Russell Group written evidence to the House of Commons Science and Technology Select Committee inquiry on Research Integrity

1. Summary

- Russell Group universities take Research Integrity (RI) seriously and work continuously to support staff and students to maintain high RI standards.

- Our universities operate robust procedures, as and when they need to be activated, for investigating potential instances of research misconduct.

- The UK Concordat to Support Research Integrity provides an important impetus for universities to enhance existing efforts to support RI, review systems and processes and deliver new training and guidance. It also helps raise the profile of this issue and ensure high-level internal support for efforts.

- As universities vary in terms of research strategies and priorities, cultures and structures, a 'one-size-fits-all' approach to supporting RI is unlikely to be effective. The Concordat recognises this and notes employers of researchers "must have the flexibility to strengthen policies and procedures relating to research as appropriate to their circumstances"; such flexibility encourages institutions to be innovative in how they foster integrity.

- Supporting and encouraging a positive RI culture requires all stakeholders in the research lifecycle to collaborate. Enhanced dialogue between stakeholders will advance efforts to uphold an RI culture, given that they each have complementary roles but different responsibilities in ensuring high RI standards. The new Research Integrity Forum will be helpful in this respect.

- As the direction of UK research continues towards greater engagement with non-academic collaborators and increased international collaboration, it is important universities consider with their collaborators how RI will be addressed in different contexts, and thereby clarify responsibilities between individual and institutional collaborators.

- A positive emphasis on fostering rigorous, respectful, responsible research is more effective in nurturing and sustaining an RI research culture, than an emphasis on regulation. Experience from the US suggests a new regulatory body is unlikely to be effective in improving standards or decreasing instances of research misconduct and may encourage a focus solely on compliance and extreme examples of misconduct, rather than promoting a culture and environment that values RI.

- Allowing universities to maintain the flexibility to foster a culture incentivising high standards is preferable to any direct regulation, which would not be conducive to aiding long-term meaningful efforts to foster RI that are already showing signs of having a positive impact.

2. Introduction

2.1   The purpose of The Russell Group is to provide strategic direction, policy development and communications for 24 major research-intensive universities in the UK; we aim to ensure that policy development in a wide range of issues relating to higher education is underpinned by a robust evidence base and a commitment to civic responsibility, improving life chances, raising aspirations and contributing to economic prosperity and innovation.

2.2   We welcome the opportunity to provide evidence to this inquiry, which reflects the input from

the Russell Group Research Integrity Forum. This Forum was established in 2013 and is a network of the professionals with lead responsibility within their universities for supporting the efforts of their researcher communities to foster research integrity (also known as good practice in research or the responsible conduct of research).

2.3 Before and since the launch of the *UK Concordat to Support Research Integrity* Russell Group universities have made significant progress in promoting greater awareness and understanding, throughout their researcher communities, about the importance of upholding high RI standards. Fostering RI requires sustained effort as new staff and students are recruited, staff take on greater responsibilities, and as expectations about professional practice evolve. The Forum is well-placed, therefore, to highlight key lessons from the Russell Group's broad experiences to date in fostering RI, what works (or does not work) and what remains to be done.

3.   The extent of the RI problem

3.1 The recent POSTnote on Integrity on Research recognises that "Information about the extent to which bad practice takes place is limited, with most data giving estimates". In addition, the data does not span the full range of disciplines to give a broad picture across the research landscape. When considering incidences of research misconduct or the prevalence of questionable research practices (QRPs), this must be properly supported with robust evidence.

3.2 Russell Group universities remain vigilant about the need to foster RI and monitor the situation closely; presently we see no indications of large-scale or systematic problems at either the institutional or discipline levels. Further research would be needed to get a broader understanding of the nature and frequency of both research misconduct and QRPs to reach more informed conclusions about the full picture across the whole of the UK research system. Any research on RI should also encompass commercial organisations in the UK.

3.3 The Concordat on RI states that universities should publish annual statements of compliance with its terms, which should include high-level anonymised statements on any formal investigations of research misconduct that have been undertaken. All Russell Group universities have published statements on Research integrity on their websites – see **Annex A** for a list of web links.

3.4 Our universities continue to emphasise the positive benefits (e.g. rigor in design, method, communication, publication and impact; nurturing effective, open, respectful research environments; professionally developing new researchers and research leaders) and seek to prevent incidences of research misconduct.

3.5 Russell Group universities have a wide range of collaborative engagements with non-academic collaborators and significant international research collaborations. These kinds of partnerships will be enhanced through the new Industrial Strategy and initiatives such as the Global Challenges Research Fund. It is important for universities to extend dialogue about RI considerations with their collaborators to clarify responsibilities between individual and institutional collaborators and to stimulate disucssions with non-academic partners about responsible innovation.

