



Research Ethics Policy

Introduction

1. Any staff or students undertaking research as part of their programme of study or employment have a responsibility for promoting and delivering good research practice.
2. Researchers should strive for the highest achievable standards in the planning, conduct and reporting of their research and demonstrate integrity in their dealings with others.
3. There are a number of ethical principles that should be followed when undertaking research. These ethical principles stress the need to do good (known as beneficence) and do no harm (known as non-maleficence).
4. In practice, these ethical principles mean that all researchers, whether staff or students, need to ensure that their research is designed and conducted to the highest standards possible. In order to achieve this, researchers may, dependent upon the nature of their project, be required to:
 1. obtain *informed consent* from potential research participants or those responsible for their well-being (e.g. parents);
 2. minimise the *risk of harm* to participants;
 3. protect their *anonymity* and *confidentiality*;
 4. avoid using *deceptive or covert practices*; and
 5. give participants the *right to withdraw* from the research.

Scope

5. The Research Ethics Policy encompasses **all research** at **all levels** within the College. This includes
 - Undergraduate research (including final year projects and dissertations);
 - Postgraduate research projects (taught Master's, Master's by research, DMin, PhD);
 - Staff Research;
 - Research Consultancy.

6. Clearly the level of ethical oversight required for some projects will be far greater than that required for others, but for the avoidance of doubt this policy applies to all research at all levels.

Principles

7. The primary responsibility for the conduct of ethical research lies with the researcher.
8. Research undertaken by staff and students must conform to all UK legal requirements. This will include compliance with relevant data protection legislation and, if required, appropriate vetting of researchers working with vulnerable groups (Disclosure and Barring Service (DBS) approval, if required).
9. Supervisors of student research are responsible for ensuring that all students (be they undergraduate or postgraduate) are fully aware of their responsibilities and should assist the student to meet this requirement and to seek ethical approval for research projects. Research supervisors should do everything possible to ensure that appropriate ethical scrutiny of their students' research occurs and are required to advise on the processes required. **Researchers are required to demonstrate that they have secured the appropriate approval for their research.**
10. Supervisors of student research are required to be fully conversant with this policy and to maintain an up-to-date familiarity with ethical guidelines; they are to ensure that students and co-researchers are fully conversant and compliant with the appropriate ethical code/s.
11. The professional codes of conduct of external agencies and organisations are afforded primacy as a default position. It is the researcher's responsibility to ensure that any necessary external ethical approvals are obtained in advance of submitting an application for College approval, although some research requiring external approval may need prior screening by the College.

Informed Consent

12. Research involving human participants will be based, as far as possible and practicable, on the freely given informed consent of those under study. Should deceptive or covert methods be considered absolutely necessary (i.e. where it would otherwise be impossible to obtain the data required) then the principles outlined in paragraphs 19 - 23 below must be adhered to.
13. It is the responsibility of the researcher to explain as fully as is reasonable and appropriate and in terms meaningful to the participants: the aims and nature of the research, who is undertaking it, who is funding it, its likely duration, why it is being undertaken, the possible consequences of the research, and how the results are to be disseminated.

14. The power imbalance between researcher and researched shall be considered and great care must be taken to ensure that the latter are not pressurised into participation. Research participants must be made aware of their right to refuse participation at any time.
15. Where the research involves a lengthy data-gathering period it must not be assumed that consent given earlier in the study extends over the longer period. It will be necessary to gain consent annually, unless the nature of the research or that of the data to be collected changes, necessitating a more frequent review.
16. The researcher should explain clearly how far research participants will be afforded anonymity and confidentiality. If anonymity and/or confidentiality cannot be ensured, this must be made clear to research participants. All participants shall be fully aware that even if they agree to participate in the research, they have the option of rejecting the use of data-gathering devices such as tape-recorders and video cameras. The researcher should also explain to participants that they have the option at any stage to stop an interview if they feel any kind of discomfort or distress.
17. If there is a likelihood of data being shared with or divulged to other researchers, the potential uses of the data must be made known to the participants and their agreement to such use should be obtained.
18. Researchers should attempt to obtain the verbal assent of children and **must** obtain the written informed consent of their parent(s) or guardian and in relation to schoolchildren those who are *in loco parentis* in the place of research (e.g. if the research is to take place in a school). It is the researcher's responsibility (or the supervisor in the case of students) to identify in good time if a DBS check on the researcher is necessary, and to ensure that research does not begin until this has been received. Where research participants are young children or other vulnerable groups, it may be necessary to use a proxy in order to gather data. In this case great care must be taken not to intrude upon the privacy of the vulnerable participants. The researcher must consult relevant professionals and parents/guardians, as appropriate.

