University of Cumbria

Research Office

Research Ethics Policy

NB. This policy is available on the University of Cumbria website and it should be noted that any printed copies are uncontrolled and cannot be guaranteed to constitute the current version of the policy.

POLICY SCHEDULE	
Policy title	Research Ethics Policy
Policy owner	Research Office
Policy lead contact	Director of Research & Head of the Graduate School
Approving body	Research & Enterprise Committee
Date of approval	March 2018
Date of implementation	April 2018
Version no.	V1.4
Related Guidelines, Procedures, Codes of Practice etc.	1. Code of Practice for Research 2. Lone Worker Procedures for Researchers 3. Collaborative Working in Research
Review interval	Annual

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Research Ethics Policy

1. This Research Ethics policy reflects the principles set out in the University's [Code of Practice for Research](#), which directly supports the [Research Innovation and Enterprise Strategy](#). The code of practice demonstrates our commitment to the *[Concordat to Support Research Integrity](#)* (UUK, 2012), which seeks to provide a comprehensive national framework for good research conduct and its governance. The Research Ethics policy sets out in detail the requirements for ethical review for all research activity at the University of Cumbria. The policy must be read in conjunction with the *Code of Practice for Research*. In particular, the University's processes for dealing with misconduct in research are set out in the *Code of Practice for Research*.

2. Research integrity and good conduct are a crucial aspect of research at the University and a core part of a sustainable research culture. The University of Cumbria is fully committed to ensuring the good conduct of all research undertaken by its staff and students, and through its engagement with external research collaborators and stakeholders. High standards and integrity are of central importance to our commitment to research, and it is the responsibility of all members of staff engaged in research activity (hereinafter referred to as 'researchers') to maintain professional standards.

3. Researchers in the University are duty bound to society, their profession, the University and the funders of their research to accept responsibility for their own research conduct and practice, the activities of staff and students researching under their supervision, and for making best efforts to provide value for public or private funds invested in their research.

4. This policy reflects the requirements set out in the [General Data Protection Regulations](#) (GDPR).

Scope of this Policy

5. Ethical approval is required for all research carried out by staff and students at the University of Cumbria. It is the responsibility of the research supervisor (at both undergraduate & postgraduate level) to ensure that research complies this University Research Ethics policy and other relevant guidance.

6. This policy is applicable to:
   a) Academic, research, and relevant support staff employed by the University, and other individuals carrying out research at, or on behalf of, the University
   b) Students undertaking research and their supervisors
   c) Individuals holding honorary titles who are conducting research within, or on behalf of, the University

7. Concerning honorary titleholders or other researchers undertaking activity in collaboration with the university, ethical consideration should be managed in accordance with this policy or the equivalent at another institution where applicable.

When to request Research Ethics review

8. Research projects involving human participants, or data that could potentially identify human subjects, must undergo Research Ethics review. The relevant application form as indicated below must be completed.

9. Research Ethics review is generally not necessary for projects that do not involve human or living animal subjects or handle sensitive materials, and for those that draw on documentary material already in the public domain. For example, published biographies, newspaper accounts of an individual's activities, published minutes of a meeting, interviews broadcast on radio or television or online and diaries or letters in the public domain, or historical records authorised for public access by record offices.

Research Ethics Panel: Roles and Responsibilities

10. The University Research Ethics Panel is a sub-committee of the Research and Enterprise Committee (REC), which implements policies and procedures for undertaking research. The Research Ethics Panel is responsible for ensuring that proposed research submitted for consideration meets the required ethics standards, and that feedback to applicants will support development of the understanding of ethical and good research conduct precepts.

11. The Research Ethics Panel is primarily concerned with staff and postgraduate student research, and is tasked with ensuring that the dignity, rights and welfare of research participants are protected. The Research Ethics Panel will also keep under review relevant University policies and guidance and will report its actions to the Research and Enterprise Committee.

