TO: **BOARD OF GOVERNORS, 28 SEPTEMBER 2022**

FROM: PROFESSOR JOHN STRACHAN, PRO-VICE CHANCELLOR (RESEARCH & ENTERPRISE)

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DATE: 13 SEPTEMBER 2022

**APPROVED BY THE
VICE-CHANCELLOR:**

SUBJECT: **ANNUAL COMPLIANCE STATEMENT ON RESEARCH INTEGRITY AND ETHICS FOR 21/22 ACADEMIC YEAR**

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1   PURPOSE & RECOMMENDATION

1.1   **The Board of Governors is asked to: APPROVE** the Annual Compliance Statement for the Concordat to Support Research Integrity for the 2021/22 academic year for submission to Universities UK. The annual report will be published on the University's website, in line with compliance requirements.

2   SUMMARY

2.1   The University Research Ethics Committee (REC) and the University Ethics Panel (UEP) have taken a number of actions and activities during the 2021/22 academic year to support and strengthen understanding of research integrity issues, details of which can be found in the draft Annual Compliance Statement attached as **Appendix A.**

2.2   In line with regulatory requirements, Governors are now asked to confirm the University's compliance with the Concordat as set out in Appendix A and approve the report for submission to the Universities UK for review, and for publication on the University website.

2.3   In light of feedback from the 2020/21 report, an update on completions of mandatory research integrity training has been included in the 2021/22 report.

2.4   Appendix A has been reviewed, revised, and approved by the University Ethics Panel (UEP), and the Research & Ethics Committee (REC) and now asks for approval from the Board of Governors.

3   BACKGROUND

3.1   On 11 July 2012, Universities UK (UUK) published a concordat to support research integrity. This was developed in collaboration with the Higher Education Funding Council for England

(HEFCE), Research Councils UK, the Wellcome Trust and Government, and in consultation with higher education institutions (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 requirement for an annual assurance statement was introduced as a condition of the HEFCE grant from 2013/14, for institutions eligible to receive Research England funding for research. Governors have previously approved a report on compliance by Bath Spa University for 2014/15, 2015/16, 2016/17, 2017/18, 2018/19, 2019/20, and 2020/21. These reports are publicly available on the University's website: https://www.bathspa.ac.uk/research-and-enterprise/research-strategy/integrity-and-ethics/

3.3 The core principles of the Concordat are as follows:

- All those engaged with research have a duty to consider how the work they undertake, host or support impacts on the research community and on wider society.
- HEIs should maintain the highest standards of research integrity through the following core commitments:

3.4 HEIs should maintain the highest standards of research integrity through the following core commitments:
- Upholding 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.
- Committed to using transparent, timely, robust and fair processes to deal with allegations of research misconduct when they arise.
- Committed to working together to strengthen the integrity of research and to reviewing progress regularly and openly.

3.5 UUK has undertaken a review of the Concordat to Support Research Integrity, and sector wide mechanisms to confirm compliance with the Concordat to Support Research Integrity and the related function of the Research Integrity Committee are still in development. Key recommendations include the following requirements for HEIs in relation to compliance for both UKRI funded research projects, and for the hypothecated use of Higher Education Quality Research (HEQR) grant funding.

3.6 It is a condition of grant for all higher education providers eligible to receive research funding administered through Research England to have in place procedures for governing good research practice, and for investigating and reporting unacceptable research conduct, that meets the requirements set out in the Concordat to Support Research Integrity and UKRI Policy and Standards. UKRI will assess compliance with this condition on an ongoing basis.

3.7 Research England expects higher education providers to notify them promptly of research misconduct which could reasonably be considered to be directly or indirectly supported by our funding. Higher education providers are expected to notify Research England when an

allegation is referred for formal investigation, and the outcome of any formal investigations of research misconduct.

