

# **RESEARCH ETHICS POLICY 2022-23**

## **Document Title** RESEARCH ETHICS POLICY **Document Author and Department: Responsible Person and Department:** Kate Wiseman and Kathryn Edmonds Vice-Principal (Academic) and Head of Learning Services **Approving Body: Date of Approval:** Academic Board 18th February 2022 Date coming into force: **Review Date: Edition No:** 18<sup>th</sup> February 2022 Annually 4 **EITHER** OR For Public Access? For Internal Access only? Tick as appropriate Tick as appropriate YES YES **Summary/Description:** This document defines the standards of responsible and ethical conduct expected of all persons engaged in research at All Nations Christian College including those on courses validated by The Open University. This content of this document has been drawn largely from the Oxford University Academic Integrity in Research: Code of Practice and Procedure, and the University of Greenwich Research Ethics Policy, with grateful thanks.

Sep 22: review resulting in minor amendments not requiring approval (e.g. addition of page

numbers, amendment of related policies section, amendments to nomenclature etc).

#### **ALL NATIONS CHRISTIAN COLLEGE**

To train and equip men and women for effective participation in God's mission to His multicultural world.

#### RESEARCH ETHICS POLICY

This policy must be read in conjunction with the College Academic Misconduct Policy

#### 1. CONTENTS OF POLICY

- 1. Contents of Policy
- 2. Introduction
- 3. Legislative Framework
- 4. Definitions
- 5. Ethical Research Code of Practice
- 6. Reasons for Seeking Research Ethical Review/Approval
- 7. Procedures for Applying for Research Ethical Review/Approval
- 8. Procedures for Handling Data
- 9. Intellectual Property Rights
- 10. Misconduct in Research
- 11. Complaints and Appeals
- 12. Sanctions
- 13. Roles, Responsibilities, Policy Approval and Review
- 14. Policy Communication
- 15. Related Documents
- 16. Appendices: Forms

#### 2. INTRODUCTION

- **2.1.** This Research Ethics Policy prescribe standards of responsible and ethical conduct expected of all persons engaged in research at All Nations Christian College and the consequences should non-compliance be suspected.
- 2.2. This policy has been written on the understanding that researchers recognise that academic integrity in research, as with any other academic undertaking, includes the requirement to avoid plagiarism, poor citation practice, collusion, cheating, contract cheating, or other similar offences which are explained in full in the College 'Academic Misconduct Policy'. This policy therefore, primarily focuses on the ethical issues raised by research topics which might be classified as 'sensitive', involve either human participation, a potential or actual conflict of interest for the researcher and/or any other ethical issue (See section 7 below). It also sets out the procedures which should be followed to ensure due ethical consideration when any of those situations are relevant to the research being proposed.

#### 3. LEGISLATIVE FRAMEWORK

- 3.1. All research undertaken under the auspices of the College must meet statutory requirements. Of particular relevance is the Equality Act (2010), as well as the Human Rights Act (1998), the Data Protection Act (1998), The Counter Terrorism Security Act 2015 and the requirement for Disclosure & Barring Service clearance for those working with children and provision within the existing legal framework for those working with vulnerable adults.
- **3.2.** Where applicable, researchers should comply with any research ethics guidelines set out by their professional associations, or funding bodies. This may include ethical review applications from those bodies and conformity with any other audited compliance regulations (e.g. NHS National Research Ethics Service review).

3.3. This policy contains rules and regulations of the College which have been prepared in line with Open University regulations and, where appropriate, the requirement of the Office for Students' Regulatory Framework, and the UK Quality Code for Higher Education.

#### **DEFINITIONS**

For the purposes of this policy the following definitions apply

- **4.1.** Research is defined 'the systematic investigation into and study of materials and sources in order to establish facts and reach new conclusions'.1
- 4.2. Researchers are defined as all students, members of staff, including those members of the College who are conducting research overseas, and those who are not members of the College but who are conducting research on College premises or using College facilities. It applies to both research conducted by staff on behalf of the College, and personal research undertaken by staff and others visiting or working at the College (e.g. external Library users and other users of the College site). Finally, it also applies to student's examined work i.e. the submission and assessment of a thesis, dissertation, essay, extended arts project or other coursework that is undertaken in formal examination conditions and is a requirement for, counts towards or constitutes the work for a degree or other academic award.

