

Research Ethics Policy and Procedure

Introduction

Research ethics is a set of principles governing the way in which any research involving an interaction between the researcher and other humans, or involving data relating to humans, is designed, managed and conducted. In addition to academic research undertaken by faculty, research involving human interaction or human data may arise as part of the learning of students at the School, for example in projects and coursework. This document describes the School's Policy and Procedure for ensuring that in preparing and conducting a research project, the dignity, rights, safety, and wellbeing of human participants are considered, respected, and safeguarded.

Scope

This Policy and Procedure governs the ethics of research across the School, and applies to all staff, students, and anybody else carrying out research under the auspices of the School, whether their current place of work is within or outside School premises. Specifically, it applies to research involving human participants, or data relating to directly identifiable human subjects (whether living or recently deceased). It does not apply to research involving secondary analysis of established datasets from which it would not be possible to identify any living or recently deceased person (although it should be noted that there must be a record in relation to data of this type that ethical procedures were following in gathering the data). However, where it is necessary for data to be anonymised by LIS staff or students, this Policy and Procedure applies.

This Policy and Procedure does not apply to any research that is commissioned by an employer as part of a student's work whilst on an immersive internship; this will be covered by the employer's own research ethics policies and procedures.

Legislative and best practice context

This Policy and Procedure have been drawn up with due regard to the reference to the [Data Protection Act 2018](#), the [GDPR](#), and the [Mental Capacity Act 2005](#). It has also drawn on best practice as set out by external organisations such as the [Information Commissioner's Office](#) (ICO), [UKRI Economic and Social Research Council](#), [UK Research Integrity Office](#) and [Universities UK](#) (see Annex 2 for these and other useful resources).

Links to other Policies and Procedures

This Policy and Procedure should be read in conjunction with other School regulations, policies and procedures, including:

- [Data Protection Policy](#)
- [Data Retention Policy and Detailed Data Retention Schedule](#)
- [Safeguarding Policy and Procedure \(including Prevent\)](#)
- [Code of Ethical Conduct](#)
- [Academic Freedom Policy](#)

Principles

The School's Research Ethics Policy and Procedure has been adopted in support of the School's wider commitment to academic freedom and excellence. It seeks to ensure sound ethical standards in research without creating a disproportionate and onerous procedure that will impede the conduct of academic research. It seeks to facilitate ethical research and promote a culture where students and staff continuously reflect on the ethical implications of their research.

Where a member of staff is teaching a module that comprises a piece of work that may include a research project, they must make students aware of the required ethical standards and this Policy and Procedure. They should also provide advice and guidance on the ethical implications of any proposed research project. This research project may be undertaken independently by a student or group of students, or in close collaboration with a member of teaching staff.

Policy and Procedure

Stage 1: Self-Assessment with Countersignature

Where a staff member or student has a research proposal that

- is under the auspices of the School; *and*
- is not part of work conducted on an immersive internship with an employer; *and*
- involves human participants (for example, interviews, surveys, focus groups) or involves data relating to directly identifiable human subjects

the staff member or student in question must complete the Research Ethics Review Checklist (Annex 1), which requires reflection on the potential ethical implications of their research and risk of harm to the participants.

If, on completion of the Checklist, a staff member determines that there are no significant ethical issues raised by their research, or that adequate safeguards will be put in place, they must mark this on the form in the designated section and gain a countersignature from the Director of Teaching and Learning or their nominee.

If, on completion of the Checklist, a student determines that there are no significant ethical issues raised by their research, or that adequate safeguards will be put in place, they must

mark this on the form in the designated section and gain a countersignature from the relevant School module leader.

Note: students may be asked by their module tutors to provide further detail on potential ethical issues and proposed safeguards in parallel with the Stage 1 process, in order to demonstrate that they have achieved the learning outcomes for the module. This, in itself, does not imply that proceeding to Stage 2 (panel review) will inevitably be required.

