Introduction

1. This Research Ethics Policy seeks to ensure that any research with human participants being conducted by both the College's students and academic staff ensures the dignity, rights, safety, and well-being of both the participants and researchers.

2. Drawing on the definition put forward for the purpose of Research Excellence Framework 2014[1], research is defined as a "process of investigation leading to new insights, effectively shared". It should be understood in the broadest possible terms and includes any questionnaires, interviews, focus groups, observations, etc. Furthermore, ethical approval is needed for analysis of pre-existing data not available in the public domain that have not been fully anonymized.

3. All the College's students and permanent staff should have ethical approval prior to commencing data collection.

4. In case of an external researcher seeking to conduct research at the College's premises or recruit participant from the College's student body or permanent staff, the external researcher is required to apply for ethical approval as described in this policy or submit their ethical application that has already been approved by another institution's research ethics committee to the Research Ethics Panel for consideration. Permission from the Dean of School may also be required.

5. In case of collaborative research that includes partners from other institutions or organisations, the College's permanent staff and students must ensure that their part of research has research ethical approval. This can be acquired by applying for ethical approval as described in this policy, or submit ethical approval received from another institution's research ethics committee to the Research Ethics Panel for consideration.

Principles of Ethical Research

6. Building on Five Ethical Principles of Social Science Research adopted by Academic of Social Sciences[2] in March 2015, the College is committed to fostering a research and scholarship

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[1] REF2014 Assessment framework and guidance on submissions, REF 02.2011. page 48
[2] Academy Adopts Five Ethical Principles for Social Science Research (2015), https://www.acss.org.uk/developing-generic-ethics-principles-social-science/academy-adopts-five-ethical-principles-for-social-science-research/

environment that is inclusive of different interests, values, methods and perspectives and aims to maximise benefits for individual and society whilst minimising risk and harm.

7. When conducting research or disseminating their research, staff and students should be mindful about their social responsibilities and respect the privacy, autonomy, diversity, values and dignity of individuals, groups and communities. All research should be conducted with integrity and transparency whilst employing the most appropriate methods for the research purpose.

8. The principles of ethical research should underpin all stages of research inquiry from the selection of research methods and the recruitment of participants to analysis of data and reporting and dissemination of research findings.

9. Central elements of ethical research are informed consent, confidentiality and/or anonymity, voluntary participation and minimisation of harm to the research participants and others involved, alongside maximisation of benefits.

10. To ensure voluntary participation and informed consent researchers must inform participants of the following:

    - The objectives of the research - the purpose, nature and scope

    - What is involved in the participation (what kind of questions will be asked and how much time will it take);

    - The possible risks and benefits to the participants, if any;

    - How the information will be used from analysis to dissemination (e.g. in a publication; in coursework);

    - The degree of anonymity that can be provided to participants and explicit information on mitigation where anonymity cannot be guaranteed (e.g. anonymous reporting; fictionalised personal characteristics; non-disclosure agreements; confidentiality. See paragraph 13);

    - How to withdraw from the study and request removal of data;

    - Who will have access to the data and how it will be stored;

    - When data will be deleted when it is no longer needed.

11. This information should be provided either in a written information sheet, or in an email, and reiterated orally to participants at the start of data collection .

12. As a default, participants should be offered anonymity and/or confidentiality to ensure both the objectiveness of the study and safety of participants.

13. Where there is a possibility of identification by association or inference, this should be communicated to intended participants. All reasonable precautions to avoid identification by association or inference should be taken. This might include fictionalisation (e.g. changing any

identifiable features or information) or removal of identifiable features from data sections that are published or disseminated. To ensure that the research is conducted with integrity and transparency, all precautions taken to avoid identification should be clearly stated in the information sheet to participants and, importantly, when the research results are reported.

14. Research where the participants cannot be informed about the nature of the study prior to participating (either because the study requires elements of deception or consists in covert observation) counts as high-risk and must be considered and approved by the Research Ethics Panel.

15. Anonymity entails obligations not only for how the information provided by the participant is used in the research but also for how the secure storage of raw data and contact details is ensured.

16. All data must be handled in accordance with General Data Protection Regulation (GDPR).

Types of Ethical Research Applications

17. Pearson College distinguishes between two types of research ethics applications based on the risk the study poses to participants and researchers – low-risk and high-risk

18. Research is considered *low risk* if the following conditions are met:

    i. The data (including an audio recorded conversation) is completely anonymous with no personal information being collected (apart from name, and a record of consent);

    ii. The data is not considered to be sensitive or confidential in nature;

    iii. The issues being researched are not likely to upset or disturb participants;

    iv. Vulnerable or dependant groups are not included;

    v. There is no risk of possible disclosures or reporting obligations.

19. Research involving interviews with participants on subjects deemed to be fully within their personal and/ or professional competence is considered low risk if the five conditions listed in paragraph 18 are also met.

20. Any research is considered *high risk* if any of the following applies:

    i. Participants are under 16 years old;

    ii. Project involves participants who are vulnerable;

    iii. Participants will participate without their prior consent;

    iv. Study includes discussing personally sensitive subjects;

    v. There is a risk that due to nature of the study, the participants could disclose any illegal or harmful activity;

vi.   The study could induce psychological stress or anxiety on participants;

vii.   Project is institutional, regardless of risk level (See Paragraph 25);

21. Students and staff should use the Research Ethics Approval Checklist Tool to determine whether their research is low risk or high risk.

22. Students should discuss their research plans and risk assessment with their tutor. More complex cases where the risk-level is not immediately clear should be submitted to the Research Ethics Panel for consideration.