#### 4.3. Misconduct in Research:

- **4.3.1.** Misconduct in Research is defined as "actual or attempted acts of fabrication, falsification, plagiarism or deception when proposing, conducting or reporting results of research, or deliberate, dangerous, reckless or negligent deviations from accepted practices in carrying out research. It includes failure to follow established protocols if this failure results in unreasonable risk or harm to humans or the environment, and facilitating of Misconduct in Research by collusion in, or concealment of, such actions by others. It also includes the intentional or reckless unauthorised use, disclosure or removal of, or damage to, researchrelated property of another, including apparatus, materials, writings, data, hardware or software or any other substances or devices used in or produced by the conduct of research "2
- **4.3.2.** Misconduct in Research does not include "honest error or honest differences in the design, execution, interpretation or judgement in evaluating research methods or results, or misconduct unrelated to the research process".3
- **4.4.** Supervisors are defined as those designated with the specific responsibility for supporting the researcher during the research process, as outlined in 6.2 below.
- **4.5.** Participants are defined as those who aid the researcher in obtaining their research data by, for example, completing questionnaires, allowing themselves to be observed, and/or be interviewed etc. See 7.2 below.

#### 5. ETHICAL RESEARCH CODE OF PRACTICE

- **5.1.** The College therefore expects all **researchers** to observe the highest standards of ethics and integrity in the conduct of their research. In seeking to achieve such high standards, researchers have a responsibility to:
  - **5.1.1.** always consider and manage the real, perceived or potential ethical implications of their research, following the procedures in this document or those of other relevant authorities. Researchers therefore have an obligation to ensure that research is conducted in accordance with the College's Code of Conduct and in compliance with the law.

<sup>1 &</sup>quot;Research," Oxford English Dictionary <a href="https://en.oxforddictionaries.com/definition/research">https://en.oxforddictionaries.com/definition/research</a>

<sup>&</sup>lt;sup>2</sup> http://:www.admin.ox.ac.uk/personnel/cops/researchintegritv/#d.en.54059

<sup>&</sup>lt;sup>3</sup> Ibid.

- **5.1.2.** demonstrate integrity and professionalism, fairness and equity, and intellectual honesty; they should therefore be honest in proposing, conducting and reporting research; maintaining independence and impartiality in obtaining and handling data, the accuracy and reliability of research data and results and acknowledge the contributions of others when publishing and disseminating results and neither engage in misconduct nor conceal it;
- 5.1.3. acquaint themselves with guidance as to best research practice and standards of integrity. For example, they have an obligation to acquaint themselves with this and other relevant policies and procedures designed to ensure their research is ethically sound. They should also acquaint themselves with The UK Research Integrity Office: UKRIO Code of Practice for Research: Promoting Good Practice and Preventing Misconduct (2009);
- **5.1.4.** comply with ethical and legal obligations as required by all relevant statutory and regulatory authorities, including seeking ethical review and approval for research projects as appropriate. They should ensure that any research undertaken complies with any agreements, terms and conditions relating to the research. For example, they should follow the requirements and guidance of any professional bodies in their field of research and those of the body regulating their profession if they are a member of a regulated profession.
- **5.1.5.** as far as possible, ensure the health, safety and well-being of all those associated with the research. They have a responsibility therefore to seek to ensure the safety, dignity, wellbeing and rights of all those associated with the research, including the researcher, other participants, and risk of harm to the environment. This includes emotional and mental distress and possible damage to financial and social standing, as well as to physical harm;
- **5.1.6.** obtain informed consent by all participants. Sufficient information should be given to participants to ensure that they understand what the research involves, procedures to ensure confidentiality and understand that they can withdraw from participating in the research at any point;
- **5.1.7.** maintain confidentiality of information supplied by research participants and anonymity of respondents (unless explicit consent is given to the contrary);
- **5.1.8.** ensure that research should conform to Data Protection legislation and the College (or any other relevant authority) <u>Data Protection Policy</u>, concerning the storage, sharing and disposal of personal data obtained during research (see section 9).
- **5.1.9.** effectively and transparently manage any conflicts of interest, whether actual or potential, reporting these to the appropriate authority as necessary;
- **5.1.10.** recognise their accountability to the supervisor, participants and the College for the conduct of their research;
- **5.1.11.** report any well-founded allegations of misconduct in research, whether witnessed or suspected.
- **5.2.** The College expects all <u>supervisors</u> to observe the highest standards of ethics and integrity in supporting others in their research. In seeking to achieve such high standards supervisors have a responsibility to:
  - **5.2.1.** provide adequate and timely support within the time frames required by the College; After being allocated a supervisor, BA students are entitled to a minimum of 3 hours supervision support. After the confirmation of the research title, MA students are entitled to 6 to 8 sessions of supervision up to a maximum of 8 hours.
  - **5.2.2.** assist the researcher to: manage the potential ethical implications of their research and to follow the procedures in this document or those of other relevant authorities;