Stage 2: Application for Ethical Review

Where either the student or staff member, or the individual reviewing the checklist, determines that there are significant ethical issues raised by the research that are not satisfactorily mitigated by the proposed safeguards, they must mark this on the form and refer the research proposal for an Ethical Review by the Research Ethics Panel. They must do so by emailing the following to ethicalreview@t-lis.org:

- Completed Checklist (found at Annex 1)
- Detailed Research Proposal and Ethical Assessment
 - Research aims (500 words max)
 - Further detail on any aspect of the checklist that was ticked
 - Further detail on proposed safeguards
- Informed Consent documentation (see below)
- Any other supporting documents requested by the individual reviewing the checklist

Research proposals comprising the following must always be forwarded for an Ethical Review by the Research Ethics Panel:

- Research involving the collection of primary data from participants
- Research involving deception of participants, or that is intentionally conducted without their full and informed consent at the time the study is carried out or when the data are gathered
- Research which involves or may lead to the publication of confidential information
- Research where informed consent will be obtained orally but not in writing
- Research involving any of the following:
 - Vulnerable groups, i.e., individuals in a dependent relationship that means they can be coerced or pressured into taking part, such as children, or people with learning difficulties;
 - Sensitive topics, as defined by [Dickson-Swift, V. et al, Undertaking Sensitive Research in Health and Social Sciences](#);
 - Groups where permission of a gatekeeper is normally required for initial access to members (where involvement of the gatekeeper might raise questions as to whether the participants' taking part is fully voluntary);
 - Research which may cause undue psychological stress, anxiety or humiliation, or poses an elevated health and safety risk, to participants and/or researchers.

Research Ethics Panel

The [Research Ethics Panel](#) is a sub-committee of the Academic Council. It will be convened to review the ethics of research proposals as they arise, and always within two weeks of the submission of a proposal for review.

The Research Ethics Panel will ensure that adequate consideration has been given to the ethical aspects of a research project, reducing the potential for harm and upset to participants and researchers. The Ethics Panel will assess whether the research proposed can be ethical, i.e., whether:

- it is justified—whether it is likely to add to the existing knowledge base;
- it is of sufficient standard, including whether the researchers are qualified to undertake the research;
- participation is voluntary;
- incentives to encourage participation are appropriate or ethical;
- appropriately recorded consent is assured;
- adequate support and protection are in place for participants (and, if applicable, for researchers);
- the sensitivities of the research (e.g., cultural sensitivities) have been considered and appropriately managed;
- there is an appropriate policy and practice concerning confidentiality, anonymity, or acknowledgment of research participants;
- whether any risks of the research to the participants and/or researchers (in terms of dignity, rights, safety or wellbeing) are outweighed by the potential benefits;
- the research complies with all statutory and other guidance;
- the collection and management of data complies with data protection regulation and the School's [Data Protection Policy](#), [Data Retention Policy](#) and [Detailed Data Retention Schedule](#);
- there are any conflicts of interest;
- there are any issues of commercial confidentiality.

The Research Ethics Panel will make a decision by majority; where there is a split vote, the Chair shall have the final say.

The Research Ethics Panel will give written response to the researcher as quickly as possible, and in all cases within five working days of meeting to consider the research proposal.

Once a research project has gained approval from the Research Ethics Panel, it must be conducted as proposed; any significant change to the research methodology, approach or purpose must be reassessed by the Research Ethics Panel.

Where the student or staff member disagrees with the decision of the Research Ethics Panel, they may refer the matter in writing to a nominated independent member of the Academic Council within ten working days. The decision of the independent member of the

Academic Council will be final, and will be given in writing within fifteen working days of receiving the appeal.

Informed Consent

Where information is to be collected from human participants, prior informed consent must be obtained from those subjects for any use of their information. Where the research exposes its participants to a risk of harm, the researcher has an ethical duty to consider these risks, even where the participants have consented to participate in the research; this is particularly important in dealing with vulnerable groups.

Research that does not entail the direct participation of living human persons may nonetheless indirectly but significantly affect living persons. Researchers may be assessing information about identifiable individuals, the publication or analysis of which may have ethical or legal implications. For example, collection and use of archive, historical or legal materials may raise ethical issues for the families of deceased people. Researchers must consider these implications in considering the ethics of their research proposal.