12. Proposals requiring health service or social care ethical review and clearance should follow the most recent guidance provided by the Health Research Authority (HRA) with regard to submission to the relevant NHS Research Ethics Committee (REC), through the Integrated Research Application System (IRAS). IRAS is a single online system for applying for permissions and approvals for health and social care/community research in the UK. NHS RECs review research taking place in or through the NHS, and other health and social care research as required by law or policy.

13. The University's Research Ethics Panel will scrutinise the ethical issues raised by research proposals from research students and staff involving research with humans and non-humans in accordance with this policy and with specific reference to the University of Cumbria's:
    - Code of Practice for Research
    - Lone Worker Procedures for Researchers

Staff and Postgraduate Research Students (MPhil, PhD)

14. For staff and postgraduate research students there is a specific form to be completed for research involving human participants. The form is submitted by email to research.office@cumbria.ac.uk. The Research Ethics Panel will scrutinise proposals for research involving human participants (that are not otherwise subject to Health Research Authority (HRA) ethical approval) and where appropriate, non-human animals.

Undergraduate and Postgraduate Taught Programme Students

15. For undergraduate and postgraduate students studying a taught programme ethical approval should be sought through programme lecturers and/or the relevant departmental procedures for research ethics review. There is a specific research ethics application for Taught Degrees (Bachelors & Masters) for study involving Human Participants.

16. The research ethics application for taught degree students should be submitted to both;

    1. Your supervisor for initial consideration and agreement

    and

    2. To your subject taught programme lecturers who have been identified as reviewing research ethics applications.

17. The University Research Ethics Panel has oversight for the taught degree research applications. Whilst, these applications are reviewed at a departmental/ subject programme level, each department research lead can raise or report any ethical issues or items for consideration directly to the Research Ethics panel as required.

Research involving Animals

18. There is a separate form for Research Ethics Application for [Research involving Animals](#) for: University Staff, Post Graduate Research (PgR) students, Taught Programme Undergraduate and Postgraduate students.

    a) For undergraduate and postgraduate students studying a taught programme ethical approval should be sought through programme lecturers and/or the relevant departmental procedures

    b) For staff and postgraduate research students the Research Ethics Panel will scrutinise these proposals, which are submitted to research.office@cumbria.ac.uk

19. Further guidance on research involving animals can be found at:

    - Home Office Guidance for Research involving Animals: www.gov.uk/research-and-testing-using-animals
    - Understanding Animal Research - some useful information for researchers: www.understandinganimalresearch.org.uk

Training

20. All students and staff undertaking research are required in the course of their studies or career to have undertaken appropriate training or to have had significant relevant experience before embarking on any research activity. Students and staff must responsibly consider whether their training or experience sufficiently qualifies them to evaluate the ethical implications of their research. If not, they should seek appropriate advice from within their department and/or from colleagues within their discipline with specific expertise in relation to research ethics. Thereafter, in the event of any remaining uncertainty as to the propriety of their research, they are required to contact the Chair of the Research Ethics Panel, Head of Department, or Departmental research lead, whichever is appropriate in order to identify adequate training.

21. This policy should be formally incorporated into any undergraduate/postgraduate training programme or documentation offered at departmental level. All degree programmes (undergraduate, Master's and research degrees) must incorporate at least one lecture, seminar or support session that covers research ethics. All students undertaking research for a dissertation or thesis should have access through their supervisor to appropriate advice and support in relation to research ethics.

22. All academic members of the REC, as well as Heads of Department and all those involved in the ethical review of staff or student proposals are required to have undertaken appropriate training and/or to have had significant relevant experience before taking up their responsibilities.

Individual Roles

23. It is an individual's responsibility to ensure that all research has had ethical review and gained approval for proceeding with the research.

24. In the case of research ethical review for undergraduate and postgraduate taught students, the subject team or supervisor will provide appropriate support and advice. It is important that guidance and feedback be given following ethical review for development of the understanding of ethical and good research conduct precepts.