- **5.2.3.** offer the researcher advice on how to follow best research practice and maintain standards of integrity in all aspects of their research;
- **5.2.4.** provide broad guidance to students in such areas as: how to focus on the proposed topic, structure and organise the research, and employ the most appropriate methodology;
- **5.2.5.** Consult other tutor's help, as appropriate;
- 5.2.6. monitor the researcher's compliance with ethical and legal obligations as required by all relevant statutory and regulatory authorities and those of any relevant professional body;
- **5.2.7.** as far as possible, ensure the health, safety and well-being of the researcher and themselves (see 6.1.5 above)
- **5.2.8.** maintain the anonymity of information about research participants and other subjects of research e.g. organisations, divulged in the course of their supervision;
- **5.2.9.** ensure their own records on research supervision conform to Data Protection legislation and the College <u>Data Protection Policy</u>, concerning the storage, sharing and disposal of personal data obtained in carrying out their supervisory role;
- **5.2.10.** declare to the Vice-Principal (Academic) any personal conflicts of interest that may arise, in carrying out their supervisory role;
- **5.2.11.** be alert to, and if appropriate report, any allegations of misconduct in research, whether witnessed or suspected;
- **5.2.12.** be accountable to their programme leader and/or the Vice-Principal (Academic) in carrying out their supervisory role.
- 5.3. <u>The College</u> accepts that it has an obligation to ensure that all research carried out under the scope of this policy achieves the highest standards of ethics and integrity, wherever possible and commits itself to ensuring:
  - **5.3.1.** there are sufficient learning resources (e.g. teaching, library and IT resources) to foster a positive research culture at the College;
  - **5.3.2.** that student researchers are equipped with the research skills needed, including an understanding of: research ethics, health and safety and appropriate use of IT;
  - **5.3.3.** that supervisors are equipped with the research supervision skills needed, including ethical scrutiny skills;
  - **5.3.4.** that students (and staff, when appropriate for their professional development) are suitably supervised by appropriately qualified and experienced people;
  - **5.3.5.** that it has procedures in place to ensure best research practice and standards of integrity are upheld;
  - 5.3.6. that it has policies and procedures in place to ensure that all research undertaken under the auspices of the College meets statutory requirements. Of particular relevance for research is the Equality Act (2010), as well as the Human Rights Act (1998), the Data Protection Act (1998), The Counter Terrorism Security Act 2015 and the requirement for Disclosure & Barring Service clearance for those working with children and provision within the existing legal framework for those working with vulnerable adults;
  - **5.3.7.** that policies and procedures are in place to ensure, as far as possible, the health, safety and well-being of the researchers and supervisors:
  - **5.3.8.** that it will investigate all accusations of academic misconduct fairly and in a timely manner in accordance with its 'Academic Misconduct Policy':
  - **5.3.9.** that it is accountable to the Academic Board, the Board of Trustees and other relevant regulatory bodies for the effective implementation of this policy.

- **5.4. Handling of Data:** The College expects all those who handle data in the course of their research to adhere to the following code of practice:
  - **5.4.1.** The College, supervisors and researchers should collect data accurately, efficiently and according to the agreed design of the research project, and ensure that it is stored in a secure and accessible form, in compliance with all legal, ethical or research-funder requirements, especially data protection legislation.
  - **5.4.2.** The College, supervisors and researchers should maintain the confidentiality of those providing data where undertakings have been made to third parties e.g. human participants.
  - **5.4.3.** The College, supervisors and researchers should respect and protect the intellectual property rights of all third parties.
  - **5.4.4.** The authorship of all third-party data should be acknowledged and correctly cited in accordance with the College's Citation Guide (students and staff) or in the case of visitors an equivalent approved referencing system.
  - **5.4.5.** Researchers should follow College procedures on the accurate and efficient collection of sensitive and non-sensitive data, its storage in a secure and accessible form (see section 9). Research supervisors, the ILS Team and the College Librarian should be available to offer advice on data handling to students, staff and visitors respectively.
  - 5.4.6. If research data is to be deleted or destroyed, either because its agreed period of retention has expired or for legal or ethical reasons, it should be done so in accordance with College procedures (see section 9) and/or any other legal, or research funder requirements and with particular concern for confidentiality and security.
  - **5.4.7.** See section below on Data Handling procedures.

