Academic Policies and Procedures

UCSD UNIVERSITY CENTRE SOUTH DEVON

Research Ethics Policy and Procedure

HEFSPPD6

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Research Ethics Policy and Procedure

Contents

1. Higher Education Research Ethics Policy Introduction

1.1 The Institution is committed to ensuring the highest standards of integrity and reliability in all aspects of research and scholarly activity. Promoting and upholding of ethical behaviours and established practices form the foundations of research practice within the institution.

1.2 This policy sets out to clarify relevant research and scholarly activity guidelines for the institution regarding activities conducted by Higher Education students and staff conducted within the institutions control. The policy itself is informed throughout by University of Plymouth Research guidelines, as well as the Research Council UK (RCUK) and other relevant professional and research bodies.

1.3 Research activity governance is undertaken through a Higher Education (HE) Research Ethics Committee within the institution. The institution will undertake the ethical review of pure and applied research irrespective of funding source, and all such cases shall be referred to the HE Research Ethics Committee for approval prior to engagement.

2. Roles and Responsibilities of Higher Education Research Ethics Committee (HEREC)

2.1 Responsibility for the development, implementation and monitoring of research ethics policies remains with Higher Education Academic Board (HEAB), who may choose to discharge areas of responsibility to the Higher Education Research Ethics Committee (HEREC). The membership of the HEREC shall consist of appointed members from across the academic community. Members will attend a staff development session prior to becoming a member of the committee.

2.2 Depending upon the scope of the research, HEREC may appoint staff to approve Track A research without needing committee approval. Track A and Track B are explained further in section 13. From this point on, HEREC includes those appointed staff.

2.3 The HEREC is responsible for approving all proposed Higher Education research within the institution. This includes, but is not limited to, Dissertation Proposals on BA/BSc courses, Research Methods Proposals, scholarly research projects undertaken by staff and/or students and research undertaken in reference to any scholarly activity in which the institution is involved.

2.4 The HEREC will consider specific ethical matters on an ad hoc basis, for example, if a matter regarding another function of the institution is unable to reach a decision on an ethical matter for whatever reason the committee can provide guidance and support. In addition, the HEREC will conduct an annual audit of decisions taken by the Committee.

2.5 The HEREC will maintain a watching brief on emerging ethical issues relating to research and if necessary will report to HEAB if required.

2.6 Given the diversity of approaches to research and the specialist nature of some research projects (e.g. Biological Sciences, Animal Sciences, Sports, Early Childhood Studies, Business, Creative Industries and Health & Social Care) the Institution believes research proposals should be assessed by the committee or sub-committee with at least one subject specialist present.

2.7 Research that involves external review for Research Ethics, such as staff undertaking Postgraduate courses or research overseen by external agencies such as the NHS, are still required to undertake ethical review by the HEREC.

3. HEREC Review

3.1 All Committees involved in the review of research ethics should be independent of the researcher(s) proposing the research. Whenever a HEREC member has a research proposal considered by their Committee they should normally withdraw from discussion unless required to clarify issues for the other members.

3.2 Attendance for full HEREC meetings will be a majority of members. SUB-HEREC meeting must have a minimum of 4 trained Committee members present.

3.3 When considering research proposals Committees should strive to reach unanimity. If unanimity cannot be achieved, decisions to approve proposals will require the support of at least two thirds of the Committee membership or 4 members (whichever is most).

3.4 The Committee will be required to have an annual formal sitting at the start of each academic year. Decisions regarding dates and need for sitting shall be decided by the Committee Chair through discussions with the remainder of the Committee.

3.5 The Committee will be multidisciplinary and membership will take due account of equality and diversity.

3.6 Ethical review will normally take place when the research proposal has been confirmed e.g. an application has been placed using the online submission form as in section 13.

3.7 As well as the Institutions own policies, the HEREC must take into account University of Plymouth regulations, relevant professional ethical codes and the policies of research sponsors. If there is a difference in ethical standards between the Institutions policy and those of the University, relevant professional body or research sponsor, the Committee shall apply whichever is considered the highest standard of ethical practice.

3.8 In cases of collaborative research with other institutions, the research participation of Institution members of staff must be considered by the HEREC. Ethical approval by another institution in this circumstance is not sufficient to allow the research to proceed.

3.9 All research requiring primary data collection will require ethical approval. However in many cases the risks will be minimal. In such cases HEREC will be able to establish procedures for expedited review and will follow Track A.