Secondary use of datasets must be given careful consideration by the researcher and the Research Ethics Panel, especially where reliance is being placed on a presumed consent by subjects to the use of their information, or where there is a potential risk of disclosure of sensitive information.

For the purposes of Research Ethics Panel submissions, 'Informed Consent documentation' is defined as *either* (a) documentary evidence that the researchers have already obtained informed consent from all intended participants, together with a statement that no additional participants will be recruited; *or* (b) a copy of the information sheet that will be supplied to participants in advance of the research, when seeking consent, as well as the consent form that the researchers intend to use. The participant information sheet should include the name and contact details of the researcher and their supervisor, as well as information on what to do in the event of a complaint or concern about the research and details of how to withdraw consent.

Legal and data protection requirements

Any student or staff member conducting research must ensure compliance with the [Data Protection Act 2018](#) and the [GDPR](#), as well as the School's [Data Protection Policy](#), [Data Retention Policy](#), and [Detailed Data Retention Schedule](#). It is the researcher's responsibility to ensure that arrangements are in place to maintain the integrity and security of research data. Advice on data protection requirements can be obtained from the School's Data Protection Officer, the Registrar.

Training

All students will undergo training in ethical research as part of the programme, and this Policy and Procedure will be incorporated into this training. All staff undertaking research are required in the course of their career to have undertaken appropriate training or to have had significant relevant experience before embarking on an evaluation of the ethical implications of their research. Students or staff who do not feel that they have sufficient training or experience to evaluate the ethics of their research must seek advice from a senior member of the Teaching and Learning Department.

Failure to comply

Where a student fails to comply with this Policy and Procedure, they will be subject to the provisions of the [Academic Misconduct Policy and Procedure](#).

Where staff fail to comply with this Policy and Procedure, they will be subject to the School's Employee Disciplinary Procedure, which can be found in the Staff Handbook.

Audit

The Research Ethics Panel will periodically conduct a selective audit of current staff research projects. Where it considers that a study is being conducted in a way that is not consistent with the conditions of the project's original approval, the Panel may withdraw its approval.

The Director of Teaching and Learning or their nominee will audit a sample of student Research Ethics Review Checklists on an annual basis to determine whether the determinations of low or appropriately mitigated risk are appropriate.

Monitoring and Review

This Policy and Procedure is subject to oversight by the Research Ethics Panel, which is accountable to the Academic Council. This Policy and Procedure will be reviewed annually by the Research Ethics Panel and any appropriate amendments authorised by the Academic Council.

Annex 1: Research Ethics Review Checklist

Your details	
Name:	
Status (staff/student):	
Email address:	
<i>If you are a student</i>	
Name of supervisor:	
Name of module for which this research is being conducted:	
Proposal	
Name of proposal:	
Abstract (including purpose of research and methods, max 200 words):	
Wherever reasonable, have you received informed consent from the participants?	<p>Yes/No</p> <p><i>If you have not received informed consent, please set out the reasons why below</i></p>
Checklist	
<i>Consent</i>	

