



ROYAL  
ACADEMY OF  
**ENGINEERING**

## **Revised Concordat to Support Research Integrity: 2019 Consultation**

A Universities UK consultation

Submission from the Royal Academy of Engineering

April 2019

## Introduction

This document contains the Academy's response to the April 2019 consultation on the revised Concordat to Support Research Integrity, which was managed by Universities UK on behalf of the concordat signatories. The consultation questions can be found [here](#).

## Overview

1. The Academy agrees that the summary of commitments as set out within the draft concordat are clear.
2. A checklist of the expectations of each stakeholder would be a welcome component of the concordat.
3. The Academy's Research Programmes promote engineering excellence in the UK through the support of aspiring and world-leading talent. As a funder of excellence, in engineering talent development and research, and as a National Academy, the Academy seeks to demonstrate best practice in the delivery of its programmes. Therefore, the Academy is highly supportive of the concordat. The comments provided are on particular details, and focused on facilitating implementation, rather than questioning the content, structure or fundamental underpinnings of the concordat. They mainly focus on mentions of 'demonstrating' compliance or fulfilment of the requirements and what this would look like in practice for employers, and a desire for further details on the 'annual monitoring exercise to demonstrate that the institution has met the commitments of the concordat'. Additional materials or opportunities to share and align statements of what constitutes research misconduct in the context of the concordat could be useful. Similarly, guidance on what best practice would be when managing funding in the case of misconduct would be welcome.

## Section 1: Maintaining the highest standards of research integrity

4. The draft concordat identifies honesty, rigour, transparency and open communication, and care and respect, as the four core elements of research integrity. The Academy is supportive of these four core elements. These effectively highlight the breadth of what constitutes research integrity, and are applicable across all areas of research including engineering.
5. The Academy, along with the Engineering Council and a number of the professional engineering institutions, has created a Statement of Ethical Principles to which it believes all professional engineers, technicians, and related bodies should subscribe. The elements identified within the revised concordat broadly align with those related to integrity set out within this Statement of Ethical Principles. The current version was published in July 2017.<sup>1</sup>
6. The expectations in this section of the concordat were updated to clarify the different responsibilities of researchers, employers of researchers, and funders of research.
  - a. The Academy is in agreement that the expectations of the concordat are clear for researchers.
  - b. Within the requirements for employers of researchers, there is an expectation of 'demonstrating that they have procedures in place to ensure that research is conducted in accordance with standards of best practice'. It is unclear from the concordat as presented for consultation precisely what is required for employers to do in order to demonstrate compliance, and the Academy would welcome clarification or further

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<sup>1</sup> [Statement of Ethical Principles for the Engineering Profession](#), Engineering Council and Royal Academy of Engineering, 2017.

guidance on this. Is it solely in the form of reporting via the short annual statement? If not, who would this be to, what format would it take and what would the frequency be?

- c. The Academy is in agreement that the expectations of the concordat are clear for funders of research.
7. Regarding the revised expectations detailed within this section of the concordat, the Academy agrees that these are proportionate for researchers, employers of researchers, and funders of research.
8. The Academy is confident that it will be able to implement commitment one of the revised concordat: "*We are committed to upholding the highest standards of rigour and integrity in all aspects of research.*"

## **Section 2: Ethical, legal and professional frameworks**

9. The expectations in this section of the concordat were updated to clarify the different responsibilities of researchers, employers of researchers and funders of research.
  - a. The Academy is in agreement that the expectations of the concordat are clear for researchers.
  - b. Within the employers of researchers' requirements, it states that they must have policies in place, ensure researcher awareness, support researchers and have arrangements in place related to research integrity, but there is no responsibility to demonstrate fulfilment of these. This contrasts with the funder requirements, where it is outlined that funders must only provide funding to organisations that can demonstrate that appropriate structures are in place to ensure research integrity in their research activities. This misalignment of requirements could have the potential to cause problems, especially where funding is concerned. Clearer explanation or guidance on what it means for an organisation to 'demonstrate' compliance would be welcomed, as would aligning the language used in the employers of research and funder requirements.
10. Regarding whether the revised expectations within this section of the concordat are proportionate, the Academy agrees that this is the case for those outlined for researchers. However, as explained in 9.b, the misalignment of the language used appears to imply an imbalance in expectations for employers of research and funders, particularly regarding demonstrating fulfilment of responsibilities. Whether or not the revised expectations are proportionate relies not only on the language used, but also what 'demonstrating' fulfilment or compliance actually entails.
11. The Academy is confident that it will be able to implement commitment two of the revised concordat: "*We are committed to ensuring that research is conducted according to appropriate ethical, legal and professional frameworks, obligations and standards.*"

