Summary of responses to ‘Research integrity concordat: Consultation on proposed implementation from 2013-14’ and policy decisions
July 2013

1. We received 78 responses to the consultation\(^1\). These included responses from 59 higher education institutions (HEIs), a number of organisations (including Universities UK, GuildHE, the Russell Group, the British Medical Association, the Universities and Colleges Union, the UK Research Integrity Office and the Association of Research Managers and Administrators), as well as a few individual respondents.

2. The majority of respondents supported the proposals as set out in two consultation questions, including a number of representative organisations and some with a direct interest in research integrity, such as the UK Research Integrity Office. Around half of all respondents expressed support of or commitment to the principles of research integrity, often directly endorsing the Concordat to support research integrity, and sometimes outlining their own existing processes for ensuring integrity\(^2\).

3. The consultation questions with response percentages are shown below.

**Question 1. Do you agree that compliance with the research integrity concordat should be a condition of HEFCE grant?**

<table>
<thead>
<tr>
<th>Response</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Strongly agree</td>
<td>27%</td>
</tr>
<tr>
<td>Agree</td>
<td>55%</td>
</tr>
<tr>
<td>Neither agree or disagree</td>
<td>6%</td>
</tr>
<tr>
<td>Disagree</td>
<td>5%</td>
</tr>
<tr>
<td>Strongly disagree</td>
<td>6%</td>
</tr>
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**Question 2. Do you agree with the proposal that demonstrating compliance with the research integrity concordat should be integrated into the HEFCE’s existing reporting requirements, and that this represents a proportionate and reasonable way to ensure compliance?**

<table>
<thead>
<tr>
<th>Response</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Strongly agree</td>
<td>23%</td>
</tr>
<tr>
<td>Agree</td>
<td>67%</td>
</tr>
<tr>
<td>Neither agree or disagree</td>
<td>3%</td>
</tr>
<tr>
<td>Disagree</td>
<td>3%</td>
</tr>
<tr>
<td>Strongly disagree</td>
<td>5%</td>
</tr>
</tbody>
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\(^1\) ‘Research integrity concordat: Consultation on proposed implementation from 2013-14’ (HEFCE 2012/32), available online at [http://www.hefce.ac.uk/pubs/year/2012/201232/](http://www.hefce.ac.uk/pubs/year/2012/201232/)

\(^2\) ‘Concordat to support research integrity’ (June 2012)\(^2\), available online at [http://www.universitiesuk.ac.uk/highereducation/Pages/Theconcordattosupportresearchintegrity.aspx](http://www.universitiesuk.ac.uk/highereducation/Pages/Theconcordattosupportresearchintegrity.aspx)
4. Responses from HEIs reflect these overall totals, with 79 per cent of responses to Question 1 in the ‘agree’ and ‘strongly agree’ categories, including the majority from research-intensive HEIs; an overwhelming majority of 90 per cent were in these categories for Question 2. A slightly higher 14 per cent of HEIs were in the ‘disagree’ and ‘strongly disagree’ categories for Question 1, with the remainder neither agreeing nor disagreeing.

5. Three key concerns were expressed by the small number of respondents in disagreement with the proposals: about additional burden, particularly from the introduction of multiple reporting requirements by different funders; about HEFCE’s remit in monitoring compliance with the Concordat; and about a lack of clarity regarding compliance with the general principles in the Concordat. These issues are covered in more detail under the analysis of the comments made in response to the above questions.

Analysis of comments

6. Reasons that arose multiple times for agreement with the proposals included a recognition that they would underline the significance of the Concordat, and research integrity more widely, further embedding these principles in HEIs and enabling greater confidence in UK research. A number of respondents directly expressed support for the proposals over the alternatives of establishing a national body to oversee research integrity, or introducing another administrative mechanism. A few noted the appropriateness of the proposals in view of the level of and degree of accountability for the public funds administered by HEFCE.