#### 6. REASONS FOR SEEKING RESEARCH ETHICAL REVIEW/APPROVAL

The ethical review and approval process enables provision to be put in place to mitigate risks generated by undertaking the research. Any research involving the following (or involving any other real, perceived or potential ethical risk not listed here) requires ethical consideration and ethical approval must be sought.

#### 6.1. Sensitive Research:

- **6.1.1.** Sensitive research encompasses a wide variety of research topics, but there are three broad research areas which would usually cause the research to be classified as 'sensitive':
  - research into illegal activities, including the collection of source data, e.g. crime statistics:
  - research that requires access to web sites normally prohibited on College servers; including, but not limited to; pornography, or the sites of any of the organisations proscribed by the UK Government;
  - research into extremism and radicalisation.
- **6.1.2.** Sensitive research should be initiated and continued only if the anticipated benefits justify the risks involved.
- **6.1.3.** The College does not permit any illegal activities in the course of research. However, it recognises that there is a fine line between what might be deemed to be illegal and what is legal but potentially unsafe. Therefore, each research project which comes in this category will be carefully considered and its legality assessed before permission is given to proceed. Whilst the College endorses the principle of academic freedom and supports its researchers in undertaking ambitious, rigorous, and challenging

research (see the College 'Freedom of Expression and Academic Freedom Code of Practice'), it has a legal obligation to monitor all research and to report illegal activity where appropriate. Conversely, in order to protect researchers from misinterpretation of intent by authorities and subsequent investigations, any researcher engaged in sensitive research must follow the procedures in section 7 so that the College can consider putting specific protocols in place to mitigate risks to all involved in such research. It also enables the College to explain to outside authorities, if required, that researchers are engaged in authorised research work.

- 6.1.4. Similarly, the College takes seriously its duty, under the Security and Counter Terrorism Act 2015 to duty to have due regard to the need to prevent people from being drawn into terrorism on its campus (see the College 'Safeguarding Policy'), whether by oral, visual, written or other means. "Researchers should be aware that extremist and terrorist-related websites may be under surveillance by law enforcement agencies. Visiting such websites and/or downloading security-sensitive materials, particularly if they are terrorism-related, can be viewed by them as prosecutable offences if it is considered that the intent is illegal." Therefore, in order to protect researchers from misinterpretation of intent by authorities and subsequent investigations, the researcher must follow the procedures in section 7 so that the College can consider putting specific protocols in place to mitigate risks to all involved in such research. It also enables the College to explain to outside authorities, if required, that researchers are engaged in authorised research work.
- **6.1.5.** The Programme Leader, together with the Head of Learning Services will approve all sensitive research undertaken in consultation with other members of the relevant programme team. Where sensitive research is approved, the Learning Services Team will support the supervisor in managing all ethical considerations.

#### 6.2. Human participation:

- **6.2.1.** Human participation is defined as: direct involvement through non-invasive procedures, such as interviews, questionnaires, surveys, observation; indirect involvement through access to personal information; and/or involvement requiring consent on behalf of others, such as by parents for a child participant under the age of 18 or a carer for a vulnerable adult e.g. elderly people, physically or mentally ill people, people with learning difficulties, people in care, bereaved people and people in prison.
- **6.2.2.** The process of applying for research ethical review/approval, as outlined in section 8, allows the researcher and the College to consider whether the research has the potential to harm the dignity, rights, safety and/or wellbeing of any of the human participants including themselves or the environment.
- **6.2.3.** Research involving human participants should be initiated and continued only if the anticipated benefits justify the risks involved.

