HE Research Ethics Policy

V1 October 2024

Approved

1. Background

Nescot is committed to ensuring that professional conduct is maintained for research activity by ensuring that minimum ethics standards are maintained. The process of seeking ethical approval prior to undertaking research ensures that researchers have considered the impact of their proposed research on subjects and considered mitigation for any potential harm and as such are better able to confront ethical challenges throughout their research.

In order to maintain research integrity, all research undertaken as part of study at Nescot should aim to meet 4 key principles (World Conference of Research Integrity (WCRI), 2010);

- Honesty in all aspects of research
- Accountability in the conduct of research
- Professional courtesy and fairness in working with others
- Good stewardship of research on behalf of others

2. Purpose

The purpose of this policy is to set out requirements for the ethical considerations for academic research at Nescot College and defines the principles under which research at Nescot should be guided.

This policy sets out the process for ethical practice in field/primary research.

3. Definition of Research

For the purposes of this policy, research is defined as an original investigation with the aim of seeking new insights in a particular area. Research can be classified as desk-based or field research. Ethical approval for desk-based research does not need to be sought in advance.

4. Scope

This document sets out the research ethics requirements and processes of Nescot College to ensure that any research undertaken as part of a Nescot qualification or by staff and aligns with the values of the college.

4.1 This policy applies to all research-based activities that form an assessment for a higher education programme at Nescot College and covers all programmes with the exception of those validated by the University of Greenwich (UoG). Ethics approval processes for UoG qualifications follow those set out by the University and must be approved directly by the University.

4.2 This policy covers only research activity with an element of field/primary research and does not include research conducted solely from secondary sources.

4.3 This policy sets out the process for ethical research practice for researchers. Terms of Reference for the College Research Ethics Committee (CREC), established as an integral part of Nescot's research governance arrangements, can be found in Appendix A. Effective governance protects staff, students and others, to ensure that Nescot's integrity, reputation and accountability are maintained.

5. Principles of research

All research undertaken must comply fully with the below principles of research as outlined below. To illustrate this, an ethics approval proposal should be completed in advance of commencing any research activity.

5.1 Research must be fully aligned with relevant legislation

All research conducted at Nescot must ensure that it fully meets requirements of all relevant legislation. This includes, but is not exclusive to Equality Act 2010, General Data Protection Regulations (GDPR) 2018, Freedom of Information Act 2005 as well as any relevant professional, regulatory, statutory or learned society requirements. In instances where a researcher has conducted research outside of the UK, researchers are required to fully illustrate how they have met local legislative requirements in advance of conducting research.

5.2 Researchers are fully accountable for ethical consideration at all stages of research

The responsibility for planning and conducting research in an ethical manner falls with the researcher. This not only applies at the planning stage, but throughout the lifecycle of the research project, as researchers are required to reflect and adapt their research where necessary to take into account ethical challenges that may arise. Where this is the case, researchers should consider whether they will need to seek ethical approval for the amended research in line with this policy (ESRC Framework for Research Ethics).

5.3 Maximise benefits/reduce risk and harm

The potential impacts of the research should be considered and documented in advance in the ethics approval proposal and should consider both physical and psychological impacts of the study. Every step should be taken in the planning to mitigate risk and these must be coherently explained in the documentation before approval for research is granted. Where there are obvious risks that have not been outlined in the ethics proposal documentation, approval will also be denied pending the consideration of the risk and mitigating factors.

Special consideration should be given to younger participants or vulnerable adults for which specific elements of research may be interpreted differently or where the risks of research are heightened. Cultural or other demographic differences should also be carefully considered in the impact of research to foresee any potential risk of harm with relation to threats to values, dignity and mental health well-being. Researchers are advised to consult with the proposed sample in the design of their research activity in advance to mitigate such instances.

5.4 Participation is voluntary and appropriately informed

Researchers must ensure that participation in all research activity must be completely voluntary and that all participants are fully informed of the nature of the research in which they are participating in advance.

Any researcher wishing to incentivisation participation in any way, must seek permission for this in advance and must consider issues of confidentiality and bias/coercion in their proposal.

5.5 Rights of participants respected

Where the identity of individuals involved in the research is not necessary to add depth to the research outcomes, researchers are encouraged to keep personal identifying information about individual participants fully anonymous. Where identifying information is essential to the research outcomes, full consent must be sought from participants to publish such data, with full detail provided about what data will be published and how this will be done in line with GDPR regulations.

Researchers should be cautious about relying heavily on pseudonyms (eg. Participant A) without considering other identifying data that may be presented in case studies that may allow for the participant to be identified.

All participants must be informed of their right to withdraw from the study at any time and researchers should have contingency plans in place to deal with such situations.

5.6 Integrity and transparency

Researchers have an obligation to all participants to ensure full confidentiality of personal data and must take all reasonable steps to maintain the physical and electronic security of such data. Researchers must provide a full account of how they plan to collect, store and use personal data within their research as part of their ethics proposal, including how they propose to destroy data at the end of the research.