7. As outlined above, the majority of respondents supported the proposals, sometimes agreeing without additional comment. However, a significant number of respondents raised issues for further consideration, a number of which were common to those agreeing and those not.

   a. **Level of detail for compliance:** A significant number of respondents expressed a need for more detail on how terms such as ‘misconduct’ would be defined, and how compliance would be monitored through existing mechanisms. This concern (especially as expressed by those disagreeing with the proposals) often related to the nature of the Concordat in setting out general principles, thus making compliance and its demonstration difficult in practice. A number of HEIs sought clarification of the requirements, with some respondents, including the Russell Group, recommending that assurance be demonstrated through the annual monitoring statement, rather than through the assurance statement regarding compliance with the financial memorandum. A few respondents sought further detail about the definitions and procedures relating to sanctions.

   b. **Burden and multiple reporting:** A significant number of respondents raised concerns relating to the additional burden of demonstrating compliance. Around a third of these, including the Russell Group and the British Medical Association, agreed that the proposed monitoring arrangements were proportionate, but added a caveat against developing of any more burdensome approach. A large proportion of respondents on this issue expressed concern about the burden of multiple reporting arrangements in the sector. A number of these, including several HEIs,
the Russell Group and the UK Research Integrity Office, hoped to see the
proposals become part of streamlined reporting arrangements. A very small
number of respondents in disagreement with the proposals felt that the additional
burden was disproportionate and would have cost implications for HEIs.

c. **Institutional autonomy:** A number of responses emphasised that research
integrity is the responsibility of the institution. Some of these respondents did not
view the proposals as contradictory to this principle. A very small number of
respondents felt that the proposal for HEFCE to monitor compliance was not within
the Council’s remit, sometimes taking the view that compliance should be
monitored by all the Concordat’s signatories.

d. **Timing:** A small number of HEIs, as well as the 1994 Group, raised
concerns that 2013-14 is too early to introduce compliance, as it will take time for
HEIs to ensure all the necessary processes and training are in place and
operational.

8. Additional points raised by a small number of respondents included the views: that
our attitude to introducing compliance should be to prefer support over sanction; that
demonstrating compliance should not become a box-ticking exercise; that compliance
with the Concordat should apply to all research organisations; and that self-reporting
would not allow malpractice at an institutional level to be reported.

**Policy decisions**

9. The analysis of consultation responses shows a broad base of support for
implementing the proposals as set out, with a few areas of detail for consideration.

a. The volume of responses concerned about, or seeking further clarification of,
the details of monitoring compliance illustrates the need for HEFCE’s future
communication of requirements to be clear as to what is required of HEIs, in terms
of complying and of demonstrating compliance.

b. There are practical obstacles to introducing a single approach for reporting,
and it is not within HEFCE’s remit to collect reporting information for funding other
than that administered by us. However, we aim to reduce the burden of reporting
requirements on the sector where possible, and the Concordat commits funders to
‘explore ways of streamlining requirements to reduce any duplication and
inconsistency’. We will therefore maintain dialogue with the signatories of the
Concordat, and other major funders of research, to consider co-ordinating reporting
arrangements as far as possible.

c. While only a minority of respondents indicated concerns about complying
with the Concordat within the timeframe set out, we have considered this issue to
ensure all HEIs are able to meet our funding conditions. It would not be appropriate
to delay implementation of this requirement, given the level of support received for
the proposals and in view of the message that delayed implementation might send
about current arrangements for ensuring research integrity. However, for the first
year only, HEFCE proposes to recognise through the wording of the compliance
statement that some HEIs will still be working towards full compliance.
10. In view of the outcomes of the consultation and our commitment to this issue, HEFCE will therefore introduce compliance with the Concordat as a condition of HEFCE grant for all institutions eligible to receive our research funding. The financial memorandum will be updated to reflect this, and institutions will be required to confirm in their annual assurance return that they comply with the Concordat.