## **Section 3: Embedding a culture of research integrity**

12. The expectations in this section of the concordat were updated to clarify the different responsibilities of employers of researchers and funders of research.
  - a. Individual researchers are an integral component within the culture of any given sector, field or organisation, and employers of researchers and

funders are not, and cannot be, wholly responsible for shaping the culture. Even with policies, procedures and structures in place, participation and buy-in from researchers are essential in order for these to be effective and succeed. A statement on personal responsibility within this section of the concordat for researchers to reflect upon could be beneficial.

- b. The Academy does not agree that the expectations for employers of researchers are clear within this section of the concordat. For the 'annual monitoring exercise to demonstrate that the institution has met the commitments of the concordat' guidance or clarification on what this would entail would make the point clearer. Is this the same as the short annual statement that employers of researchers are expected to produce? If not, is this to be a low-burden exercise, or a high-burden exercise that could deter organisations from becoming signatories of the concordat?
  - c. The Academy is in agreement that the expectations of the concordat are clear for funders of research.
13. Regarding whether the revised expectations within this section of the concordat are proportionate, the Academy agrees that this is the case for those outlined for funders of research, but as per the answer to 12.b, clarification would be needed on the nature of the monitoring exercise in order to determine whether this expectation is proportionate for employers of research.
14. The Academy is confident that it will be able to implement commitment three of the revised concordat: *"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."*

#### **Section 4: Dealing with allegations of misconduct**

15. The expectations in this section of the concordat have been updated to clarify the different responsibilities of researchers, employers of researchers and funders of research.
- a. The Academy is in agreement that the expectations of the concordat are clear for researchers.
  - b. The Academy is in agreement that the expectations of the concordat are clear for employers of researchers.
  - c. The Academy does not agree that the expectations for funders of research are clear within this section of the concordat. Guidance on a funder-specific definition on research misconduct in the context of the concordat would be welcomed - this would help provide consistency and streamlining across funders. Sharing best practice and alignment where appropriate of what misconduct and appropriate management of funding mean within the context of the concordat would assist funders in complying efficiently and effectively with the responsibilities.
16. Regarding the revised expectations detailed within this section of the concordat, the Academy agrees that these are proportionate for researchers, employers of researchers, and funders of research.
17. The Academy is confident that it will be able to implement commitment four of the revised concordat: *"We are committed to using transparent, timely, robust and fair processes to deal with allegations of research misconduct when they arise."*

### **Section 5: A commitment to strengthening research integrity**

18. The expectations in this section of the concordat have been updated to clarify the different responsibilities of the of employers of researchers and funders of research.
  - a. As this section of the concordat specifically relates to an oversight role, of reviewing the progress of research integrity, it feels appropriate for there to be an absence of expectations for researchers. This contrasts to the answer to question 15, which relates to the embedding of a culture – researcher buy-in and awareness are valuable in that instance but are unlikely to add any value here.
  - b. The Academy is in agreement that the expectations of the concordat are clear for employers of researchers.
  - c. The Academy is in agreement that the expectations of the concordat are clear for funders of research.
19. Regarding the revised expectations detailed within this section of the concordat, the Academy agrees that these are proportionate for researchers, employers of researchers, and funders of research.
20. The Academy is confident that it will be able to implement commitment five of the revised concordat: *"We are committed to working together to strengthen the integrity of research and to reviewing progress regularly and openly."*

### **Implementation of the concordat's commitments**

21. If additional clarification on the points raised throughout this response was provided, implementation by the Academy could be achieved within 18 months through updated guidance for each cycle of grant calls. However, there could be downstream impacts on the Academy's ability to implement the commitments in a timely fashion if the time-burden proves substantial on employers of research.
22. The Academy would value a training session on research integrity, focused on the requirements set out in this concordat.
23. Regarding having a named lead contact for research integrity within the organisation, the Academy may welcome training for the individual identified for this position.
24. Aside from this, the majority of points the Academy has identified come in the form of clarifications and further guidance on particular points, as set out in the answers above. Opportunities to share best practice and understand what is required to comply would be very welcome.

### **Definitions**

25. The Academy agrees that definitions set out in Annexe I of the draft concordat are fit for purpose.