<ul style="list-style-type: none"> • Does your study involve participants who are in any way vulnerable, or who may have difficulty giving meaningful consent to their participant or the use of their information? • Are subjects to be involved in the study without their knowledge and consent? • Will the study require the cooperation of a gatekeeper for access to the groups or individuals to be recruited, and does the involvement of the gatekeeper raise questions as to whether the potential participants' involvement is fully voluntary?
<i>Research Design/Methodology</i>
<ul style="list-style-type: none"> • Does the research methodology involve the use of deception? • Does the research involve sensitive topics (e.g., personal, religious, subjects relating to sexual activity, illegal behaviour, violence or abuse, drug use)? • Will financial inducements (other than reasonable expenses and compensation for time) be offered to participants that might impact the objectivity of the research?
<i>Impact on subjects</i>
<ul style="list-style-type: none"> • Could the study induce unacceptable psychological stress or anxiety, harm or negative consequences?
<i>Confidentiality</i>
<ul style="list-style-type: none"> • Will the research involve the sharing of data or confidential information beyond the initial consent given? • Is there ambiguity about whether the data you are collecting is considered to be public? • Will the research involve administrative or secure data that requires permission from the appropriate authorities before use? • Will the research involve the use of visual or vocal methods that potentially pose an issue regarding confidentiality or anonymity?
<i>Legal requirements</i>
<ul style="list-style-type: none"> • Is there any reason why the research will not comply with the requirements of data protection legislation or the School's Data Protection Policy or Data Retention Policy?
<i>Dissemination</i>
<ul style="list-style-type: none"> • Are there particular groups who are likely to be harmed by the dissemination of the results of the study? • Is there potential for misuse of the findings of the study?
<i>Risks</i>
<ul style="list-style-type: none"> • Does the study pose any risks to our physical or psychological wellbeing or that of those working with you?
<i>Sensitive materials</i>
<ul style="list-style-type: none"> • Does the study involve accessing security sensitive material (e.g., related to terrorism/ violent extremism)?
<p>Summary ethical appraisal</p> <p><i>Complete this section based on whether you have checked any boxes above, or there are issues relating to informed consent</i></p>

Summary of ethical issues identified:	
Safeguards to be put in place:	
Level of training and relevant experience of researcher:	
Determination	
I have read and understood the School's Research Ethics Policy and Procedure and the questions in the checklist above and confirm that (select one)	<ul style="list-style-type: none"> • There are no significant ethical issues raised by the research • There are ethical issues raised by the research but adequate safeguards will be put in place • The research requires an Ethical Review by the Research Ethics Panel
Signatures	
Signature of researcher:	
Date:	
<i>Cosigned by:</i>	
Name:	
Role:	
Date:	

Annex 2: Useful Resources

[Information Commissioner's Office \(ICO\) Code of Practice on Anonymisation](#)

[ICO Code of Practice on Privacy Notices](#)

[Economic and Social Research Council Ethics Framework](#)

[Research Ethics Guidebook for social science researchers](#)

[UK Research and Innovation Policy and Guidelines on Research Integrity](#)

[European Code of Conduct for Research Integrity](#)

[UK Research Integrity Office Code of Practice](#)

[Universities UK Concordat to Support Research Integrity](#)

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Related documents: (eg associated forms, underpinning processes, related policies or overarching policies)	Research Ethics Panel: Membership and Terms of Reference Code of Ethical Conduct Data Protection Policy Data Retention Policy Detailed Data Retention Schedule Academic Council: Membership and Terms of Reference Academic Misconduct Policy and Procedure Staff Handbook (includes Disciplinary Procedure) Safeguarding Policy and Procedure (including Prevent) General Academic Regulations

Version Control			
Version	Author	Date	Brief summary of changes
1	Hannah Kohler (Director of	20/02/2019	Original draft

	Admissions and Student Support)		
2	Hannah Kohler (Director of Admissions and Student Support)	08/07/2019	Addition of information on research relating to internships
3	Prof. Chris Maguire (Registrar)	10/07/2019	Inclusion of provision for faculty research, included checklist step and annexed checklist, included resources, further detail on Panel procedure and membership
4	Prof. Carl Gombrich (Director of Teaching and Learning)	04/11/2019	Minor wording changes
5	Academic Council	18/12/2019	Requires review given overall update on general academic regulations in light of decision to pursue NDAPs
6	Dr Ash Brockwell (Faculty member)	02/03/2020	Subheadings to differentiate stage 1 and stage 2; addition of a clause on provision of additional information by students at stage 1 if requested by module tutors; addition of references to researchers' safety; further detail on Informed Consent documentation.
7	Dr. Priya Lall (Faculty member)	02/03/2020	Additional stipulations in relation to secondary analysis of established datasets; additions to

			Research Ethics Panel referral criteria
8	Academic Council	16/03/2020	Approved