3.6 The Global Challenges Research Fund, for example, presents a need for researchers to reflect on and plan early for how they will manage the generic and distinct RI challenges that can occur when undertaking research in developing countries, to ensure the research is carried out responsibly from design to post-project end.

4. RI culture and possible causes and drivers

4.1 The Nuffield Council on Bioethics' report *Review of the culture of research in the UK* (2014) is the most useful recent piece of work highlighting aspects of UK research culture which could affect RI and makes suggestions for how to address them (although this report dealt with a wider set of issues). The limited evidence base of research on RI in the UK means however that it is not possible to conclusively single out certain factors, over other factors, as the principal causes and drivers for continued instances of research misconduct or QRPs. The Nuffield report is useful in that it provides indications upon which further research should build.

4.2 Russell Group universities are contributing to sharing good practices at the international level. They are participating in international discussions about integrity and misconduct (for example at world conferences such as Amsterdam, May 2017) and are contributing to Horizon 2020 Science and Society projects (for example the PRINTEGER project[1]).

5. The effectiveness of controls/regulation (formal and informal)

5.1 The Progress Report on the UK Concordat, published in 2016, provides examples of universities' approaches, identifies next steps, and indicates that the Concordat's approach, with its emphasis on upholding principles and the importance of nurturing an RI culture, is proving to be effective.

5.2 When reflecting on the effectiveness of measures it is important to remember the multipurpose of fostering RI: to strengthen the rigor of individual projects and individual practice, the research culture and environment, and to prevent research misconduct. With these multi-purposes in mind it is important to note that fostering RI is a long-term undertaking and any approach to altering the culture of research must take this into consideration.

5.3 What works best is dependent on an institution's distinct culture so 'one-size-fits-all' approaches have limited effect. Interventions to foster RI (e.g. policies, training, mentoring, approaches to leadership, rewards and recognition systems) are effective when they resonate with local cultures. Universities' efforts to embed RI cultures are enabled because they retain flexibility to test which approaches work best, encouraging a mix of top down and bottom up interventions within an institution combined with adoption of good practices shared from other organisations. It is important that universities remain empowered to devote most of the resource which they allocate to fostering RI to upholding high standards and not have to unduly divert the resource to evidencing compliance with external regulation.

5.4 Efforts to strengthen RI must also not focus solely on the worst and rarer examples of serious misconduct. It is also important to address questionable research practices (QRPs), which covers a wide spectrum of issues. Russell Group universities' approaches to fostering RI include efforts to increase awareness about the nature and risk of QRPs and the need to prevent them. Drawing attention to QRPs as well as to the most serious types of misconduct is useful because researchers understand the greater likelihood, risk and effect of QRPs occurring.

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[1] https://printeger.eu/ - University of Bristol is a partner in the consortium working on this project helping to improve integrity policies of national and international research organisations and contributing to improving ethical awareness and reflection through the education of new generations of scientists with next generation educational tools.

5.5   'Research Integrity' is a term widely used by funders, publishers, policy makers and RI professionals, but whilst the core behaviours underpinning RI are recognised, and apply across all research disciplines, the term does not have a universal meaning. Each individual academic or researcher will perceive RI differently, largely based on the environment and/or discipline they work in. The issues arising in a particular research field will differ; some are subject to specific legal and regulatory frameworks. These factors impact on how an individual perceives RI and the concept only 'comes alive' for an individual when contextualised in the practices of a discipline.

5.6   A culture which places an emphasis on compliance with rules can be counterproductive as it may encourage people to do the minimum, just enough to comply, as opposed to incentivising people to strive to improve research behaviours and practices. It is more effective to nurture and sustain a culture that advocates for, encourages, recognises and rewards best research practices: a culture of integrity. Checks and balances need to remain proportionate.

5.7   The USA has taken a regulatory approach, creating the US Office of Research Integrity in 1992. Its focus remains narrow, concerned with falsification, fabrication and plagiarism. However, there is little reliable evidence to show whether the creation of the US Office has had an impact on improving standards, or decreasing the levels of misconduct in federally-funded research. The creation of a UK regulatory body to oversee compliance would run the risk of undoing the progress made in strengthening the rigor and culture of UK research, by discouraging transparency and undermining the credibility of positive messages.

