

Russell Group response to the HEFCE consultation on the concordat to support research integrity

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

The Russell Group recognises research integrity and good governance are fundamental to the UK's international research reputation and global competitiveness. Our universities are committed to good practice in all areas of research governance. The commitments outlined in the Concordat to Support Research Integrity are complementary to many principles already established and adopted by host research institutions. As such the commitments within the concordat are a reasonable foundation for an overarching research integrity framework for UK research.

2. *Do you agree with the proposal that demonstrating compliance with the research integrity concordat should be integrated into HEFCE's existing reporting requirements, and that this represents a proportionate and reasonable way to ensure compliance?*

An overarching approach is an appropriate mechanism to assure the integrity of UK research and has a number of benefits. In particular, it would give confidence that universities take research integrity seriously and are committed to delivering the appropriate procedures, systems and guidance to support their research staff in applying good practice when they conduct research. It is also preferable to a more piecemeal approach from individual research funders which might legitimately cover only those particular elements of research which they fund.

Where it occurs, research misconduct must be dealt with by institutions and funding bodies as a matter of utmost importance. However, in respect of principles of research integrity and general good practice it is critical that universities are not overburdened with external audit and compliance monitoring which would generate excessive bureaucracy and costs.

A single, comprehensive framework for research integrity which all parties endorse will have benefit to the HE sector if it results in a consistent approach by all stakeholders, if it is clear from the outset that all stakeholders will work within that framework and that processes will be streamlined and not multiplied. A valuable outcome from introducing an overarching approach would be if research funders and other regulatory bodies bring their own protocols in line resulting in a more consistent approach across the sector with time.

We agree that integrating compliance with the Concordat into HEFCE's existing reporting requirements is proportionate and reasonable. However, the most appropriate route to do this is through the annual monitoring statement, not through the Financial Memorandum. This will give clear assurance that an institution in

receipt of HEFCE research funding, is compliant with the principles of the Concordat without adding additional financial audit and other costs.

We wish to see this as part of an overarching approach reducing the need for other research funders to introduce separate assurance arrangements and the unnecessary burden that would accrue from multiple monitoring requirements.

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