



UK Research Integrity Office

Sussex Innovation Centre
University of Sussex
Science Park Square
Falmer
Brighton BN1 9SB

20th June 2011

Andrew Miller MP
Chair
Science and Technology Committee
7 Millbank
House of Commons
London SW1P 3JA

Dear Mr Miller

House of Commons Science and Technology Committee inquiry into peer review

I write further to the oral evidence to the above inquiry of Professor Rick Rylance of Research Councils UK (RCUK), David Sweeney of the Higher Education Funding Council for England (HEFCE) and Sir Mark Walport of the Wellcome Trust. Regrettably, some of the comments made regarding the UK Research Integrity Office (UKRIO Ltd.), which I chair, were inaccurate.

I was surprised at the criticism that UKRIO Ltd. in its first phase did not provide support to all disciplines of research. UKRIO was in fact conceived to support the UK life sciences research community as a pilot for a wider remit. Since our inception, we have responded to enquiries on issues of research integrity across all subject areas and our published guidance is applicable to all disciplines.

The research community has been aware of this for some time. In 2009, RCUK's *Policy and Code of Conduct on the Governance of Good Research Conduct* recommended UKRIO's *Procedure for the Investigation of Misconduct in Research*, while the Economics and Social Research Council's *Framework for Research Ethics* (2010) included material from our *Code of Practice for Research* and cites UKRIO as a source of advice on issues of research integrity. These publications are binding on those in receipt of funds from the relevant organisation. Neither suggests that UKRIO or its guidance is applicable only to health and biomedicine. Indeed, demand from employers and researchers led us to support all disciplines of research from early in our first phase, including cross-disciplinary research, and we continue to do so.

During discussion of UKRIO Ltd., it was suggested that research integrity is an intrinsic responsibility of employers of researchers and should not be delegated. UKRIO Ltd. agrees entirely with the view that employers have the primary responsibility for the conduct of their researchers and for research carried out under their auspices. However, to suggest that employers delegate such responsibilities to UKRIO Ltd. shows a misunderstanding of our work and the reasons for our creation.

UKRIO was established by a consortium of funders to support employers of researchers. That is, to support the institutions which are legally responsible for resolving most issues of research conduct. We have never proposed that employers should delegate their responsibilities to us; instead we provide independent and expert advice on how they might fulfil them. The advice and guidance we offer is not mandatory. It reflects best practice in the conduct of research and addressing misconduct. This method of support has been welcomed: our published guidance has been adopted or otherwise used by many research organisations, including by over fifty universities, while in 2010 alone we helped with more than 60 cases (over one a week). It is evident that employers, well aware of their legal responsibilities for research integrity, are willing to come forward and seek guidance from UKRIO Ltd. when they need it.

It is not surprising that research funders say that UKRIO has not delivered an assurance mechanism on their behalf. It was never created to perform such a function, which has remained the responsibility of funding bodies. Rather, UKRIO was created to fill a gap in support to employers, to researchers and to the public. This has been achieved. I would argue that UKRIO Ltd. does indirectly support the work of research funders by promoting and improving research integrity in the organisations in receipt of their funds. It is regrettable that this was not acknowledged.

Organisations which provide funds for research must of course satisfy themselves that those funds are used appropriately. They have the power to operate appropriate assurance mechanisms through the terms and conditions of their grants and awards. UKRIO Ltd. welcomes efforts to streamline and harmonise such mechanisms, to ensure clear and proportionate guidance for the research community and avoid duplication of effort. We remain willing to contribute to the development of initiatives such as the proposed Concordat, which could benefit from our considerable expertise and unique practical experience. We agree that assurance and advisory functions must remain separate but that does not weaken the case for drawing on a common repository of skills and information.

Regardless of the assurance mechanisms used by research funders, employers, researchers and the public still need wider support on issues of research integrity, support which UKRIO Ltd. will continue to provide. Both the sponsors who created UKRIO and the UK Research Integrity Futures Working Group concluded that only an independent advisory body could win trust and successfully offer confidential and expert support to institutions, researchers and the public. In today's economic climate, it is unlikely that any other organisation will take forward the recommendations of the Working Group and provide an advisory service on issues of research conduct. While we recognise that none of the organisations concerned would have made such a decision lightly or willingly, this will leave the UK research community and the public in danger of having insufficient support on matters of research integrity and risks damaging our national reputation.

UKRIO Ltd. is therefore convinced that it must continue. The cost is modest compared with the much more ambitious plans that some stakeholders had envisaged as necessary for a research integrity body and are minimal compared to the damage from research misconduct and poor practice. UKRIO Ltd. operates very cheaply and cost-effectively, with a very small staff backed by a Board and a register of expert advisers, both of which work *pro bono*.

We welcome the initiatives being undertaken by research funders to support research integrity. There is a valuable perspective, alongside those of Government, statutory regulators, employers in the higher education, NHS and private sectors, research charities, learned societies, professional organisations, specialist bodies such as UKRIO Ltd. and, not least, researchers, research participants and the public. All

have an important contribution to make in support of research integrity. In particular, I feel it would be unfortunate if the unique experience, expertise and data massed by UKRIO since its creation were not drawn upon by others to inform initiatives in this field.

How research integrity might best be supported in the UK has been the subject of considerable discussion over many years. As you know, UKRIO was established as a result of such discussions. It is clear that researchers and those personnel who deal with issues of good practice and misconduct on behalf of their organisation value being able to seek our advice. They have welcomed the establishment of UKRIO, as shown by the continuing rise in the use of our services. We would not be approached for assistance if we were not needed. Discussions will undoubtedly continue on how other bodies might support research integrity and we remain ready to inform and participate in this process. Meanwhile, UKRIO Ltd. will continue to raise the profile of good practice in research and address misconduct. Our significant achievements to date in identifying and responding to concerns about research integrity provide the foundation for UKRIO Ltd. to continue to provide a much-needed service.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Ian Kennedy', written in a cursive style.

Professor Sir Ian Kennedy
Chair, UK Research Integrity Office