Process and Procedure for Research Ethics Review
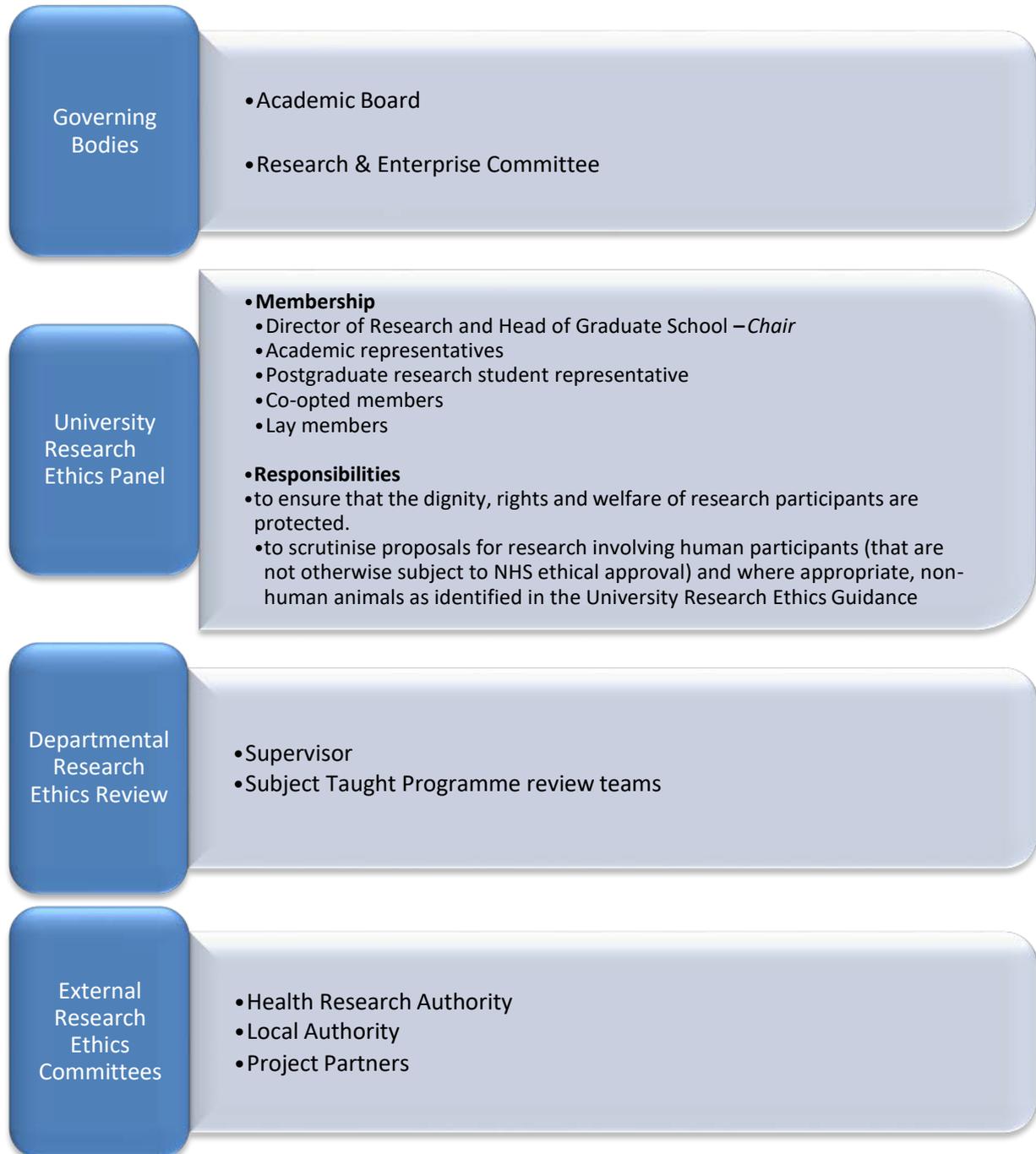
25. Two member of the panel independently review all applications submitted to the Research Ethics Panel. The Chair of the panel then considers the feedback from these reviewers and the advice or required amendments are detailed in a letter to the applicant.