3.10 The following research may involve more than minimal risk and should be considered by a full sub-Committee, in these circumstances it is recommended that the researcher consider their expertise, ability to conduct research to highest ethical standards and the availability of supervision that the institution can provide. Any examples where risk is considered to be more than minimal will involve proposals following Track B. Observational research within the researchers work environment, which does not involve intervention, would normally be Track A. If supervisors have any doubts on risk, then applications should be Track B.

Most often, research involving these categories would be viewed as high risk and might be rejected:

a) 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

b) 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

c) 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

d) Research involving deception or covert research in which participants' full and informed consent at the time of the study is not carried out

e) Research involving access to records of personal or confidential information, including genetic or other biological information, concerning identifiable individuals

f) Research which would induce psychological stress, anxiety or humiliation or cause more than minimal pain

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

h) Research involving the use of human tissue and medical data which is regulated by the Human Tissue Act 2004 (see Codes of Practice, provided by the Human Tissue Authority, 2017, for guidance - specifically Code E which relates to research).

The HEREC will always consider the potential impact of research on the environment, questions of environmental sustainability, and the sustainability of the research.

4. Monitoring Research

4.1 The HEREC must 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. Researchers will be given details of the monitoring which will be proportionate to the nature and degree of risk entailed in the research. Most often this will be conducted through supervision by a relevant academic member of staff.

4.2 The HEREC is responsible for identifying which projects impose a high risk from an ethical standpoint, including any reputational risk to the Institution and the political sensitivity of the research. If the HEREC concludes that the risk of the activity is too great, or outside its ability to monitor and control, the research proposal shall be rejected.

4.3 Details of identified high risk projects must be reported to the HEAB in the HEREC's Annual Report.

5. Appeals

5.1 Appeals against decisions by the HEREC, either to reject or require significant modifications to research, can be made formally. Initially the appeal should be to the HEREC via email/writing. If this is not successful, the researcher can appeal directly to the HE Manager and Academic Registrar (HEMAR).

5.2 Outcomes of appeals should be communicated in a timely fashion by the chair.

6. Whistleblowing and Complaints

6.1 Anyone suspecting misconduct on the part of a researcher has an obligation to report this in accordance with the procedures described in the following section.

6.2 No one reporting such suspicions shall suffer any disadvantage or action for doing so. The Public Interest Disclosure Act 1998 provides protection for the whistleblower against subsequent victimisation by an employer. This protection does not extend to malicious acts of whistleblowing. The Institution is wholly committed to the protection of genuine whistleblowers, students, staff or otherwise; and will regard any subsequent victimisation as a disciplinary offence to be formally submitted to Human Resources.

6.3 Where there is a genuine concern about disclosing their own identity, a confidential approach may be made directly via the Whistleblowing Procedure and associated procedures (for staff), and the HEMAR for Students who will then consider whether to refer the case on through the normal procedures. Staff should refer to the Whistleblowing Procedure for more guidance on the procedure to be followed.

7. Procedure in Cases of Suspected Research Misconduct

7.1 The University of Plymouth, the awarding body for degrees at the institution, has identified the following as Research Misconduct, whether deliberate, reckless or negligent:

a. Failure to obtain appropriate permission to conduct research
b. Deception in relation to research proposals
c. Unethical behaviour in the conduct of research (the University's policy Ethical Principles for Research Involving Human Participants applies but other ethical issues may also be involved)
d. Unauthorised use of information which was acquired confidentially
e. Deviation from good research practice, where this results in unreasonable risk of harm to humans, other animals or the environment
f. Fabrication, falsification or corruption of research data
g. Distortion of research outcomes, by distortion or omission of data that do not fit expected results
h. Dishonest misinterpretation of results
i. Publication of data known or believed to be false or misleading
j. Plagiarism, or dishonest use of unacknowledged sources
k. Misquotation or misrepresentation of other authors
l. Inappropriate attribution of authorship
m. Fraud or other misuse of research funds or research equipment
n. Attempting, planning or conspiring to be involved in research misconduct
o. Inciting others to be involved in research misconduct
p. Collusion in or concealment of research misconduct by others
q. Failure to comply with relevant legislation, including that relating to health and safety, data protection, intellectual property and animal experimentation.

This list is not exhaustive and other misconduct specifically related to research activity may be dealt with under this procedure.

7.2 The Institution and the University of Plymouth have a responsibility to investigate allegations of research misconduct fully and expeditiously. It also has a responsibility to protect researchers from malicious, mischievous, or frivolous allegations.

7.3 Anyone who has good reason to suspect misconduct should report it in confidence as appropriate to their relevant Programme Manager, Line Manager or HE Lead. Those who raise concerns in good faith will not be penalised in any way for doing so. Allegations should normally be made in writing, accompanied by any available supporting evidence.