5.8   **Allowing universities to maintain the flexibility to foster a culture incentivising high standards is preferable to any direct regulation, which would not be conducive to aiding long-term meaningful efforts to foster RI that are already showing signs of having a positive impact.** The fostering of RI should be a supportive pillar of institutional research strategies.

5.9   Funders can also play an important role in aiding universities' efforts to foster RI. The Wellcome Trust's expectation that universities establish independent ethics review procedures to govern research involving human participants, and RCUK's introduction of terms and conditions on research management further incentivised change within universities. Similarly, audits carried out via the RCUK Funding Assurance Programme now require universities to provide information about how they support RI (including information about related policies, procedures and training) and the processes they have for dealing with allegations of misconduct in research.

6.   Stakeholder dialogue and collaboration

6.1   Supporting and encouraging a positive RI culture requires all stakeholders in the research lifecycle to collaborate. Greater inter-stakeholder dialogue would help advance efforts to share good practice in upholding an RI culture, given that different stakeholders have complementary roles but different responsibilities. The Progress Report on the Concordat to support RI recommended creating a Research Integrity Forum to bring together stakeholders across the UK research community, which will be a helpful development.

6.2   Consideration should be given to focusing on shared challenges (e.g. ensuring the quality of peer review) and how stakeholders can better help each other (e.g. funders creating summary audit reports to share good practice).

6.3   Universities are best placed to continue to lead efforts to implement and communicate about activities to foster RI within their own communities, given their appreciation of cultures and

what is effective. Universities are also in a position to open up greater dialogue about RI considerations with non-academic collaborators. Academics in leadership positions will continue to advocate about the importance of RI and to lead or support universities' efforts to heighten awareness, understanding and application of high RI standards, in some cases making it an explicit dimension of institutional research strategies. Our universities are continuing their efforts to ensure that the RI agenda is as much owned by individual academics as it is by institutions.

6.4   Russell Group universities have invested in creating posts to champion RI, and groups like the Russell Group RI Forum provide a useful vehicle for sharing best practices, a network for discussing live issues, and increase the effectiveness and reach of each university's internal efforts to foster RI. Since its origins the Forum has (and will continue to) come together to:

- Share information about Russell Group institutions' frameworks for fostering RI and innovations that have been effective or less effective;

- Hold in-depth discussions about individual components within institutions' frameworks for fostering RI (e.g. comparing and contrasting training approaches);

- Discuss how to manage collectively cases of potential research misconduct that cut across different institutions;

- Learn about Russell Group institutions' efforts to further embed RI considerations into routine business.

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Annex A

Links to the RI webpages of Russell Group universities:

Birmingham: www.birmingham.ac.uk/research/opportunities/integrity.aspx
Bristol: www.bristol.ac.uk/red/research-governance/researchintegrity.html
Cambridge: www.research-integrity.admin.cam.ac.uk/
Cardiff: www.cardiff.ac.uk/research/our-research-environment/integrity-and-ethics
Durham:www.dur.ac.uk/resources/hr/policies/research/ResearchIntegritypolicyandcodeofpractice.docx
Edinburgh: www.ed.ac.uk/governance-strategic-planning/research/research-integrity
Exeter: www.exeter.ac.uk/departments/governance-and-compliance/researchethics/integrity/
Glasgow: www.gla.ac.uk/services/rsio/researchstrategypolicies/researchintegrity/
Kings College London: www.kcl.ac.uk/innovation/research/support/conduct/index.aspx
Imperial College London: www.imperial.ac.uk/research-and-innovation/about-imperial-research/research-integrity/
Leeds: http://ris.leeds.ac.uk/researchintegrity
Liverpool: www.liverpool.ac.uk/research-integrity/
LSE:www.lse.ac.uk/intranet/researchAndDevelopment/researchDivision/policyAndEthics/ethicsGuidanceAndForms.aspx
Manchester: www.manchester.ac.uk/research/environment/governance/
Newcastle: www.ncl.ac.uk/research/ethics/goodpractice/
Nottingham: www.nottingham.ac.uk/research/ethics-and-integrity/index.aspx
Oxford: www.admin.ox.ac.uk/researchsupport/integrity/
Queen Mary: http://www.qmul.ac.uk/research/principles-strategy/policies/index.html
Queen's University Belfast:
www.qub.ac.uk/Research/Governance-ethics-and-integrity/Research-integrity/
Sheffield: www.sheffield.ac.uk/ethics
Southampton: www.southampton.ac.uk/research/integrity.page
UCL: www.ucl.ac.uk/research/integrity
Warwick: www2.warwick.ac.uk/services/ris/research_integrity/
York: www.york.ac.uk/staff/research/governance/research-integrity-and-ethics/