#### 6.3. Conflict of Interest:

- **6.3.1.** Conflict of interest is defined as research in which financial or other personal considerations may compromise, or have the appearance of compromising, a researcher's professional judgment in conducting or reporting research.
- **6.3.2.** The College and researchers must comply with all legal and ethical requirements relevant to their study. They should declare any potential or actual conflicts of interest relating to research and where necessary take steps to declare and resolve them through the procedures in section 7 below.

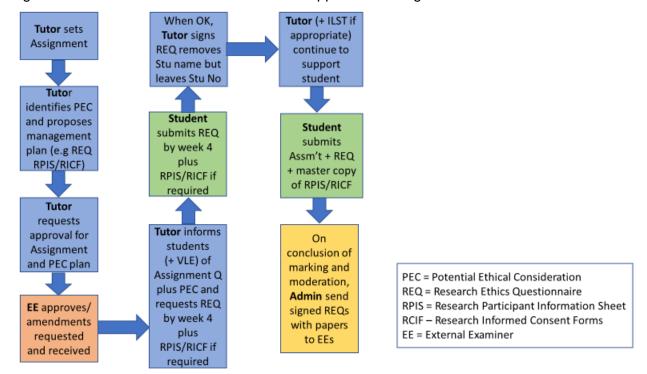
<sup>4</sup> http://www.open.ac.uk/research/ethics/sites/www.open.ac.uk.research.ethics/files/files/ecms/webcontent/Terrrorism-related-policy-FINAL.pdf

**6.3.3.** Whilst studying at the College, students should not conduct any research for commercial gain.

#### 7. PROCEDURES FOR APPLYING FOR RESEARCH ETHICAL REVIEW/APPROVAL

**7.1.** Procedure for BA, MA and en route Assignments (excluding specific research papers and projects):

Fig1: Procedure for Research Ethical Review/Approval of Assignments

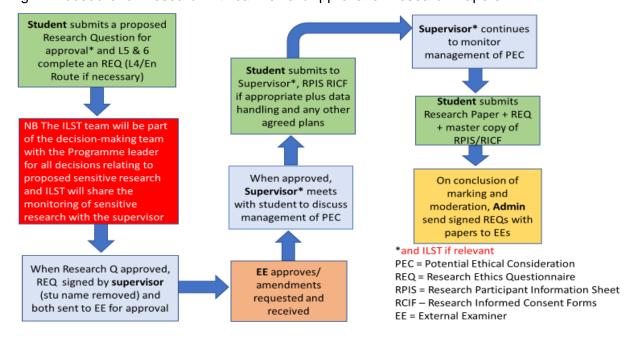


- **7.1.1.** It is the module tutor's (or *en route* course tutor's) responsibility to identify any potential ethical considerations when setting assignments and putting put a management plan in place to mitigate risks. However, students should also be aware of any potential ethical considerations in all of their academic work.
- 7.1.2. At the start of every term, module tutors should submit their assignment questions to the external examiners together with a statement declaring any potential ethical risk posed by the question and how they propose to mitigate the identified risk(s), where relevant. Action to do so would include as a minimum requirement: that each student complete a Research Ethics Questionnaire (REQ) by week 4 of the relevant term and be given guidance on how to manage their research ethically and safely. This plan may also involve meeting individually with students as necessary.
- **7.1.3.** When giving the students the approved assignment questions, the module tutor will, where relevant, highlight on the Campus and e-Learning VLEs the ethical risks and tell students they must submit a completed REQ to them by week 4. On receipt of this, the module tutor will meet with the student (s) to check that the REQ has satisfactorily identified the risks, outlined a proposed plan to mitigate them is satisfactory and that they intend to complete the *Research Participant Information Sheet/Research Informed Consent Forms*(RPIS/RICF) if their research involves human participants. (see 7.2 above)
- 7.1.4. When satisfied, the tutor (or Programme Leader on behalf of the will grant approval by signing the REQ and remove the named section of the form, (leaving just the student number visible), before returning the form to the student. The Learning Services Team will be part of the decision-making team with the Programme leader

- for all decisions relating to proposed sensitive research and Learning Services Team will share the monitoring of sensitive research with the supervisor.
- **7.1.5.** The tutor will continue to support the student(s) as necessary throughout the research process, in conjunction with the Information and Learning Services (ILS) Team, as appropriate.
- **7.1.6.** When submitting the assignment for marking, the signed REQ and a master copy of any RPIS/RICF must be attached to the completed assignment. The completed RICFs should be stored safely by the student and destroyed as para. 9.5 and 9.8.
- **7.1.7.** All sample papers sent to the external examiners for external scrutiny must be accompanied by the signed REQ.