7.4 In cases where an allegation implicates someone who is not subject to the Institution's or University's procedures, the Institution's HE Lead shall bring the matter to the attention of their employer or any other appropriate body.

7.5 Where the research is funded in whole or part by an outside grant, the HE Lead shall have regard to the guidance issued by the relevant funding body. The HE Lead shall ensure that any such body is given appropriate and timely information as to the instigation and progress of an investigation and any referral under disciplinary regulations.

7.6 If the researcher responsible has published research, especially research to which the misconduct relates, the Vice-Chancellor shall consider whether it is appropriate to inform Journal Editors or others of any finding.

7.7 If at any stage an allegation is found to have been malicious or mischievous in nature, the matter may result in disciplinary action being taken against those making the allegation.

8. Training of HEREC members

8.1 All members of HEREC will undertake appropriate training in research ethics. Training in research ethics will also be available to all staff through the Staff Development Programme.

8.2 All trained HEREC members are permitted to chair a SUB-HEREC meeting.

8.3 A general meeting will be held at least once each year, when members of the HEREC will have the opportunity to hear about and discuss issues in research ethics, as well as decide on membership for the academic year. There will usually be a meeting in August prior to the start of the academic year.

9. Good Practice in Research

9.1 All researchers within programmes delivering University of Plymouth courses have a duty to society, to their profession, to the University, their Institution and to those funding their research, to conduct their research in the most conscientious and responsible manner possible. It is a responsibility of Departmental Leads/Programme Managers and other academic staff to convey clearly the standards for research in their departments and relevant areas, and to ensure that adherence to those standards is a matter of course.

9.2 Many professional associations and research funding bodies have ethical codes and guidelines for the conduct of research. The Institution expects that compliance with this Code of Good Research Practice will meet the generic requirements of such bodies, but where additional specialist requirements are incorporated, Institutional researchers are expected to comply as appropriate.

9.3 Research Honesty: researchers have an obligation to be honest in respect of their own actions in research and in their responses to the actions of other researchers. All Institutional personnel must refrain from plagiarism, piracy or the fabrication of results and any instances of such acts.

9.4 Openness: researchers should endeavour to be as open as possible in discussing their work with other researchers and with the public upon completion. However, students must seek guidance from supervisors before doing so.

9.5 The Institution expects researchers to observe any appropriate standards of practice set out in guidelines published by funding bodies and other relevant professional bodies.

9.6 If appropriate, researchers must state the funding source clearly on their proposal and must consider the ethical implications of the source of funding, including any reputational risks for the institution.

9.7 Documenting results and storing primary data: throughout their work, researchers are required to keep data generated in the course of research securely in paper or electronic form, as appropriate.

9.8 The issue of authorship is important in the context of good research practice. The Institution expects anyone listed as an author on a paper to accept personal responsibility for ensuring that they are familiar with the contents of the paper, and that they can identify their contributions to it. The practice of honorary authorship is unacceptable, such as supervising lecturers claiming authorship for research tasks conducted by students.

9.9 Acknowledging the role of collaborators and other participants: in all aspects of research, the contributions of formal collaborators and all others who directly assist or indirectly support the research must be properly acknowledged. This applies to any circumstances in which statements about the research are made, including provision of information about the nature and process of the research, and in publishing the outcome. Failure to acknowledge the contributions of others is regarded as unprofessional conduct. Conversely, collaborators and other contributors carry their share of the responsibility for the research and its outcome.

9.10 Integrity in submitting research proposals: researchers should take all reasonable measures to ensure the accuracy and completeness of information which is contained in applications.

9.11 Integrity in managing research projects: researchers should take all reasonable measures to ensure compliance with sponsor, institutional, legal, ethical and moral obligations in managing projects.

9.12 Conflict of interest: anyone involved in any way in the conduct or management of research must identify and declare any conflicts of interest, whether legal, ethical, moral, financial, personal or other nature. Failure to do so may be classified as research misconduct.

9.13 Research misconduct: The Institution has an obligation to investigate accusations of Research Misconduct, and will do so using relevant policies and procedures.

9.14 Researchers have a responsibility to ensure the safety and well-being of participants working on their projects. They should assess potential risks and harm and should not require any researcher to undertake research that is likely to expose them to physical or psychological harm. All researchers also have a responsibility to consider their own safety and well-being and should raise any concerns with their programme leader, line manager or HE Lead.

10. Research Integrity Involving Human Participants

10.1 Informed consent: the researcher should, where possible, 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.

10.2 Consent in sensitive research should procedurally include verbatim instructions, and also consent should be obtained in writing.

