assistance

There should also be no stigma attached to researchers who find that they are in need of assistance from their employers. Most employers of researchers will recognise the above features in their own research environment. However, there should also be mechanisms in place to embed the core features of a research environment that nurtures good research practice and a culture of research integrity, and for periodically reflecting on whether they remain fit for purpose. The concordat should act as a tool for stimulating this reflection.
As already stated, the *Concordat to support the career development of researchers* emphasised that researchers should take a proactive role in their own personal development. Embracing this responsibility plays an important part in nurturing a culture of research integrity.

**Employers of researchers** will:

- 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

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.

Other organisations engaged with supporting research and researchers will have considerable experience in assisting researchers and employers to develop and sustain a culture of research integrity. Researchers and employers of researchers should consider how they might best use these sources of help.

**Funders of research** are responsible for:

- promoting adoption of the concordat within the research community
- supporting the implementation of the concordat through shared guidance, policies and plans

Funders of research could encourage adoption of the concordat by associating it with their conditions of grant.
Dealing with allegations of research misconduct

**COMMITMENT #4:**
We are committed to using transparent, robust and fair processes to deal with allegations of research misconduct should they arise.

Research misconduct is characterised as behaviour or actions that fall short of the standards of ethics, research and scholarship required to ensure that the integrity of research is upheld. It is a problem because it can cause harm (for example to patients, the public and the environment), damages the credibility of research, undermines the research record, and wastes resources.

The concordat recognises that academic freedom is fundamental to the production of excellent research. This means that responsibility for ensuring that no misconduct occurs rests primarily with individual researchers. However, both employers of researchers and funders of research have an active role to play in sustaining research integrity. For example, failing to deal with allegations of misconduct appropriately and refusing to publish negative research findings would be equally harmful to the reputation and quality of UK research, and to the research record.

Research misconduct can take many forms, including:

- **fabrication**: making up results or other outputs (eg, artefacts) and presenting them as if they were real
- **falsification**: manipulating research processes or changing or omitting data without good cause
- **plagiarism**: using other people’s material without giving proper credit
- **failure to meet ethical, legal and professional obligations**: for example failure to declare competing interests; misrepresentation of involvement or authorship; misrepresentation of interests; breach of confidentiality; lack of informed consent; misuse of personal data; and abuse of research subjects or materials
- **improper dealing with allegations of misconduct**: failing to address possible infringements such as attempts to cover up misconduct and reprisals against whistleblowers
This list is not intended to be exhaustive. Honest errors and differences in, for example, research methodology and interpretations are not examples of research misconduct.

It is imperative that when an allegation of research misconduct arises suitable procedures are in place to deal with it effectively and fairly. Employers have a duty of care to the researchers they employ, and there needs to be appropriate protection for the rights and interests of all parties. There must be accountability when things go wrong and, where concerns are upheld, appropriate action must be taken.

Employers of researchers have the primary responsibility for investigating allegations of research misconduct. It is the responsibility of employers to ensure that any person involved in investigating such allegations has the appropriate knowledge, skills, experience and authority to do so.

Employers of researchers are also responsible for taking appropriate steps to remedy any situations arising from 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. Employers should also be mindful that minor infractions, where there is no evident intention to deceive, may often be addressed informally through mentoring, education and guidance.

Researchers will:

• act in good faith with regard to allegations of research misconduct, whether in making allegations or in being required to participate in an investigation
• handle potential instances of research misconduct in an appropriate manner; this includes reporting misconduct to employers, funders and professional, statutory and regulatory bodies as circumstances require
As part of existing mechanisms and conditions of grant, employers of researchers should already:

- 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 (see Annexe II)
- 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.

Funders of research will:

- have clear expectations of what constitutes research misconduct
- ensure that recipients of funding are aware of requirements regarding the investigation and reporting of research misconduct, and that these are openly stated

Other organisations may be able to offer advice, guidance and practical assistance to all those involved with handling allegations of research misconduct. Annexe II identifies some resources that can help organisations ensure that systems for handling allegations of misconduct are effective.
A commitment to strengthening research integrity

COMMITMENT #5:
We are committed to working together to strengthen the integrity of research and to reviewing progress regularly and openly.

All signatories to the concordat are committed to the ongoing development of a culture that supports and nurtures research integrity, and mechanisms that provide assurances and, when things go wrong, ensure appropriate investigation and action are forthcoming. This will be an ongoing process, and one that will ensure that the sector has the people, systems and procedures to meet the evolving demands of providing assurance of the integrity of UK research. Importantly, we must be able to account for our efforts in an open and transparent way.