3.8 The University Ethics Panel (UEP) regularly reviews our policies and procedures relating to Research Integrity and Ethics, to ensure continued compliance with the Concordat, and to align (where appropriate) with sector wise recommendations and guidance in this area, alongside funding body requirements. An Action Plan for compliance with the Concordat has been put in place and progress against actions is monitored by the University Ethics Panel, for reporting to the University Research & Ethics Committee (REC)

3.9 Bath Spa University has consistently reviewed compliance with the concordat on an annual basis as originally required by HEFCE from the 2014/15 academic year, and these reports are publicly available on the University's website here: https://www.bathspa.ac.uk/research-and-enterprise/research-strategy/integrity-and-ethics/

3.10 Compliance is now required by Universities UK (UUK), and monitored by a new UK Committee on Research Integrity (UK CORI), hosted by UKRI.

4 DISCUSSION

4.1 Governors are asked to note the report attached, and the ongoing development that has been undertaken across the University to ensure that we comply with the Concordat to Support Research Integrity.

4.2 Governors are asked to note that the Research Ethics Committee (REC) 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. An ongoing review of our ethical policies and procedures is part of this process.

5 RISK

5.1 As set out 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 non-payment of the Research England grant in 2023/24

6 CONCLUSION

6.1 It is recommended that The Board of Governors approves the submission of the Annual Compliance Statement to UUK in order to meet regulatory requirements, and for publication of the report on the University's website.

Appendices

- **Appendix A** – **Annual Compliance Statement for the Concordat to Support Research Integrity 2021/22**

APPENDIX A - Compliance of Bath Spa University with the Concordat to Support Research Integrity – September 2022 report to Governors

Introduction

The [UUK Concordat to Support Research Integrity](#) requires 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 revised Concordat was published in October 2019, providing the principles, commitments and standards which should be inherent in all good research. The revised Concordat represents a renewed ambition to strengthen research integrity, building on a shared commitment that research produced, or in collaboration with the UK research community, is underpinned by the highest standards of rigour, integrity and excellence.

The 2021/22 report for Bath Spa University has been collated by the Research Support Office (RSO) in consultation with Schools and approved by the University Ethics Panel (UEP) and noted by Research Ethics Committee (REC) in September 2022.

1. **Maintaining the highest standards of research integrity at Bath Spa University**

    1.1 The University's commitment and approach to the highest standards of research ethics and integrity is subject to ongoing evaluation and review through discussions at the University Ethics Panel (UEP) and reported through the Research Ethics Committee (REC) for oversight and approval of proposed developments.

    1.2 Throughout the 2021/22 academic year, we have continued to expand and develop our suite of online resources (launched during 2019/20) to support researchers to understand all aspects of Research Integrity, as well as to ensure that our resources, processes and lines of accountability continue to be transparent and encourage open dialogue and communication – including updated templates, contract lists, exemplars, guidance, and information to support our research community. This resource serves as a 'one stop shop' to detail clear policies, procedures, and contact points for ethical review and approval, as well as to communicate clear requirements and expectations in line with the commitments within the Concordat to all researchers. We have continued to add to these resources, including updated exemplars and external resources from training events such as those run by the UK Research and Innovation Office (UKRIO). We have also begun to collate FAQs during the year with the view to adding these as a resource during 2022/23, as well as in other guidance mediums such as course handbooks.

    1.3 The University continues to operate an Ethics Peer Review College (EPRC) within each academic unit, led by a designated School Ethics Lead who serves as School representative to the UEP and manages a team of reviewers within each academic unit. A focus noted in previous statements has been on embedding the role of School Ethics Lead as a local point of contact in each School, creating an access point for researchers for informal and formal engagement in Research Integrity matters, and ensuring that our research community are able to access appropriate advice and guidance on ethical issues and standards. The School Ethics Lead is then in turn able to ensure that key

emerging themes from such discussions can be escalated to the UEP for consideration and action within our wider institutional development planning. This work has continued apace during 2021/22 academic year, with many of our School Ethics Leads setting up informal drop-in sessions for researchers interested in matters of research integrity and ethics, enabling informal discussion with researchers on these issues and ironing out potential complexities early during project development. This was informed by good practice identified originally in one particular academic school last year, which demonstrates the cross-curricular nature of our UEP and how this enables sharing of best practice across disciplinary areas of the institution.