#### 7.2. Procedure for BA and en route Research Papers and Projects

Fig 2: Procedure for Research Ethical Review/Approval of Research Papers



- 7.2.1. All BA students are required to engage in undergraduate level research as part of their studies and to follow the policy and procedures outlined in this document when working on them. Information regarding all the processes and procedures involved can be found in the UG Handbook and this policy and procedure and there is teaching about research ethics as part of study skills sessions. Students are expected to read, engage with and follow the guidance provided as part of the research process.
- 7.2.2. All BA students are required to engage in undergraduate level research as part of their studies and to follow the policy and procedures outlined in this document when working on them. Information regarding all the processes and procedures involved can be found in the UG Handbook and this policy and procedure and there is teaching about research ethics as part of study skills sessions. Students are expected to read, engage with and follow the guidance provided as part of the research process.
- **7.2.3.** All BA students are required to engage in undergraduate level research as part of their studies and to follow the policy and procedures outlined in this document when working on them. Information regarding all the processes and procedures involved can be found in the UG Handbook and this policy and procedure and there is teaching about research ethics as part of study skills sessions. Students are

- expected to read, engage with and follow the guidance provided as part of the research process.
- **7.2.4.** Students are responsible for the contents of their research and for ensuring that their research findings are presented in the format required by the College.
- **7.2.5.** It is the student's responsibility to identify any potential ethical issues considerations when selecting a research topic and, during this process, they must consider how to mitigate and manage potential risks involved. The Research Proposal form contains a prompt to begin this process from the start of their project.
- **7.2.6.** All level 5 and 6 students must complete an REQ regardless of the nature of their research and submit it with their research proposal. All other students only need to complete an REQ if required by their personal tutor (level 4) or course tutor (*en route*).
- 7.2.7. On receipt of the proposal form, the relevant programme team will consider the potential ethical issues related to the proposed research as part of the approval process. The Head of Learning Services will be part of the decision-making team with the Programme leader for all decisions relating to proposed sensitive research and Learning Services Team will share the monitoring of sensitive research with the supervisor.
- **7.2.8.** All students undertaking research projects will be assigned a research supervisor. In the case of *en route* students, this will be the course leaders; Level 4 students will be supervised by their personal tutors. Level 5 students will be supervised by a tutor with subject expertise and 6 students will have an assigned supervisor.
- **7.2.9.** The purpose of research supervision is to provide guidance to students on how to focus on the proposed topic, structure and organise the research, and employ the most appropriate methodology. The designated supervisor should also assess, advise the student on their approach to risk management and ensure satisfactory progress is made.
- 7.2.10. On receipt of the student's Research Proposal and REQ, the research supervisor will meet with the student to satisfy themselves that the student has considered all potential ethical risks involved (see section 7), their plan to mitigate them is satisfactory and to confirm that the student will utilise an RPIS and RICF forms for research involving human participants. When satisfied, the tutor will grant approval by signing the REQ and remove the named section of the form, (leaving just the student number visible), before returning the form to the student. The REQ should be approved by the research supervisor before the research commences.
- **7.2.11.** The research proposals and REQs must be approved by the external examiners.
- **7.2.12.** If students make any changes to the title or topic of an already approved research proposal, they must complete and submit the 'Change of Research Title/Topic Application Form' to the Undergraduate Programme Leader, signed by them and their supervisor. This should be done by the end of week 7, term 2 (level 4 and 6; for level 5 students his is agreed on an individual basis).
- **7.2.13.** Students can expect to have at least 3 hours supervisory time with their supervisor during the course of their research to discuss any issues, to check their research is being conducted safely and to assess their progress and performance. If students feel that they do not get adequate support and supervision, they are encouraged to discuss their concerns with the Undergraduate Programme Leader.