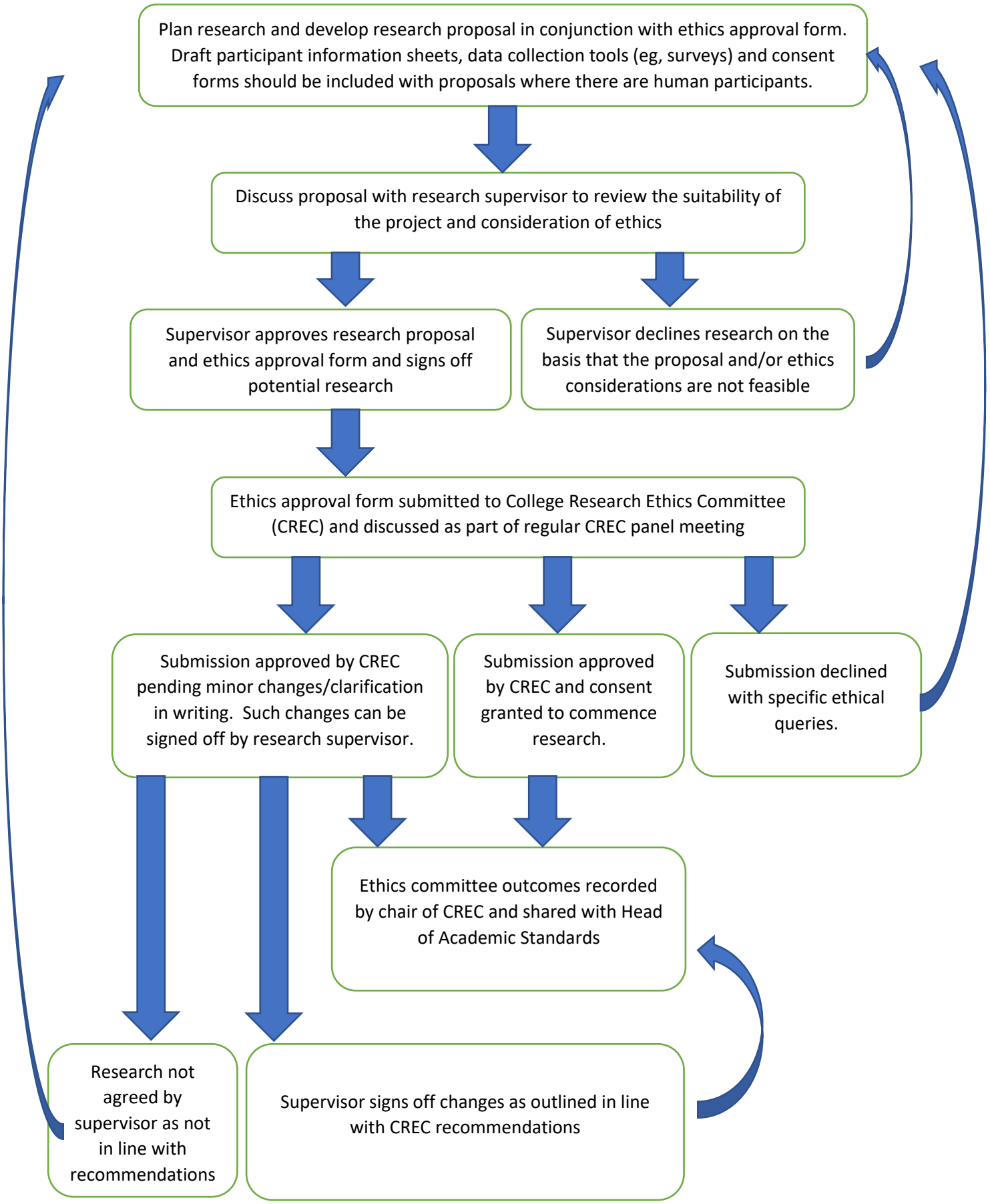
All researchers have an obligation to ensure that all data presented as part of their study is true to the best of their knowledge and sourced from reputable sources. Researchers should take to ensure that the data is conducted objectively and findings should be presented in a way that accurately represent the full range of data sourced.

5.7 Independent research which avoids conflict of interest

Researchers must ensure that the research they are conducting is fully independent and does not plagiarize on previous studies or research.

Where other parties are involved in the collection of data, such as employers or independent bodies, researchers must ensure that they are fully compliant with any regulations set out by such parties and consent is sought from all relevant parties in advance of research. Any research must be in line with the employers existing policies regarding data and research and written consent must be provided alongside the submission where this is relevant.

6. Research planning and ethics process flow



7. Consequences of non-compliance with ethics policy and process

It is the responsibility of the researcher to ensure that they have sought full approval for their research following the process outlined above. Failure to do so will make any submissions of research assessment invalid and students will receive a zero-grade outcome for such assessments.

