1. **Introduction**

1.1 The University of Nottingham is committed to research excellence and integrity and therefore takes research integrity seriously. The University of Nottingham (Nottingham hereafter) requires all staff and students engaged in research to maintain the highest standards of rigour and integrity in the conduct of their research. Nottingham’s Code of Research Conduct and Research Ethics provides a framework for the governance of all research throughout the University and requires that all researchers adhere to the highest standards of performance and ethical conduct, and to all applicable statutes and Government guidelines in carrying out their research. Robust procedures, as laid out in Nottingham’s Code of Research Conduct and Research Ethics, are actuated for investigating potential cases of research misconduct.

1.2 The 2012 Concordat to Support Research Integrity, helped raise the profile of research integrity issues at Nottingham and more broadly. Following its publication, Nottingham undertook a gap analysis to evaluate the requirements of the Concordat against our own processes and practices related to research integrity, and as a result augmented existing internal support for research integrity, and introduced new training and guidance. Research Integrity and ethics are both elements included in Nottingham’s Research Strategy 2020.

2. **Views on the ‘extent of the research integrity problem’**

2.1 A key compliance requirement of the Concordat is for universities to publish annual statements on research integrity which should include high-level statements on any formal investigations of research misconduct that have been undertaken. Nottingham has reported the number of formal investigations of research misconduct through these annual statements which are publicly available on the university website. It is possible that the improved reporting and disclosure of the number of formal investigations of research misconduct by universities through these annual statements have created an impression that the number of formal investigations of research misconduct cases have increased. Nottingham’s view is that although there are occurrences of the most serious forms of research misconduct and such cases have been, and remain, rare within the UK. There is a possibility that the high profile of such cases increases the perception that there is a more substantive research integrity problem in the U.K. The examples of, and data on, research misconduct in the POSTnote are mostly drawn from outside the U.K.

2.2 There is limited reliable evidence available on the rate of occurrence and types of research misconduct within the UK and how this varies across different disciplines. Therefore, there is limited evidence available to determine if there is a research integrity problem in the UK. Further research on the type and frequency of research misconduct as well as on questionable research practices (QRPs) in all fields of research is needed to be undertaken by both the universities as well as the industrial and other non-academic organisations (which undertake research) in the UK to gauge the scale of the research integrity problem in the UK.

3. **Views on research integrity and culture and possible causes and drivers**

3.1 Nottingham supports the proposed mechanisms for re-alignment of the incentives for researchers in the POSTnote. Universities are already reporting on research integrity through Annual Statements to the public, RCUK Annual Assurance reporting on research integrity to the Research Councils and the Annual Monitoring Statement to the HEFCE. Any additional reporting in REF should not duplicate this reporting but there might be benefit in REF submissions including statements
which fostered and encouraged submissions to reflect on research integrity issues in their disciplines.

3.2 In our view the Report on The Culture of Scientific Research in the UK, Nuffield Council on Bioethics, December 2014, provides a comprehensive overview of many of the issues and concerns of the relationship between the research environment and research integrity. From Nottingham’s perspective we would highlight the factors around the challenges of doing collaborative, cross-cultural resource which is changing as a result of new funding routes such as the Global Challenges Research Fund and the Newton Fund and the uncertainties that result from Brexit. As changes in the research environment (including funding) are proposed, we would like to see research integrity considered with an emphasis on encouraging, and where appropriate funding, positive research integrity practice.

4. Views on the ‘effectiveness of controls / regulation (formal and informal) and what further measures are needed’

4.1 Nottingham and other Universities currently have the flexibility to implement approaches to and controls for Research Integrity that works best for them and their specific research contexts. This enables them to be effective in nurturing a vibrant research culture and environment of integrity rather than working to be compliant with external regulation.

4.2 Nottingham does not support the creation of a new regulatory body for research integrity as recommended in the ‘Peer review in scientific publications’ Report, published in 2011, and subsequently in the POSTnote, because this will divert the limited dedicated resource that Nottingham has for nurturing research integrity, to evidencing compliance with external regulation. It is evident from the experience of the USA that setting up a regulatory body has been ineffective in either improving standards or decreasing occurrences of research misconduct. Setting up a new regulatory body in the UK is unlikely to be effective in reducing occurrences of research misconduct or improving the standards further.

4.3 Nottingham supports the view that UKRIO has been successful in promoting research integrity and in winning the trust of the researchers and the managers of the universities because of the advisory nature of its services/remit. It concurs that it would be inappropriate for UKRIO to be the regulatory body. Nottingham supports UKRIO’s provision of training and advisory services to the research community and universities.

4.4 Nottingham supports the incentive schemes for the researchers as recommended in the POSTnote.

5. Views on ‘what matters should be for the research / academic community to deal with, and which for Government’

5.1 Universities are best placed to continue to lead the work and the energies to plan, develop and implement and communicate about the work that are needed to cultivate and promote research integrity within their own researcher communities and within their own distinct cultures.

5.2 It is crucial to expand the awareness and understanding of research integrity amongst external collaborators nationally and internationally, both academic and non-academic and commercial
collaborators and partners, and the researchers and academics are best placed to open up discussions and talks about research integrity considerations with their collaborators.

5.3 A positive culture of research integrity is possible and thrives when universities and the researchers work in coordinated way and in partnership with all other stakeholders of research such as funders, publishers, professional bodies and learned societies, and the public. Government influence through the research funders will continue to help the universities to advance their thinking and efforts to uphold a culture of research integrity, e.g. encourage publishers to work with universities for better and improved peer review processes and systems; encourage funders to produce summarised audit reports with examples of research excellence and integrity for sharing of best practice with the universities.

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