## Research Integrity Concordat: Imperial College London Response to Consultation on Proposed Implementation from 2013-14

Consultation Question 1: Do you agree that compliance with the research integrity concordat should be a condition of HEFCE grant?

## Agree.

The College agrees that compliance with the research integrity concordat should be a condition of HEFCE grant. This compliance should be based on assurance that suitable processes are in place.

Consultation Question 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?

Agree.

The College takes the view that a statement in the Annual Monitoring Statement confirming that procedures are in place to ensure compliance with the research integrity concordat would be a proportionate and reasonable way to ensure compliance. HEFCE's primary monitoring should focus on the internal processes and procedures in place to support research integrity, not on individual cases. It is important not to create an impression that HEFCE will have a role as a national body in individual cases, effectively as an appeals body. This would create inappropriate incentives for universities in considering cases effectively. In addition to this, it is already recommended in the Concordat to Support Research Integrity that institutions should provide a short annual statement to their own governing body that provides, among other assurances, a high-level statement on any formal investigations of research misconduct that have been undertaken; it is suggested there that to improve accountability, and to provide assurances that measures being taken continue to support consistently high standards of research integrity, this statement could be made publicly available.