1.4   In order to continue to embed awareness of legal, ethical and professional frameworks, as well as data management issues in relation to research ethics and integrity, during 2021/22 the UEP has commenced a mapping to better understand where research practice sits within our Undergraduate and Postgraduate taught modules. This has enabled interventions to be put in place to ensure better consistency of practice across our academic schools, and embedded the School Ethics Lead as a local point of contact for module supervisors in planning and delivering inputs around matters of research integrity and ethics. This in turn has supported the upskilling of our wider academic teams, who have been better enabled to transfer knowledge around these matters to our student community whilst developing their research practice.

1.5   The UEP has also led an informal audit across current PGR students to assess their current ethical approval needs. This has engaged Supervisors in ensuring consistent support for ethical approval matters and acted as a further 'check-in' point during studies to encourage students to reflect on ethical approvals given pre-data collection and consider further development as their research progresses.

1.6   School Ethics Leads have utilised this work to inform course development meetings across their areas, ensuring that matters of research integrity, ethics and data management have become fully embedded within wider course development and strategy planning meetings.

2.   **Embedding a culture of research integrity at Bath Spa University**

a.   The University is committed to embedding an open culture of research integrity, and with the reorganisation of the University Ethics Panel and Ethics Peer Review College during 2019/20, 2021/22 has seen a focus on embedding and enhancing this new structure. During 2021/22 the UEP has led work to maintain and further develop a culture of transparency, open communication, and ongoing dialogue relating to research integrity and ethics matters. The appointment of School Ethics Leads in each academic unit has been transformative in moving this agenda forward, and we have refined leadership across different subject areas in-light of recent developments including a further restructure of our academic schools during 2021/22. We can already see a real change in practice across the University with ethical considerations being applied organically across our undergraduate and postgraduate programmes as well as PhD and staff research projects. To this end, during the 2021/22 academic year we have focused on creating supporting materials and guidance for PhD students to consider in-depth all of the ethical

considerations of their research upfront, including long-term usages of data – and crafted new guidance for handbooks that helps navigate PGRs through these processes through Q&As based on common questions, as well as tools for helping them to better think through the ethical dimensions of their research.

b. Since 2020/21, we have implemented a new online replacement for our previous Liquid Office-based process to streamline the initial screening process for research proposals, improve accessibility, and to enhance early identification of ethical issues to support upfront discussions around ethical approval needs. This enables staff and students to work through an online checklist to determine whether or not their research proposal requires full ethical review through School and University procedures. This revised online checklist process has been disseminated widely and is being used consistently by both academic staff and PhD students at the start of the research process. During 2021/22, we have further embedded this process within a 'one-stop-shop' intranet resource for all staff and students and utilised intelligence gained through ethical review to refine checklist questions in order for them to better capture nuance and detail.

c. During 2021/22, alongside our existing suite of training, we have introduced further in-person training opportunities through the Researcher Development Programme, as well as new face-to-face quick inductions to our Research Integrity and Ethics processes and resources as part of our 'Introduction to the Research Office' new starter induction workshop for all new members of staff. We have also designed and implemented a new 'Brief Introduction to Research Integrity and Ethics' session for new PhD registrants as part of their induction programme, better signposting further training, resources, and expectations around ethical review and approval. This initial engagement with new staff and students has proven fruitful during 2021/22, as it has enabled upfront dialog regarding ethical matters, which in turn has enabled beneficial one-to-one informal conversations regarding ethical matters by enabling informal channels of communication with the RSO.

d. The UEP has reviewed and updated handbook guidance to new PhD students to better signpost ethical processes, but also to better stimulate upfront and informal discussions around matters of research integrity and ethics with both their Supervisory teams and with wider contact points within the University, including School Ethics Leads and the RSO – developing our institutional culture to further enable upfront and open discussions prior to research commencing, but to also encourage further ongoing and open dialog of such matters during project delivery and beyond.