Any researcher that conducts research activity that deviates significantly from their original proposal may also be subject to a zero grade for their assessment where the changes impact on the ethical considerations for the study. Any researcher who is in doubt of these impacts should discuss with their supervisor before making such changes. Where a change will affect the ethical nature of the study, the researcher will be required to resubmit their revised proposal through the process outlined in section 6.

8. Further information

Researchers are encouraged to visit https://ukrio.org/wp-content/uploads/UKRIO-Code-of-Practice-for-Research.pdf to review the Code of Practice for Research published by the UK Research Integrity Office. This document provides some useful guidance for researchers around the considerations for academic research.

Terms of reference for Nescot College's Research Ethics Committee are available on request from the Head of Academic Standards.

9. Appendices

9.1 NESCOT Research Project ethical approval form

This form is evidence that you have discussed and agreed your project with your research tutor. A part of the form will require you to provide some information about the research you intend to undertake. Another part will require you to demonstrate your awareness of relevant issues in the area you intend to investigate. While a final part will record your awareness of ethical issues that may arise from your research, as well as your strategies for addressing these issues. You **must** include this form in your submission and the ethics section **must** be agreed by your tutor before being submitted to an ethics panel . It is, therefore, important that you **negotiate this with your tutor as early** as you possibly can.

Student information

Name: **Proposed topic/Research question**

A brief overview

Please provide a brief overview of the topic you intend to research into. You should include a few references to the literature in order to demonstrate your awareness of development in the field.

Research methodology

Please state briefly the approach you intend to use for this research. You should briefly address your research approach (evaluative or investigative) as well as your methods of data collection (qualitative, quantitative or a mix of both).

Ethical considerations (including GDPR considerations)

In this section, please discuss ethical issues that are relevant to your investigation. If your research has to do with collecting data from human participants, then you must address these issues. You should confirm that you are familiar with GDPR regulations and have made your decisions in line with GDPR requirements.

Consider ALL elements of the following sections:

1. **Nature of data being collected and lawful basis:** Could any of the data you are collecting be considered personal data (see appendix 1)? If so, you will need to outline under which lawful basis you are collecting this information and explain how this will be explicitly conveyed/agreed with participants. (In many cases, this will be "public task" as part of academic research, however informed consent must still be provided by participants)

2. **Fairness**: Please outline considerations for the use of the proposed data. What do you plan to use it for explicitly? Could this processing have any adverse affects on the individuals concerned and how can this be justified or mitigated?

3. **Transparency:** How do you plan to be transparent with participants about how you will use their personal data? Please provide examples of any privacy notices/information notice which outline how and why the data will be used and the legal basis for the research (point 1).

4. **Storage limitation:** How long do you plan to keep any personal data collected in the research? How will this be communicated with participants? What strategies would you use to store, protect and dispose of the information you collect in the course of this research? Have you explicitly outlined to participants how they can withdraw consent should they wish?

5. **Consent:** How will participants give their "fully informed" consent to participate in the research?

6. **Anonymity:** If data has been through the process of removing both direct and indirect personal identifiers that can lead to an individual being identified, it is then considered anonymised. GDPR regulations do not apply to data that has been fully anonymised. If you plan to use anonymised data, how would you ensure that information you collect is not traceable to the individual or provider?

7. **Voluntary participation**: How would you ensure that your participants have voluntarily offered to participate and are not coerced?

Student confirmation

I _____confirm that I have discussed and agreed every section of this form with my tutor and will only conduct my research in line with what has been agreed in this document. I have read and understood the Nescot Ethics policy and agree to conduct my research in line with this policy.

Signature Date:

Tutor's confirmation

I confirm that I have discussed and agreed every section of this form with _____

Signature Date:

APPENDIX 1

What is Personal data?

- Personal data is information that relates to an identified or identifiable individual.
- What identifies an individual could be as simple as a name or a number or could include other identifiers such as an IP address or a cookie identifier, or other factors.
- If it is possible to identify an individual directly from the information you are processing, then that information may be personal data.

Note: The use of personal data should be considered for research purposes as any data collected both first hand (primary data) or though secondary sources. Any personal data used must comply fully with GDPR requirements.

What are the lawful bases for processing?

The lawful bases for processing are set out in Article 6 of the UK GDPR. At least one of these must apply whenever you process personal data:

(a) Consent: the individual has given clear consent for you to process their personal data for a specific purpose.

(b) Contract: the processing is necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract.

(c) Legal obligation: the processing is necessary for you to comply with the law (not including contractual obligations).

(d) Vital interests: the processing is necessary to protect someone's life.

(e) Public task: the processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law.

(f) Legitimate interests: the processing is necessary for your legitimate interests or the legitimate interests of a third party, unless there is a good reason to protect the individual's personal data which overrides those legitimate interests. (This cannot apply if you are a public authority processing data to perform your official tasks.)

Please remember that GDPR requirements state that you must ensure the personal data you are processing is:

- adequate – sufficient to properly fulfil your stated purpose;
- relevant – has a rational link to that purpose; and
- limited to what is necessary – you do not hold more than you need for that purpose.

SOURCE: https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/key-definitions/what-is-personal-data/

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