Employers of researchers already take steps to ensure that their environment promotes and nurtures a commitment to research integrity, and that suitable processes are in place to deal with misconduct. It is important that these efforts continue to be suitable and that they are communicated more effectively, and that the same high standards apply to all. The concordat therefore recommends that employers of researchers should present a short annual statement to their own governing body that:

- provides 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)
- provides assurances that the processes they have in place for dealing with allegations of misconduct are transparent, robust and fair, and that they continue to be appropriate to the needs of the organisation
- provides a high-level statement on any formal investigations of research misconduct that have been undertaken

To improve accountability, and provide assurances that measures being taken continue to support consistently high standards of research integrity, this statement should be made publicly available.
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’. Likewise, funders of research will periodically review their policies, grant conditions and processes.

As well as being more open about activities to further strengthen the integrity of research at the level of the employer, there needs to be a coordinated approach at the sector level to account for progress and to provide assurance on developments. Funders of research, employers of researchers and other organisations recognising the concordat should work together to produce an annual narrative statement on research integrity. This statement should be based on input from the signatories to the concordat.

To provide assurance over efforts to strengthen research integrity, Research Councils UK will use its existing assurance mechanisms to garner feedback on activity across the sector. This information will be made available to other funders and provide an evidence base for the annual statement, thereby reducing the need for additional reporting requirements.

Finally, it is important that those involved with embedding the concordat are able to learn from each other and disseminate good practice more widely. The concordat recommends that representatives of its signatories and supporters should convene an annual research integrity forum to assess progress and to draw out lessons for the sector as a whole.
Annexe I: Definitions

Research: Drawing on the UK funding bodies’ definition used in the Research Excellence Framework, as described in Assessment framework and guidance on submissions (2011), ‘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’.

Researchers: Following the UK Research Integrity Office Code of practice for research (2009), ‘researchers’ are defined as any people who conduct research, including but not limited to: as an employee; as an independent contractor or consultant; as a research student; as a visiting or emeritus member of staff; or as a member of staff on a joint clinical or honorary contract.

Employers of researchers: Drawing on the UK Research Integrity Office Code of practice for research (2009), a broad definition of ‘employer’ is used. ‘Employers of researchers’ are any bodies which: conduct or host research; employ, support or host researchers; teach research students; or allow research to be carried out under their auspices.

Funders of research: These may be in the public, charity or private sector. Funders may also be employers of researchers, and they may also commission research. The definition includes organisations that provide financial sponsorship for research and/or researchers.

Other organisations: A diverse range of other organisations are involved with supporting the integrity of research. ‘Other organisations’ engaged with supporting research and researchers include: professional, statutory and regulatory bodies; academies and learned societies; professional and subject-specific representative bodies; journals and publishers; and organisations offering advice, guidance and support, such as the UK Research Integrity Office and the Improving Dispute Resolution Advisory Service for Further and Higher Education.
Annexe II: Some useful resources

**Singapore Statement on Research Integrity**
*Singapore Statement on Research Integrity*
http://www.singaporestatement.org/

**European Science Foundation (www.esf.org)**
*European Code of Conduct for Research Integrity*
http://www.esf.org/activities/mo-fora/research-integrity.html

**Government Office for Science (www.bis.gov.uk/go-science)**
*Rigour, Respect, Responsibility: a Universal Ethical Code for Scientists*
http://www.bis.gov.uk/assets/goscience/docs/u/universal-ethical-code-scientists.pdf

**Improving Dispute Resolution Advisory Service for Further and Higher Education (www.idras.ac.uk)**
*Advice for institutions*
http://www.idras.ac.uk/institutions/
*Advice for individuals*
http://www.idras.ac.uk/individuals/

**Research Councils UK (www.rcuk.ac.uk)**
*Integrity, clarity and good management: Research Councils UK Policy and Code of Conduct on the Governance of Good Research*
http://www.rcuk.ac.uk/documents/reviews/grc/goodresearchconductcode.pdf

**UK Research Integrity Office (www.ukrio.org)**
*Code of Practice for Research: Promoting good practice and preventing misconduct*
http://www.ukrio.org/what-we-do/code-of-practice-for-research/

*Procedure for the Investigation of Misconduct in Research*
Annexe III:
The concordat working group

The concordat was developed between July 2011 and July 2012 by a working group that represented universities, government departments and the major funders of UK research. The working group met four times.

Other stakeholders were invited to comment on the development of the concordat in April and May 2012. This feedback proved to be invaluable. The working group would like to extend their thanks to all those who were able to participate.

We would also like to thank Chloë Somers and Dr Marc Taylor for their participation in the concordat working group to September 2011.

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