Deceptive and Covert Research/Research into Illegal Activities

19. Wherever possible researchers shall endeavour to avoid the use of deception in their research methods, as this violates the principle of informed consent and may invade the privacy of those under study, particularly in non-public spaces.
20. The burden of proof will rest on the researcher to show that no alternative methods are possible, and that the data sought are of sufficient value to over-ride the issues of free and informed consent. Where approval has been given, the implications arising from potential publication must be fully considered.

21. Covert research in non-public spaces (that is, where persons would not normally expect to be under observation), or experimental manipulation of research participants without their knowledge, should be a last resort when it is impossible to use other methods to obtain the required data. It is particularly important in such cases to safeguard the anonymity of participants.
22. Any research involving deceptive or covert methods, must seek approval from the Research Ethics Committee (REC).
23. Any proposed empirical research into illegal activities, also requires ethical approval. Please also refer to the Security Sensitive Research Policy. The College expects that empirical research into illegal activities shall not normally be undertaken by undergraduate students.

Confidentiality and Anonymity

24. The anonymity and privacy of research participants must be respected and personal information relating to them must be kept confidential and secure. Researchers must comply with the provisions of UK Data Protection legislation and shall consider whether it is proper or appropriate even to record certain kinds of sensitive information.
25. Whilst the researcher shall take every practicable measure to ensure the confidentiality and anonymity of research participants, s/he shall also take care not to give unrealistic assurances or guarantees of confidentiality. Research participants with easily identifiable characteristics or positions within an organisation, for example, must be reminded that it may be difficult to disguise their identity totally without distorting the data.
26. The identities and research records of participants must be kept confidential, whether or not an explicit pledge of confidentiality has been given.
27. All assurances given to research participants of confidentiality and anonymity, whether written or oral, must be accompanied by a declaration that the researcher may need to disclose information relating to certain types of illegal or harmful behaviours.

Funded Research

28. It is the researcher's responsibility to ascertain whether a funding body is engaged in activity that might compromise the reputation of the College or be in conflict with the College's mission and values. Advice can be sought from the Chief Operating Officer.
29. Researchers must ensure that funding bodies are made fully aware that any funding given must be free from the expectation of particular results.

When an ethical approval is required

Research not generally requiring ethical approval

30. Evaluation (including course evaluation, service evaluation or teaching evaluation), and market research provided the following criteria are met:
 1. The data is completely anonymous with no personal information being collected (apart from their name, their publically available contact details and a record of consent);
 2. The data is not considered to be sensitive or confidential in nature;
 3. The issues being researched are not likely to upset or disturb participants;
 4. Vulnerable or dependent groups are not included;
 5. There is no risk of possible disclosures or reporting obligations.

31. Research involving interviews with participants on subjects deemed to be within their professional competence provided:
 1. Items 1-5 above (note that item 1 can include an audio recorded conversation provided the transcript is fully anonymised and the recording then deleted);
 2. The subject matter is limited to topics that are strictly within the professional competence of the participants.

32. Audit of Data/Secondary data analysis provided:
 1. Items 1 and 2 above;
 2. The researcher is able to provide explicit consent from the data controller to access the data;
 3. The researcher is able to prove that the data will be used for a purpose which falls within the remit of the original consent provided by data subjects.

When ethical approval is required

33. An ethical review will be required in the following circumstances, where research involves:
 1. the collection or use of person-identifiable or special category data;
 2. the collection or use of data which is classed as sensitive or confidential;
 3. the use of audio/video recordings or photographs;
 4. vulnerable groups, including children under 18 or adults with special needs;
 5. the ingestion (by whatever means of delivery) of any substance by participants;
 6. any invasive/semi-invasive procedure or the administration of drugs;
 7. the physical testing of participants or the use of medical devices;
 8. the use of psychological tests or interventions;
 9. privileged access to clinical or personal records, or access to potential volunteers on the basis of their being or having been patients, or the invitation to volunteers to divulge facts about themselves which they would not wish the investigator to allow to become known to other persons;

10. any form of physical risk, distress, embarrassment, anxiety, stress, fatigue or inconvenience to the participant;
 11. any form of adverse effect on the personal, social or economic well-being of the participant;
 12. socially sensitive topics;
 13. security sensitive topics (in line with the Prevent Strategy);
 14. uncovering or likely to uncover illegal or potentially harmful activities;
 15. deceptive or covert research;
 16. research which might compromise the reputation of the College or be in conflict with the College's mission and values, although it is expected that this will be in very occasional cases given the rightful protection of academic freedom;
 17. research whose source of funding might compromise the reputation of the College or be in conflict with the College's mission and values.
34. Research which is related to external bodies will often require ethics approval through the external body's own systems. In these cases, the College will only give its own approval once the requirements of the external body have been met. It is the responsibility of the researcher to ensure that such approval is sought in good time. Specific guidance is given in Appendix 1 for all research which is subject to NHS and Social Care Governance procedures specified by the Department of Health (DoH).
35. Where an element of the research is conducted outside the UK, appropriate consideration must also be given to any legal and cultural issues prevailing in the location of the research which may have a bearing on the research.