26. The outcome will be one of the following;

    a) Approval granted with no changes or amendments required.

b) Provisional approval granted on condition of minor amendments or changes made to the application.

c) Approval not granted as major amendments or changes would be required for the project to proceed. A revised application would need to be resubmitted for further consideration.

27. The same research ethics review process is used at departmental level for taught programme undergraduate and postgraduate student researchers, through programme agreed procedures.

28. Research, which involves human participants, will always require ethical approval; in many cases, the risks will be minimal. The following research may involve more than minimal risk and this will be notified to the reviewers:

- research involving vulnerable groups – for example, children and young people, those with a learning disability or cognitive impairment, or individuals in a dependent or unequal relationship

- research involving sensitive topics – for example participants' sexual behaviour, their illegal or political behaviour, their experience of violence, their abuse or exploitation, their mental health, or their gender or ethnic status

- research involving groups where permission of a gatekeeper is normally required for initial access to members – for example, ethnic or cultural groups, native peoples or indigenous communities.

- research involving deception or which is conducted without participants' full and informed consent at the time the study is carried out

- research involving access to records of personal or confidential information, including genetic or other biological information, concerning identifiable individuals

- research which would induce psychological stress, anxiety or humiliation or cause more than minimal pain

- research involving intrusive interventions – for example, the administration of drugs or other substances, vigorous physical exercise, or techniques such as hypnotherapy

Reporting and Monitoring Relationships of Committees

29. The researcher is responsible for the monitoring the conduct of research that has received ethical approval. For students this would be in consultation with supervisors. The researcher must ensure that there is an appropriate continuing review of the research, taking into account any possible changes that may occur over the duration of the research project.

30. It is the responsibility of the researcher to alert the Chair of the Research Ethics Panel or Head of Department (whichever is relevant) if any further ethical implications arise. The researcher is responsible to ensure that data are securely held and preserved.

31. The Research Ethics panel will identify projects on which ethical issues raised are such that monitoring during the life of the research is required and this will become a condition of approval.

32. Researchers will be given details of the form and frequency of the monitoring, which will be proportionate to the nature and degree of risk entailed in the research. In some instances, researchers would be referred to the University's Collaborative Working in Research: Brief Guide and / or the Lone Worker Procedures for Researchers.

33. It is the responsibility of the Research Ethics panel to consider which projects impose a high risk from an ethical standpoint, including any reputational risk to the University and the political sensitivity of the research.

Figure 1 shows the relationship between committees for review of Research Ethics proposals, monitoring and reporting.

Governing Bodies
- Academic Board
- Research & Enterprise Committee

University Research Ethics Panel
- **Membership**
  - Director of Research and Head of Graduate School – *Chair*
  - Academic representatives
  - Postgraduate research student representative
  - Co-opted members
  - Lay members
- **Responsibilities**
  - to ensure that the dignity, rights and welfare of research participants are protected.
  - to scrutinise proposals for research involving human participants (that are not otherwise subject to NHS ethical approval) and where appropriate, non-human animals as identified in the University Research Ethics Guidance

Departmental Research Ethics Review
- Supervisor
- Subject Taught Programme review teams

External Research Ethics Committees
- Health Research Authority
- Local Authority
- Project Partners

34. REC may request the Research Ethics Panel periodically conduct a selective audit of current research projects.
35. Where significant concerns have been raised about the ethical conduct of a study, REC can request a full and detailed account of the research for a further ethical review.

The Integrity of Research involving Human Participants

36. Research should be ethical in purpose as well as in the processes involved. Any research documentation needs to state:
    - how appropriate informed consent will be obtained;
    - how the rights of participants will be protected;
    - how confidentiality is to be offered/assured;
    - how it will be ensured that people are free to refuse to participate, if they so wish;
    - how participants will gain from taking part or can see the value of their contribution.