e. The Research Support Office has worked to develop toolkits and resources on the University intranet for different student groups and staff, supported by on-line resources which offer an introduction to research integrity available to the whole student community. This includes a fast-track ethical approval template for Undergraduate and Postgraduate Taught students, which was being trialled during the 2020/21 academic year but became embedded during 2021/22, as well as collated resources on the University intranet. The UEP has continued to monitor usage of this new fast-track process and made revisions in light of feedback from

students and staff during the 2021/22 academic year to better reflect their needs and to maximise impact.

f.   The University upgraded to the second edition of the suite of Epigeum's online Research Integrity Modules during 2020/21, which have been updated to better integrate the principles detailed in the revised Concordat to Support Research Integrity. The new, more user-friendly and accessible modules were launched during 2020/21, and provide comprehensive research integrity training that delivers robust and consistent training in responsible research conduct. In addition, the Modules determine best practice informing users of the key concepts of research integrity, for each discipline, identifying all steps of the research process from design to reporting, addressing the types of issues important to researchers going through the different stages of the research project. The revised training was launched for all new starters during 2020/21, and the UEP has started to deliver a refresher programme for all academic staff and students who have undertaken the previous version of this training. This work will continue into the 2022/23 academic year.

g.   Overall uptake on mandatory online Epigeum training amongst academic staff has remained an area of strength for BSU, with 92% of new academic starters who joined us during the 2021/22 academic year completing the training within their 6-month probationary period, demonstrating that reinforced messaging around the importance of completing this training as part of the induction checklist has been highly successful.

h.   A break down on overall completions by academic unit is below:

Academic School	% of academic completions
Bath Business School	91%
Bath School of Art, Film and Media	97%
Bath School of Design	89%
School of Education	100%
School of Writing, Publishing and the Humanities	95%
School of Sciences	90%
BSU Total	**94%**

i. Institutional compliance with mandatory training has steadily improved by 33% since tracking began in 2018/19 (2018/19 = 61%, 2019/20 = 93%, 2020/21 = 93%, 2021/22 = 94%), which demonstrates that the work of the UEP to better promote and target both new starters and existing staff encouraging them to upskill by completing this training has been successful.

j. The above table represents those who have completed the new version of the training as well as those who had completed the previous version of the training within the last two academic years. During 2022/23, a focus of the UEP will be on ensuring that those who have completed the prior version of this training have refreshed and updated their knowledge by completing the updated version of the course by the end of the academic year. This will be supported through new functionality that embeds access to the online modules through our Ultra platform, which is currently being set-up by IT colleagues and will enhance accessibility of the course across academic teams.

k. The UEP has focused during the 2021/22 academic year on embedding and aligning ethical approval processes with wider issues around Data Management – reinforcing the processes for Data Management Planning to ensure the process is run in parallel with ethical approval to ensure a seamless parallel process is followed in order for both technical and ethical matters to be considered hand-in-hand. This has enhanced our institutional culture of deep thinking around such matters, and an improved understanding of the linkages between these different aspects of research integrity.

l. The revised monitoring system put in place for the review of ethical approvals, discontinuing the previous Liquid Office-based process and centralised through the RSO, has become embedded and improved consistency between student and staff ethical approval applications during 2021/22 and summary data for the academic year is set out below: These figures include mandatory ethical screening for all research grant applications at the bid submission stage, to identify which projects should go forward for full ethical approval if the grant is awarded.

Stage 1 initial review process (Stage 1)

- 20 applications have been recorded as receiving ethical clearance with no need for further review, of which 7 were PGR students (first phase of project), and 13 were from Staff.

- 36 staff and 11 PhD student applications have been recorded as needing full ethical approval at School level

2.9 School level ethical review process (Stage 2)

- Bath School of Art, Film and Media

  o 2 staff applications were considered, 1 is still in progress, 1 is pending researcher revisions

  o 1 PhD application is still in progress.