23. In the case of high-risk research, the risks should be measured against the possible benefits of research for individual and society; and all reasonable precautions should be taken to minimise the anticipated risk and harm. This is done through a risk assessment in which both the anticipated risk and harm and possible the benefits for individuals and society are assessed and addressed.

Research Ethics Approval Process

24. As provided in Paragraph 17 above, depending on the risk the study poses to participants and researchers, there are two routes for ethics approval: low-risk research ethics applications and high-risk ethics application. Low-risk ethics applications are, normally, assessed within the School whereas high-risk research ethics applications require approval by the Research Ethics Panel. For further information on the Research Ethics Panel assessment consult Research Ethics Panel Terms of Reference Appendix 1: Research Ethics Panel checklist for applications.

25. The exception to this rule are research inquiries that are conducted at the College level. All researcher conducted at the College level should be submitted to the Research Ethics Panel for consideration regardless the risk level.

26. Retrospective approval is not possible for any research. Ethical approval is needed before the start of data collection.

27. Any research as specified in paragraph 2 that is conducted without ethical approval will be treated as a major academic or research misconduct. The College will take no responsibility for such research and the student or member of staff could be subject to disciplinary proceedings.

28. If, after receiving approval, the research design changes substantially in a way that new ethical considerations arise, a new risk assessment as described in paragraph 21 is required, and a new application should be submitted either to Dean or Deputy Dean or the Research Ethics Panel, as appropriate to the perceived level of risk. The application should include the initial approval, a detailed explanation of how the research design has changed, and how the new ethical considerations are to be addressed in the revised research.

29. Students studying at Levels 4, 5 and 6 are not, normally, permitted to conduct high-risk research. (See also Paragraphs 35 – 37 below).

30. All students who are conducting low-risk research are required to submit a Research Ethics Approval (Low Risk) form along with any other appropriate documentation to their module tutor, as instructed. The Research Ethics Approval Forms can be downloaded from the Pearson College Online Learning Environment.

31. Students conducting high-risk research are required to submit a Research Ethics Approval form along with any other appropriate documentation to the Research Ethics Panel for their consideration prior to start of the research. The appropriate documentation is listed on the application form and includes the following; participation information sheets, consent forms, interview or focus group protocols, survey questions and any other materials given or distributed to intended participants. In all instances, students are advised to discuss their planned research with their subject tutor.

32. Ethical approval is also required for non-credit bearing research with human participants. Non-credit bearing research includes all research activities that are not part of a module or are done in addition to the required course work. Students conducting non-credit baring research are required to assess the risk level using use Research Ethics Approval Checklist Tool, as described in paragraph 21, to determine the appropriate research ethics application route. In the case of low-risk research, students are required to submit their Research Ethics Approval form along with any other appropriate documentation to their Module or Programme Leader for consideration. High-risk research applications along with any other appropriate documentation are submitted to the Research Ethics Panel for consideration.

Staff Applications

33. Permanent staff conducting low-risk research are required to submit a Research Ethics Approval (Low Risk) form along with any other appropriate documentation to the Dean or Deputy Dean for approval. In case of institution-wide low-risk project, relevant documentation should be submitted to the Deputy Vice-Principal (Academic Affairs) for approval. .

34. Permanent staff conducting high-risk research are required to submit a Research Ethics Approval (High Risk) form along with any other appropriate documentation to the Research Ethics Panel for consideration and approval. The appropriate documentation is listed in the application form and includes the following: participation information sheets, consent forms,

interview or focus group protocols, survey questions and any other materials given or distributed to intended participants.

Ethical Clearance for Level 4, 5 and 6 Modules

35. There are cases where Level 4, 5 and 6 modules include a research element, either for the purpose of students learning research techniques or for the purpose of producing a small-scale research. In these cases, module leaders must apply for ethical clearance.

36. For these modules (or groups of modules), module leaders must complete an Ethical Clearance for Level 4, 5 and 6 Modules form and submit it to the Research Ethics Panel before the start of the academic year. The purpose of this is to ensure that students at Level 4, 5 and 6 will not be conducting any high-risk research and all the assignments and assessments must reflect this.

37. The ethical clearance for Level 4, 5 and 6 modules is valid for six years. However, if a module underwent any major amendments, or minor amendments that affect assessments, a new ethical clearance form must be submitted for consideration.

Powers of Research Ethics Panel

38. The Research Ethics Panel may:
    - Approve the research ethics application.
    - Approve with minor amendments. In this case, the application is essentially ethically sound, however, minor amendments are required before full approval (normally by Chair's action)
    - Approve with major amendments. In this case, the research requires major amendments before it can be re-considered by the panel.
    - Reject the research. The proposal is deemed unethical.
    - Defer approval is cases where the REP could not reach a decision and needs to seek further advice from the Research Scholarship and Innovation Committee.
    - Pause or require amendments to already approved research on account of changed circumstances.
    - Approve ethical clearance for Level 4 and 5 modules.
    - Scrutinise ethics applications approved by another institution's research ethics committee, and either confirm or require additional assurances.

Research Ethics Records

39. Research Ethics records will be maintained by the Academic Quality Office.

40. Schools are required to submit low-risk approvals for record keeping to the Secretary of the Research Ethics Panel who shall be an Academic Quality Officer, appointed by the Deputy Vice-Principal (Academic Affairs).

41. Reports on research ethics approvals will be made to the Research Scholarship and Innovation Committee, which, in turn, will report annually to the Review and Enhancement Committee.

Person responsible	Deputy Vice Principal (Academic Affairs)
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