

STATEMENT OF COMPLIANCE WITH THE CONCORDAT TO SUPPORT RESEARCH INTEGRITY

Section 1: Key contact information

1A. Name of organisation	Manchester Metropolitan University
1B. Type of organisation:	Higher education institution
1C. Date statement approved by governing body	22 nd November 2024
1D. Web address of organisation's research integrity page	https://www.mmu.ac.uk/research/research-integrity
1E. Named senior member of staff to oversee research integrity	Professor Nick Brook, Pro-Vice-Chancellor Research
	n.brook@mmu.ac.uk
1F. Named member of staff who will act as a first point of contact for anyone wanting more information on matters of research integrity	Sam Gray, Director of Research & Innovation
	s.gray@mmu.ac.uk

Section 2: Promoting high standards of research integrity and positive research culture.

Description of actions and activities undertaken

2A. Description of current systems and culture

The University promotes high standards of integrity in the conduct of research carried out in its name or on its premises. This includes research undertaken by staff, students, doctoral students, visiting or emeritus staff, contractors and consultants.

The University recognises its obligations to the wider research community, to the funders of research and to society. It aims to fully comply with the UK Concordat to Support Research Integrity.

We promote a culture based on principles of academic excellence, inclusivity, honesty, openness, accountability and responsibility. This is delivered through a governance structure which includes a University Research Ethics and Governance Committee supported by an ethics committee in each of our four faculties and a Human Tissue Act Committee. These committees report into the Research and Innovation Committee as part of the University's Academic Board.

Our policies, procedures, and guidelines are publicly available:
<https://www.mmu.ac.uk/research/research-integrity>.

We have developed an online system called EthOS (<https://ethos-apply.mmu.ac.uk/>) to deliver an efficient and proportionate ethical review process. EthOS also enables the delivery of other areas of research governance such as compliance with data protection legislation and the Prevent Duty.

We monitor our adherence to commitments and obligations through an annual schedule of audits and a reporting cycle which is supplemented through independent external audits.

2B. Changes and developments during the period under review

1. Audits and Reviews

1a. Audit into efficiency and effectiveness of ethics review processes

We have carried out a major review of the efficiency and effectiveness of research ethics processes and procedures. We invited independent auditors UNIAC to carry out this work and a summary of their findings is:

- They concluded with reasonable assurance regarding the efficiency and effectiveness of the policies, processes and systems in place to support ethical review.
- The design of the governance framework including roles and responsibilities, committee membership, standard operating procedures, and reporting, all reflect core principles and sector good practice set out by UKRIO/ARMA.
- The University complies with the ethics elements of the Concordat to Support Research Integrity.
- There are robust procedures in place for complying with external legal and regulatory requirements and these are operating as intended, for example as evidenced by the Human Tissue Authority Audit in 2023.
- A culture of annual faculty audits, evaluation of operational effectiveness and assessment of FREGC committee performance all provide assurance on effective delivery of reviews.
- A Research Ethics Group has recently been established to address operational challenges, including growth in volume of applications.
- Academic colleagues report good engagement and overall support from the team in R&I.
- Review of documentation against UKRIO/ARMA good practice and approaches employed at more research-intensive institutions identifies that some aspects of the University ethical policy framework could be better developed - in better-defining and explaining ethical principles.
- This is also evident in institution-level training material, and together with a lack of clarity about the different functions of the Ethos system, contributes to inconsistent reviewer behaviour e.g. delving into methodologies or returning proposals for amendment for non-ethical reasons.
- In common with many institutions, some of the language used in policies and processes fuels a risk-avoidance culture which some academics describe as policing, rather than a culture which enables well-manged risk taking.

The auditors raised three moderate risk findings related to:

1. Guidelines on good research practice and training material do not define underpinning ethical principles and benefits and there is evidence that ethical review and governance issues have become conflated.
2. Fieldwork identified a range of opportunities to improve efficiency of the ethical review process including clarifying where review is not needed,

clarifying the purpose of the Ethos system, reviewing the protocol for non-medical research, and speeding up second reviews.

3. There is limited training and CPD, and minimum training expectations are not defined for some roles.

The audit raised two low risk findings relating to:

1. enabling a more supportive culture around ethical review
2. completing the review of the procedure on investigating research misconduct,

The audit raised one advisory finding on expanding and strengthening the annual statement on compliance with the Concordat on Research Integrity.

The review identified the following areas of good practice:

1. the ethics governance framework is well-designed and reflects sector good practice.
2. Faculty leadership of ethical review is strong, with extensive evidence of proactive communications and development of subject specific resources.
3. Faculty teams demonstrate culture of innovation and desire for continuous improvement in this area.

1b. Review of research involving aquatic mammals and invertebrates

We invited an expert in animal research and licensing to visit the University to review our licencing arrangements and the facilities in which our aquatic mammals and invertebrates are maintained. The review concluded that our current arrangements were “correct, fit-for-purpose and ethically sound.”