37. Any research documentation should indicate:
    - how the findings are to be communicated to all stakeholders;
    - how the integrity and independence of the research community will be maintained;
    - how it will be ensured that the sources of funding are ethically acceptable

38. The following principles should be considered;
    - **Informed Consent:** The researcher should inform potential participants in advance of any features of the research that might reasonably be expected to influence their willingness to take part in the study.
    - **Accountable:** Researchers should consider, from the outset, the potential beneficiaries of their research. The research should be based on the informed consent of participants and/or their guardians.
    - **Confidentiality:** The results of research should be communicated in such a way as to protect the confidentiality of participants. Researchers are required to ensure confidentiality of the participant's identity and data throughout the conduct and reporting of the research.
    - **Openness & Honesty:** So far as possible, researchers should be open and honest about the research, its purpose and application.
    - **Anti-Discriminatory:** Researchers should have a value base that rejects the legitimacy of discrimination against any person based on difference, such as age, gender, sexual preference, class, ability, ethnicity or religion, and should seek to make a contribution to social justice.
    - **Protection from Harm:** Researchers must endeavour to protect participants from physical and psychological harm at all times during the investigation.
    - **Debriefing:** Researchers should, (where possible), provide an account of the purpose of the study as well as its procedures. If this is not possible at the outset, then ideally it should be provided on completion of the study.
    - **Reciprocal:** Research should be based on mutual dialogue between researcher and participants and should seek to ensure that results can be used for the common good.
    - **Honour Professional Values:** Professions have their own ethical codes of conduct. These ethics should not in any way be undermined or subverted by research.
    - **Accessibility:** All research should be capable of being disseminated in the public domain and be appropriate to the teaching and learning role of the university.
    - **Challenge:** Research should seek to challenge received wisdom and embrace openness and creativity in order to further understanding.

General Principles of Data Confidentiality and Access

39. All legal requirements pertaining to privacy, health, safety, and intellectual property should be met in accordance with the University's policies in these areas. Data supplier access

requirements with regard to the secondary use of datasets must be complied with at all times, including any provision relating to presumed consent and potential risk of disclosure of sensitive information.

40. The general principles of data confidentiality and access are contained within the *Code of Practice for Research*. However, researchers must ensure data relating to identifiable individuals must be held in accordance with the principles of data confidentiality legislation and any guarantees given to data subjects. Such data must be anonymised before it is made publicly available and researchers may place an embargo on access when anonymity and confidentiality cannot be guaranteed.

41. Research activity must comply with any requirements of the General Data Protection Regulation and the Freedom of Information Act. Due consideration must be given to any implications of Intellectual Property legislation.

42. The General Data Protection Regulations require that personal data is:

    a. processed lawfully, fairly and in a transparent manner in relation to individuals;
    b. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
    c. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
    d. accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
    e. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and
    f. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

Failure to comply with this policy

43. Failure to undertake a review of the ethical implications of research or to comply with any other aspect of this Policy or failure to apply reasonable care in assessing the likely ethical implications of a research project may constitute research misconduct.

Related University of Cumbria Documents:
Code of Practice for Research
Collaborative Working in Research
Postgraduate Research Code of Practice
Public Interest Disclosure Policy (whistleblowing)
Research Innovation and Enterprise Strategy
General Health and Safety Policy Statement
Safeguarding Policy, Procedures and Protocols
Lone Worker Procedures for Researchers

Reference documents:
Further information on research integrity and good research conduct can be found in the following documents:

UK Concordat to Support Research Integrity (2012)
Singapore statement on Research Integrity (2010)
Montreal Statement on Research Integrity (cross-border collaboration (2013)
European Code of Conduct for Research Integrity (2011)
Department for Business, Innovation & Skills and Government Office for Science: Rigour, Respect, Responsibility: a Universal ethical code for scientists (2007)
Research Councils UK: RCUK Policy and Guidelines on Governance of Good Research Conduct (2013)
Concordat to support the career development of researchers (2008, 2011)
Concordat on Openness on Animal Research in the UK (2014)
General Date Protection Regulation (2018)

Other relevant guidance:

Prevent Duty Guidance: for higher education institutions in England and Wales