Health and Safety

36. All those undertaking research must take account of any health or safety considerations affecting either the researcher or the research participants when preparing their proposal, and consider any ethical issues raised. Where health or safety concerns are raised, the first requirement is to undertake a suitable and sufficient risk assessment and to establish appropriate safeguards/measures. Advice can be sought from the College Health and Safety Officer.

Equality and Diversity

37. All research undertaken at the College must be in line with the Equality Act 2010 and with College policies on equality and diversity. Equality and diversity matters in relation to research may impinge on ethical approval, should be taken into account when designing the research methodology, and should be made explicit in the application.

Governance structures and reporting

38. Spurgeon's College Research Ethics Committee (REC) reviews research and provides advice to staff and students to ensure the correct standards of research are met.
39. The REC will assess whether:
1. the research is justified, i.e. whether it is likely to add to the existing knowledge base;
 2. it is of sufficient standard – including whether the researchers are qualified to carry out the roles proposed in the research proposal;
 3. the risk it poses to participants is outweighed by the potential benefits of the research;
 4. the research appears to comply with all statutory and other guidance;
 5. data management and handling appears to comply with the relevant legislation (data protection laws) and guidance;
 6. financial arrangements appear sound – it would be unethical to start research that may not be completed because insufficient funds were available.
40. The REC has as its members:
- A senior member of the teaching staff (Chair)
 - Director of Postgraduate Studies
 - Director of Undergraduate Studies
 - At least one additional internal tutor
 - One external academic member with expertise in the practise of research ethics
 - One member of Registry staff (Secretary)
41. Additional members may be co-opted onto the committee as necessary for short periods of time to advise on specific issues or research methods where it is felt the standing committee lack sufficient expertise.
42. The REC is a standing committee convened by the Academic Board. The minutes of the REC will constitute a formal record of its meetings and decisions.
43. The Committee will meet on an ad hoc basis as required. Consideration may be given to proposals by email.
44. The REC will provide regular reports to the Academic Board of its activities, including any recommendations, and on the extent and security of any security sensitive research being undertaken in the College.

Procedures

45. Any research being undertaken under the aegis of Spurgeon's College must follow the procedures as set out below.

46. Supervisors should review research proposals and assess (according to this procedure) whether ethical scrutiny and approval is required. If the supervisor decides ethical approval is not required then the reasons for this decision should be recorded in Part 1 of the Ethical Approval Form and signed by the supervisor. Forms should be retained on the student's file.
47. For student research that is likely to require ethical approval, supervisors should give the student the Ethical Approval Form to complete the relevant sections.
48. The supervisor should review the completed form to ensure that all sections have been completed satisfactorily and any relevant documentation has been included. They should then send this form to the REC.
49. The REC will review and scrutinise the documentation and either:
 1. Approve the proposal without any further action being required. This will be formally recorded and reported back accordingly;
 2. Refer the proposal back to the researcher for remedial action. The proposal must be submitted again, either for Chair's Action or consideration by the full REC;
 3. Refuse the proposal.
50. Where Chair's Action is required, it should be progressed by email correspondence between the Chair and at least two other members of the REC.
51. Full notes of all decisions must be recorded by the REC on the Ethical Approval Form. Decisions should be communicated to the researcher in writing, usually within 10 working days of the decision being made.
52. The decision of the REC is final in all cases, with any appeal against Chair's Action being heard by the full REC. Only if a researcher believes there has been maladministration or malpractice can they appeal to the Chair of the Academic Board (see paragraphs 57-61).
53. All Ethical Approval Forms must be retained on file and kept for at least 6 years, according to the College's Records Retention Schedule.
54. Where research involves human participants then no approach to potential participants may be made prior to ethical approval being gained.

Joint research

55. Where research is being conducted jointly with another institution, research ethical approval need not necessarily be sought from both the partner institution and from the College. The decision regarding which institution is

the most appropriate from which to seek ethical approval should take into account the location of the principal investigator and/or research. Ethical approval from another institution does not, however, exempt members of staff from compliance with the College's own research ethics principles as set out in this policy. It is the researcher's responsibility to make known any such approval granted by another institution to the REC who should check the compatibility of the institution's ethics policy with that of the College and record that approval has been given by an appropriate body.