- Bath School of Design

  o No staff applications were considered

  o No PhD applications were considered

- School of Sciences

  o 10 staff applications have been considered of which 7 have been approved, 2 are in progress, 1 is pending researcher revisions.

  o 3 PhD applications have been considered, of which 2 have been approved and 1 is in progress

- School of Education

- o 18 staff applications were considered, of which 13 were subsequently approved, 1 is on hold pending funding award, 3 are still under review, 1 was rejected after escalation to UEP.

- o 1 PhD application has been received, awaiting submission.

- School of Writing, Publishing and the Humanities

    - o 3 staff applications were considered, 3 of which were subsequently approved.

    - o No PhD applications have been received.

- Bath Business School

    - o 1 staff applications was considered, which was approved.

    - o 1 PhD student application was considered and is pending approval.

- Bath School of Music and Performing Arts

    - o 2 staff application were considered, 2 are pending review.

    - o 5 PhD student applications were considered, 3 were subsequently approved, and 2 are still under review

2.10 University level ethical review process

- 2 PhD applications have been considered by the University Ethics Panel, 2 were approved. 1 application was escalated to the UEP and was rejected.

- UEP has also considered and published policy and procedures relating to Retrospective Ethical Approval and considered next steps for further updating the Research Misconduct Policy during the 2022/23 academic year, feeding into the UKRIO consultation.

- The UEP has also considered revised Handbook guidance for both PhD students and Supervisors and is again reviewing this ahead of the 2022/23 academic year in collaboration with the Graduate College.

2.11 In line with Audit Committee recommendations, the University Ethics Panel continues to review compliance against the UUK Concordat, and an action plan has been put in place using the 2021/22 UKRIO and ARMA Audit Tool to address areas of further development, which is monitored on a regular basis as a standing agenda item of UEP.

3. <u>Dealing with allegations of research misconduct</u>

3.1 Processes for the reporting and investigating of allegations of research misconduct have been reviewed in line with the UK Research Integrity office (UKRIO) recommendations, and UKRI guidance. 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.

3.2   The University has not been made aware of any allegations of research misconduct during the 2021/22 academic year

3.3   The UEP has fed into the consultation on the UKRIO draft procedure for dealing with allegations of research misconduct, and processes for the reporting and investigation of allegations of research misconduct will undergo further review and development during the 2022/23 academic year to ensure continued compliance with the revised Concordat and to embed the revised process for dealing with allegations of misconduct from UKRIO.

4.   **Our commitment to strengthening research integrity**

4.1   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, which are disseminated via the RSO through staff communication channels. Useful materials gained from these workshops are shared institutionally via our intranet resources to widen access.

4.1.1   Dr Alastair Niven is an active external member of the University Ethics Panel (UEP), and Professor Jeremy Bradshaw serves as External Adviser to the Research Ethics Committee (REC) – both continuing to offer invaluable help and support, as well as external scrutiny to both panels. The UEP also regularly invites guest stakeholders to panel meetings as required to support the topic of discussion, including the BSU Impact Research Fellow, and subject specialists within individual academic units to support discussions and developments across particular disciplinary areas.

4.1.2   As part of the approved action plan against the UKRIO and ARMA audit tool, the University Ethics Panel is considering further ways in which to formalise the role of external stakeholder groups and representative bodies within the ethical review process. The UEP has this year engaged via the RSO with the Equality Steering Group and reached out to several potential 'External Advisers' who can informally work with the panel on an ad-hoc basis to support particular subject-based or policy related developments as appropriate.

4.1.4   The RSO regularly reviews policy relating to researchers and projects supported by particular funding bodies and disseminates this as appropriate across the academic community.

4.1.5   RSO and academic staff are supported to attend funder specific workshops and training in this area, and the intranet is continually being updated to make funder regulations, guidance, and example of good practice more widely available.

4.1.6   REC regularly reviews policy and procedures relating to Open Research and has an action plan to comply with the requirements of the Concordat on Open Research Data, to which the University has recently become a signatory.