

University of Sussex

Consultation on The Concordat to Support Research Integrity

10 May 2012

A. Introduction

1. This response is made on behalf of the University of Sussex.
2. We are pleased to have the opportunity to comment on the draft Concordat.
3. The University wishes to achieve and maintain the highest levels of research integrity, and hence supports the desire to enable and embed a suitable framework and set of standards.

B. General Comments

4. At first sight, there is little to disagree with in terms of principles. However, we are concerned to understand the purpose of the proposed Concordat over and above what already exists, in particular the policies of individual organisations, but also the guidance provided by bodies such as UKRIO and subject associations such as the British Psychological Society. Equally, we are concerned as to the practical implementation of the Concordat.
5. We are also concerned that there is an implication of substantive issues needing to be addressed, and yet there is no evidence provided of the situation or of specific concerns. One or two high profile cases in other countries do not make a crisis in the UK. Equally, that there is likely to be a substantial level of less than good practice does not mean that this represents bad practice, per se. And the means to address that less good practice should be by developmental rather than regulatory means. To use a manufacturing analogy, one cannot inspect in quality at the end of the process.
6. The relationship of the Concordat to other mechanisms for promotion or regulation of research integrity is not clear, and not addressed. There is a danger that the sector would be subject to multiple overlapping, potentially competing requirements, which would make the delivery of research integrity less rather than more likely.
7. There is a real danger that the Concordat would subsequently lead to excessive regulation, at a cost to research institutions and to research itself. The proposals imply new requirements for training, review, monitoring, enforcement, and reporting yet we are unaware of any additional resource being made available to support implementation of the Concordat.
8. Furthermore, the Concordat would represent a burden on parts of the research sector, whereas other elements, e.g. commercial competitors, would not be subject to it. That would add to the challenge of generating research funding in, for example, policy-related areas commissioned by the Government, unless the latter made it a requirement of all of their funded research.
9. The draft Concordat places most onus on the employers of researchers, and very little on funders. If the consequences of the introduction of such a Concordat are an increase in the indirect costs of research, will the funders of research recognise their responsibilities towards those increases (including those who do not contribute to

meeting those costs)? In the context of the post-Wakeham requirement to reduce institutional indirect costs, this does not sit well.

10. We would wish to see more specific and direct actions on the part of the funders and regulators of research, as they are in part responsible for the inherent structures (in particular the funding mechanisms) that can lead individuals to operate in inappropriate ways. Would the funders, preferably collectively, run research integrity training on which all funded investigators, researchers (including research students) be required to attend? That way they could support the enhancement of awareness, assure themselves of the standards of training and of attendance, and control the costs of implementation.
11. There are also obligations placed on individual researchers. It is not at all clear how these would be exercised / enforced, other than through their employer, which places another burden on the latter. Professional bodies may not be an appropriate route in this respect, because there are not necessarily relevant bodies for all areas of research activity, and not all researchers are members of a relevant body where it exists: there is no Chartered Researcher or certificate to practice that could be removed, for example.
12. Whilst understanding the desire to seek a single framework that covers all disciplines, there is equally a danger that such a framework may tend towards accommodating particular disciplinary features, and hence creates an inappropriate requirement and burden on other areas of activity.

C. Specific Comments

13. The comment at the end of page 11 that funders can encourage adoption of the Concordat by making it a condition of grant illustrates the fundamental problem. This would be enforcing the Concordat, not encouraging it. It also implies a monitoring process; how would the funders, collectively, envision this happening? What are the precise standards to which an institution would be held, because presumably not meeting the condition would make an institution ineligible to apply for funds from a given body.
14. This issue is continued on page 15, with funders having a responsibility to produce an annual statement. This implies an annual return from institutions, in order to provide information for the statement. This entails a burden on both funders and institutions. How much will this cost?
15. The following sections respond specifically to the areas identified in the consultation document.

C.1 The Concordat and PSRBs, professional and learned societies and other organisations

16. Professional and learned societies have important roles in determining and setting standards within their own areas of activity. This can provide for some lively debate when considering a given project because of understandable variations in approach, methodology, etc. Such differences occur within cognate subject groups, not just between disparate groups. Rather than expecting societies to undertake responsibilities under specific commitments in the Concordat, they should be engaged to develop relevant guidance.

C.2 Recognising the Concordat

17. The question about levels of recognition is inappropriate at this point. Speaking for Sussex, we would not be able to sign up to or recognise the Concordat in its current form at any level.

C.3 Emerging Fields, New Technologies and Interdisciplinary Research

18. The Concordat is not articulated at a subject level, and hence should not need to address new and emerging fields. The language of this question reinforces the view that this is intended to be regulation at a detailed level. Issues arising from new forms of research should be addressed by the relevant professional societies and by individual institutions undertaking such work, with guidance from independent bodies such as UKRIO.

C.4 Implementing the Concordat

19. It is inappropriate to determine implementation as we do not support the Concordat in its current form. We believe that the proponents / architects of the Concordat should take a step back and generate the evidence of the need for a Concordat, determine the broader / environmental changes that are required to effect a remedy to the problems identified, and fully cost and determine the funding for any proposed training or development environment.

D. Conclusions

20. In its current form, we could not support the Concordat.
21. We believe that the Concordat should be refocused to concentrate on the promotion of sectoral and organisational environments that create effective research environments, rather than the current emphasis on institutional and individual regulation.
22. We agree with the UKRIO statement, "As Michael Farthing, our higher education Vice-Chair, said at a high-level meeting on research misconduct earlier this year, we should keep a sense of perspective. The UK has a well-earned reputation for excellent and innovative research and for producing high-calibre researchers. Our research is not rife with fraud or misrepresentation but there is no room for complacency. UKRIO's role is not to add further burdens to institutions and their researchers. What we do is help sustain and enhance the strong professional ethos which, thankfully, drives most research here."

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