- **7.2.14.** The research supervisor must continue to support the student(s) as necessary throughout the research process; this will include monitoring the researcher's approach to risk management. The ILS Team are available as an extra source of advice.
- **7.2.15.** It is the responsibility of the student to submit a revised or additional REQ and/or RPIS/RICF, if relevant.
- **7.2.16.** When submitting the research paper for marking, the signed, completed REQ and a master copy of any RPIS and RICF must be inserted inside the completed assignment.
- **7.2.17.** All students are required to fill out and submit a Research Module Evaluation Form and a Research Supervision Record at the end of their research, reflecting their experience of research orientation sessions, supervisory meetings and guidance.

#### 7.3. Procedure for MA Dissertation and Practice-based Research Project/Dissertation

- 7.3.1. All MA students are required to engage in postgraduate level research as part of their studies and to follow the policy and procedures outlined in this document when working on MA dissertations and Practice-based Research Project/Dissertations. Information regarding all the processes and procedures involved in the MA Dissertation module is found in the postgraduate Dissertation Module Handbook and there is teaching about research ethics as part of the Module. Students are expected to read, engage with and follow the guidance provided as part of the dissertation/Practice-based Research Project/Dissertation process.
- **7.3.2.** Students are responsible for the contents of their research and for ensuring that their research findings are presented in the format required by the College.
- **7.3.3.** Having initially read the research ethics materials and attended taught sessions on research ethics, students should discuss with their supervisor (and relevant experts, where appropriate) any potential ethical issues raised by their proposed research and complete an REA form to indicate what they are and how to manage the risks; this is confirmed by the Supervisor.
- **7.3.4.** The Head of Learning Services will be part of the decision-making team with the Programme leader for all decisions relating to proposed sensitive research and Learning Services Team will share the monitoring of sensitive research with the supervisor.
- **7.3.5.** The research supervisor will meet with the student to satisfy themselves, as part of the proposal process, that the REA is satisfactory and to confirm that the student will utilise an RPIS and RICF forms for research involving human participants. The REQ should be approved by the research supervisor before the research commences.
- **7.3.6.** The research proposals and REA form must be approved by the external examiners
- **7.3.7.** The research supervisor must continue to support the student(s) as necessary throughout the research process; this will include monitoring the researcher's approach to risk management. The ILS Team are available as an extra source of advice. However, the onus is upon the student to ensure that their research is carried out in accordance with ethical requirements and the terms of this policy
- **7.3.8.** It is the responsibility of the student to submit a revised or additional REQ and/or RPIS/RICF, if relevant.

- **7.3.9.** When submitting the proposal for marking, the signed, completed REQ must be inserted inside the completed assignment and a master copy of any RPIS and RICF should form part of the appendices. This will be forwarded with the dissertation, as appropriate.
- **7.3.10.** All students are required to fill out and submit a Research Module Evaluation Form and a Research Supervision Record at the end of their research, reflecting their experience of research orientation sessions, supervisory meetings and guidance.

#### 7.4. Procedures for Staff

- 7.4.1. When using the College facilities and/or resources to carry out research on behalf of another institution or body, the College expects all staff members to have gone through a process of Research Ethical Review with that institution or body. Permission to use the College facilities and/or resources for such a purpose is given on this basis and a copy of any Ethical approval form should be given to the Vice-Principal (Academic).
- **7.4.2.** In the case of research for professional development, staff members should follow the principles and procedures of this document by obtaining ethical approval from their line manager in consultation with the Vice-Principal (Academic).
- **7.4.3.** In the case of research for personal enrichment, staff members should be aware at all times of any potential ethical implications of their research and arrange appropriate supervision where necessary (see section 7 particularly above). They may ask the ILS Manager for advice but they are not obligated to put supervision in place, this must be arranged by the staff member for themselves.
- **7.4.4.** Staff must consult the ILS Manager and the Vice-Principal (Academic), in all cases, if they are researching a sensitive issue that has the potential to be viewed as criminal. The Vice-Principal (Academic) will approve a suitable management and monitoring plan to ensure the protection of the researcher and the College.

#### 7.5. Procedures for Visitors

- **7.5.1.** When using the College facilities and/or resources to carry out research on behalf of another institution or body, the College expects all visitors to have gone through a process of Research Ethical Review with that institution or body. Permission to use the College facilities and/or resources for such a purpose is given on this basis and a copy of any ethical approval form should be given to the ILS Manager via the College Librarian.
- **7.5.2.** In the case of research for personal enrichment, visitors should be aware at all times of any potential ethical implications of their research and arrange appropriate supervision where necessary (see section 7 above).
- **7.5.3.** Visitors must consult the College Librarian if they are researching a sensitive issue that has the potential to be viewed as criminal. The Librarian will consult with the ILS Manager to ensure a suitable management and monitoring plan has been put in place to ensure the protection of the researcher and the College.