10.3 Where children are concerned, informed consent may be obtained from parents or teachers acting in loco parentis. However, where the topic of research is sensitive, written informed consent should be obtained from individual parents.

10.4 Openness and honesty: there is an expectation that researchers should remain open and honest in their approach to research, and its purpose and application.

10.5 The University of Plymouth guidelines recognise that some types of research appear to require deception in order to achieve their scientific purpose. Any research involving deception as a research tool will require Track B approval. Deception will be approved only if the following conditions are met:

a) Deception is completely unavoidable if the purpose of the research is to be achieved

b) The research objective has strong scientific merit

c) Any potential harm arising from the proposed deception can be effectively neutralised or reversed by the proposed debriefing procedures.

10.6 Failing to inform participants of the specific purpose of the study at the outset is not normally considered to be deception, provided that adequate informed consent and debriefing procedures are proposed. Research which does not make clear the purpose of the work to participants will be required to gain Track B approval.

10.7 It is recognised that covert observation is a legitimate method of research where it is impossible to use other methods to obtain essential data. Covert research must observe current legislation on privacy. In cases of covert research in non-public settings if informed consent has not been obtained prior to the research it must be obtained post hoc. Covert research in non-public settings will require Track B approval.

10.8 Right to withdraw: where possible, participants should be informed at the outset of the study that they have the right to withdraw at any time without penalty.

10.9 In all research which involves children, those acting in loco parentis or the children themselves, shall be informed of the right to withdraw from participation in the study. All research involving child or vulnerable adult participants shall require Track B approval.

10.10 Protection from harm: researchers must endeavour to protect participants from physical and psychological harm at all times during the investigation. Where there is above minimal risk of harm, Track B approval must be gained.

10.11 Note that where stressful or hazardous procedures are concerned, obtaining informed consent whilst essential, does not absolve the researcher from responsibility for protecting the participant. In such cases, the ethical protocol must specify the means by which the participant will be protected, e.g. by the availability of qualified medical assistance.

10.12 Where physical or mental harm nevertheless does result from research procedure, investigators are obliged to take action to remedy the problems created. In the case of student work, this must be done with staff supervision. The HEREC should also be informed.

10.13 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.

10.14 Confidentiality: except with the consent of the participant, researchers are required to ensure confidentiality of the participant's identity and data throughout the conduct and reporting of the research.

10.15 Ethical protocols need to specify procedures for how 10.14 will be achieved. For example, transcriptions of interviews may be encoded so that no written record of the participant's name and data exist side by side. Where records are held on computer, the current Data Protection Act also applies. Research proposals which do not make clear consideration toward adequate ethical practice shall be rejected.

10.16 Ethical principles of professional bodies: this set of principles is generic and not exhaustive of considerations which apply in all disciplines. Where relevant professional bodies have published their own guidelines and principles, these must be followed and the current principles interpreted and extended as necessary in this context.

11. Research Integrity Involving Animal Subjects

11.1 Where suitable alternative methods are available, the use of animals in research should be avoided. It is however recognised that this is not always applicable. Any intervention research involving animals will require Track B approval. In most circumstances observational research can be Track A.

11.2 Research on living animals is regulated by the Animals (Scientific Procedures) Act 1986 through a stringent licensing system, operated by the Home Office, controlling what can be done, where and by whom. Permission to carry out a specific research project is granted only if the potential benefits to humankind or other animals are judged to outweigh any likely animal suffering. Compliance with legislation is monitored closely through the University of Plymouth Animal Welfare and Ethical Review Board which reports directly to the Office of the Vice-Chancellor. It is also monitored by the Home Office through its Inspectors who make regular visits, some of which are unannounced.

11.3 All projects involving animal research are underpinned by a commitment to the principles of the 3Rs (Replacement, Reduction, Refinement), and are subject to the University of Plymouth's ethical review process prior to authorisation by the Home Office. The Animal Welfare and Ethical Review Board includes lay representation as well as veterinary and animal care expertise as is required by law. The ethical review process also ensures that high standards of animal care, welfare and accommodation are maintained, and that persons working under the current Animals (Scientific Procedures) Act receive appropriate guidance and training.

12. Data Confidentiality and Access

12.1 Researchers must ensure access to primary data resulting from publicly funded research after its current use in research. 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.

12.2 Researchers must decide what constitutes 'primary data' in each research project. This will normally be an achievable data set, but may also include laboratory notebooks, completed questionnaires, video and audio files, and interview transcripts.

12.3 Primary research data collected by student researchers in the line of coursework, should be destroyed after it has ceased to be of academic value. This is usually after the award board has confirmed grading for the appropriate module.