Penalties

56. Any breach of this policy may be deemed as academic misconduct and any staff or students concerned may be subject to relevant disciplinary procedures.

Appeals

57. Researchers who are dissatisfied with the outcome of a request for ethical approval should first seek clarification from the secretary of the REC, in case there has been a misunderstanding or there is an issue which can be readily resolved.
58. After this if they still wish to seek a review of the outcome, they should appeal in writing (an email is acceptable) to the Chair of the Academic Board. The appeal should set out concisely why the researcher finds the outcome unsatisfactory, the precise grounds on which the appeal is being made, and the desired outcome of the appeal. Any appropriate supporting evidence should also be presented, along with the information given in response to the request.
59. Those considering an appeal should note that simply disagreeing with the outcome is not of itself sufficient; there must be other aspects associated with the decision (e.g. material circumstances relating directly to the request of which the REC was not aware; that material procedural irregularities occurred in the review process; or that there is demonstrable evidence of prejudice, bias, or inadequate review.)
60. The email or letter setting out the appeal should be copied to the Chair of the REC and, where appropriate, to the supervisor of a student research project or the Head of Department (or equivalent) for staff research. Note that only the researcher is able to make an appeal, although other parties (e.g. the supervisor for a student) may provide appropriate guidance and support.
61. The Chair of the Academic Board will acknowledge receipt of the email or letter within one working week of it being sent, and will advise the appellant when a meeting of the Appeal Panel is expected to take place (usually within 15 working days). The Appeal Panel will consist of the Chair of the Academic Board and two other members with no previous involvement in the matter. The appeal will be entirely paper-based and the Chair of the Board will communicate the outcome of the appeal in writing within 5

working days of the meeting. The Decision of the Appeal Panel is final.

Independent review

62. Once such a researcher has finished the internal appeals procedures the College will promptly send a Completion of Procedures letter to them. This will set out clearly what issues have been considered and the College's final decision.
63. If the appeal is rejected and this procedure has been completed, research students registered with validating Universities can request a review of their appeal:
- University of Manchester registered students can request a review of their appeal to the Registrar, Secretary and COO of the University of Manchester.
 - Liverpool Hope University registered students can request a review of their appeal to the Pro Vice Chancellor.
64. If a student believes the issue has not been appropriately addressed, the student may complain to the Office of the Independent Adjudicator (OIA) for Higher Education. The OIA review will focus on the final decision. The OIA must receive a student's Complaint Form within 12 months of the date of the Completion of Procedures Letter. For further details see: <http://www.oiahe.org.uk/rules-and-the-complaints-process.aspx>

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Appendix 1 – Approvals for research subject to NHS and Social Care Governance procedures

Students must access the Health Research Authority portal and use the Integrated Research Application System (IRAS) and the NHS Research Ethics Committee Central Booking Service for obtaining the necessary approvals. For social care research there is a national Social Care Research Ethics Committee which shares the same system. Both systems require a detailed research protocol and an evaluation of the scientific quality of the research proposal to be undertaken before ethical approval is requested.

Proposals may need to be submitted for pre-approval ratification to the Research Ethics Committee (REC) for methodological evaluation and any required changes must be undertaken before it is submitted to the local NHS Committee.

Comprehensive advice and guidance is available at <http://www.hra.nhs.uk/research-community/before-you-apply/> and information on IRAS is available at <http://www.hra.nhs.uk/resources/applying-for-reviews/integrated-research-application-system-iras/>

Following publication of revised governance arrangements for NHS Research Ethics Committees in 2011, the following types of research no longer automatically require approval by an NHS Ethics Committee:

- Research carried out on NHS premises
- Research carried out on NHS staff

In both cases, and subject to the guidance within the Health Research Authority portal, ethics approval can be sought via the College REC, as long as the research does not involve any other categories for which NHS REC approval would be required. Researchers should be aware that whilst full NHS REC approval may not be required, research in the aforementioned categories may still require research governance approval from the organisation in which it is taking place.

Researchers must contact the research and development / research governance office of the organisation in which the research is planned to check local requirements, obtain the necessary permissions and provide evidence of this to the College.

For full guidance on the types of research for which NHS REC approval is required, please refer to the Department of Health's policy document, which is available at: <http://www.hra.nhs.uk/research-community/before-you-apply/determine-which-review-body-approvals-are-required/>

It should be noted that the definition of research applied by the NHS differs from the definition applied by the College. Hence a research project that does not need to be ethically approved via the NHS Ethics Review Procedure may still come under the remit of the College's ethics policy.