2. Ethical approvals

Within the academic year 23/24 the University has granted 7416 ethical approvals including 419 full application approvals; 6978 UG/PGT approvals and 19 unit-level approvals.

This represents a 10% increase on approval figures for last year (driven by an increase in UG/PGT approvals) though full approvals for projects led by staff and doctoral students remains very similar.

3. Training and development

The central and faculty-based Research Ethics and Governance teams have continued to run various training sessions to strengthen compliance with the Concordat. Training is flexible to the needs of respective teams, audiences, and knowledge of research integrity. Training has been supplemented by Faculty Ethics Digests. Following new appointments in several Faculties, the central team

has provided additional sessions of in-person training for Faculty Heads of Research Ethics and Governance. Training activity will be enhanced in the forthcoming year in line with the finding from the review detailed in section 1a.

4. Highlights from Research Ethics and Governance Committee (REGC)

The REGC has met 3 times over the year. We were pleased to welcome two new lay members to the Committee, Catherine Boyd and Mike Wanless, who were appointed following an external recruitment process.

We have hosted good discussions at REGC on subjects ranging from Trusted Research, to what to do about fake participants in online interviews, to the challenges and opportunities posed by Artificial Intelligence.

REGC paid tribute to Professor Sue Baines, Faculty Head of Research Ethics and Governance in the Faculty of Arts and Humanities who sadly passed away during the academic year.

5. The Committee on Research Integrity (CORI)

The University was pleased to host a workshop convened by CORI into the potential indicators that could be used to demonstrate compliance with the Concordat for Research Integrity. The workshop was attended by members of REGC and welcome was given by Professor Mark Sterling, Pro-Vice-Chancellor for the Faculty of Science and Engineering.

6. Personnel changes

There have been new appointments to Head of Research Ethics and Governance across three of the University's faculties:

- Dr Adi Kuntsman was appointed in Arts and Humanities.
- Dr Robert Dempsey was appointed in Health and Education.
- Professor Alun Williams was appointed in Science and Engineering.

Sam Gray is the University's new Director of Research and Innovation.

Emma Columbine takes up a new post as Research Ethics and Governance Manager.

2C. Reflections on progress and plans for future developments

The independent audit demonstrates that we have made strong overall progress against the Concordat for Research Integrity and the findings set out a clear direction of travel. The review has already helped us to consider the balance between efficiency of processes and risks and the ways in which we communicate the benefits of ethical reviews to staff and students.

Our forward plans are focused around delivering the recommendations of the audit and include a refresh of our overarching ethical framework, a revision of the EthOS ethical review system to ensure that it is as efficient and effective as possible and the introduction of enhanced training and development provision. We plan to make changes to support staff and students to align with the Trusted Research agenda and we will focus on improvements in the understanding of research ethics and integrity amongst doctoral students and their supervisory teams.

Section 3: Addressing research misconduct

3A. Statement on processes that the organisation has in place for dealing with allegations of misconduct

We have two policies in relation to research misconduct. The Procedure for the Investigation of Allegations of Research Misconduct (available at: <https://www.mmu.ac.uk/research/research-integrity>) is the route for allegations in connection with staff and doctoral student research (excluding plagiarism) and the Academic Misconduct Policy (available at: [Academic Misconduct Policy \(mmu.ac.uk\)](https://www.mmu.ac.uk/academic-misconduct-policy)) which is the route for investigating allegations against taught students in formal assessment processes.

These processes are promoted through the University's website and they are promoted through our ethics training.

The effectiveness of these channels is monitored through annual surveys such as CEDARS. Our latest results found that the majority of our researchers know how to raise a concern around research misconduct (above the average for the sector) but the data suggests that our researchers are less comfortable than the sector in reporting issues.

The Procedure for the Investigation of Allegations of Research Misconduct has been reviewed in line with the findings from the audit and a new version of the policy will be promoted in 2024-25. The new version of the procedure will speed up the time it takes to conduct investigations and give faculties greater powers to be able to investigate and resolve allegations swiftly. These changes are informed by user feedback, the results of our internal surveys and lessons learned from the use of the procedure.

3B. Information on investigations of research misconduct that have been undertaken				
Type of allegation	Number of allegations			
	Number of allegations reported to the organisation	Number of formal investigations	Number upheld in part after formal investigation	Number upheld in full after formal investigation
Fabrication				
Falsification				
Plagiarism	2	0		
Failure to meet legal, ethical and professional obligations				
Misrepresentation (eg data; involvement; interests; qualification; and/or publication history)				
Improper dealing with allegations of misconduct				
Multiple areas of concern (when received in a single allegation)				
<i>Other*</i>				
Total:	2	0		
*If you listed any allegations under the 'Other' category, please give a brief, high-level summary of their type here. Do not give any identifying or confidential information when responding.				
<i>[Please insert response if applicable]</i>				