12.4 Research Council requirements for the central archiving of data in electronic form must be observed.

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

13. Research Ethics Application System Online (REASOn) (subject to implementation)

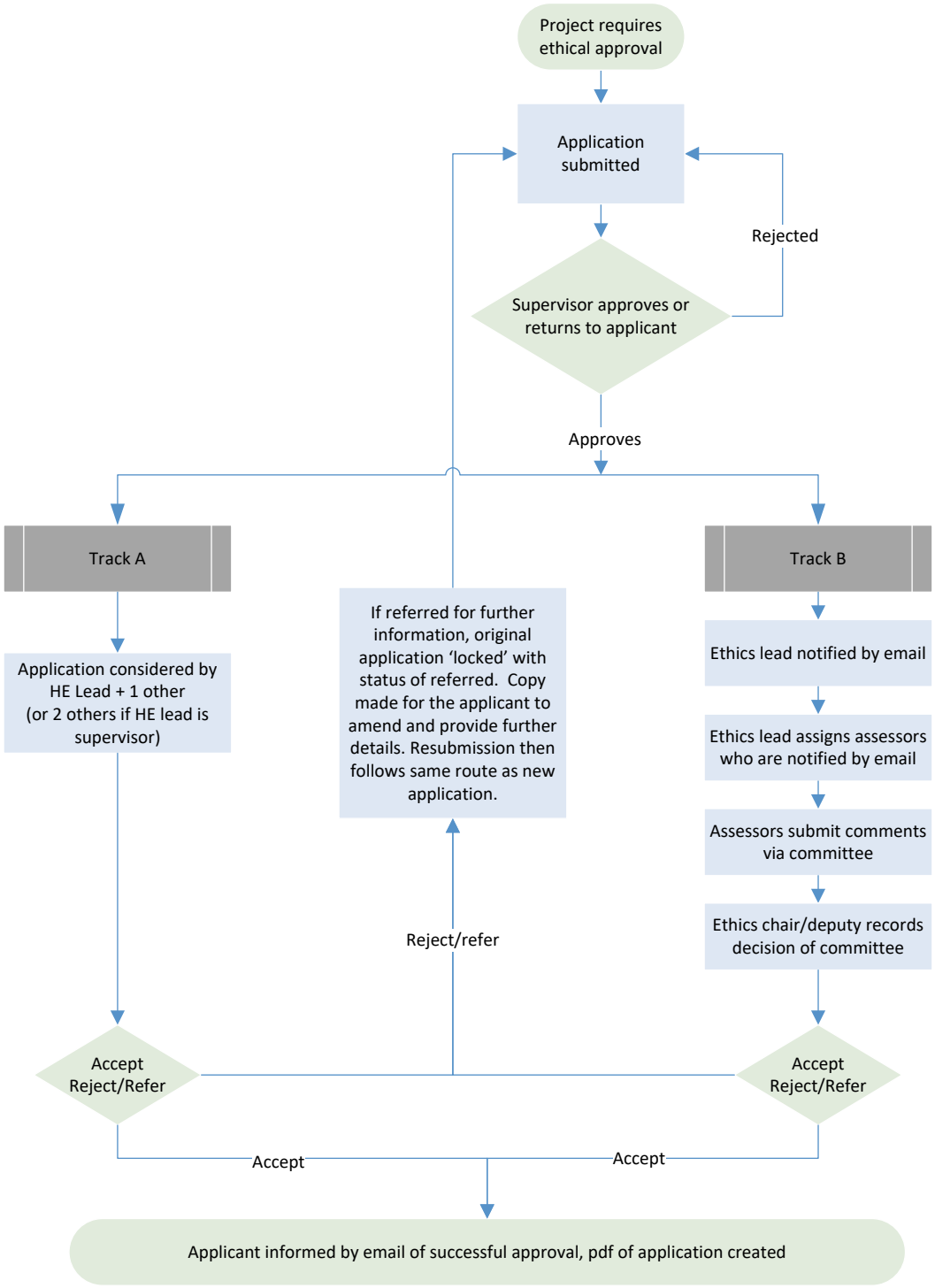

Figure 1: Research Ethics Application System Online process chart

13.1 The Research Ethics Application System Online (REASOn) process chart (Figure 1) shows the two potential routes for research ethics approval: Track A and Track B.

13.2 Please refer to the REASOn user guide for instructions on how to use the online system.

REVISION HISTORY

Ver	Date	Author	Description
1.0	4th May 2018	Dr Sue Rodway-Dyer	Conception
1.1	31st October 2019	A Wilson	Minor updates (language) including HEAB

APPROVAL

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1.0	HEAB		
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