#### 8. PROCEDURE FOR HANDLING DATA

- **8.1. Start of Process**: Researchers should first consider how data will be gathered, analysed and managed and how and in what form relevant data will eventually be made available to others. Their research supervisor and the ILS Manager can offer advice on this.
- **8.2. Accuracy**: Researchers should consider how to maintain the data's accuracy e.g. note any changes of address of participants. If there is any doubt about the accuracy of personal or other data then it should not be used.
- **8.3. Consent:** Researchers must give any human participants an RPIS and ask them to sign the RPIC form to indicate consent and to assure them that their data will be kept confidential and stored securely. No participant should be included in the research unless they have their given consent on the RPIC
- **8.4. Individual Rights:** When preparing reports or appending notes to official documents, bear in mind that individuals have the right to see all personal data and could therefore read any 'informal' comments made about them. Also be aware that this includes e-mails containing personal data and so the same caution should be used when sending e-mails.

Sensitive data and Security: Any data, files or other digital or electronic items including audio or video material used or produced in the course of gathering sensitive material must be stored appropriately. Researchers must keep all personal data as securely as possible (e.g. in lockable filing cabinets or in rooms that can be locked when unoccupied). They should not leave records containing personal data unattended in offices or areas accessible to the members of the public. They should ensure that personal data is not displayed on computers screens visible to passers-by. They should be aware that these security considerations also apply to records taken away from the College e.g. on a laptop to another destination. They should also bear in mind that e-mail is not necessarily confidential or secure so should not be used for potentially sensitive communications.

The Terrorism Act 2006 and the Counter-Terrorism and Security Act 2015 outlaw the dissemination of terrorist publications if the individual concerned has the intention to encourage or induce others. Therefore, particular care must be taken to look after research data and materials that fall into this category and any other potentially criminally sensitive material appropriately (see 7.1), and dissemination should be avoided wherever possible. Physical materials such as manuals, reports or other hard copy documents should be scanned and uploaded to a secure area, and the original hard copy then destroyed. If this is not possible then the material should be kept in a locked filing cabinet or similar.<sup>5</sup>

- **8.5. Review files:** Researchers should only create and retain personal data where absolutely necessary. They should securely dispose of or delete any personal data that is out of date, irrelevant or no longer required. It is good practice to hold regular reviews of files and discard unnecessary or obsolete data systematically. (See 1.7).
- **8.6. Retention:** Subject to any legal, ethical or other requirements, data should be kept intact for any legally specified period and otherwise for the following length of time from the end of the project: 1 year for *en route* and levels 4 and 5; 2 years for level 6; 3 years for MA students.
- 8.7. Disposal of records: When discarding paper records that contain personal data, they should be treated confidentially (i.e. shred such files rather than disposing of them as waste paper). Similarly, any unnecessary or out-of-date electronic records should be deleted. Computers should not be given away or sold unless Information and Learning Services have ensured that all information stored on it has been removed or deleted.
- **8.8. Third Parties:** Personal data should never be revealed to third parties without the consent of the individual concerned or other reasonable justification. This includes parents, guardians,

-

<sup>&</sup>lt;sup>5</sup> Ibid

relatives and friends of the data subject who have no right to access information without the data subject's consent. Personal data can only be legitimately disclosed to third parties for purposes connected with a student's studies and to meet statutory or legal requirements, but only where the College is satisfied regarding the enquirers' identity and the legitimacy of the request. Researchers should also maintain confidentiality where undertakings have been made to other third parties, organisations or to protect intellectual property rights.

**8.9. Worldwide Transfer:** Researchers must always obtain specific consent from the individual's concerned before placing information about them on the Internet (apart from basic office contact details) and before sending any personal data outside the European Union, Iceland, Lichtenstein or Norway.<sup>6</sup>

#### 9. INTELLECTUAL PROPERTY

- 9.1. The College recognises the rights of its students to ownership of copyright and other intellectual property rights in books, articles, art works, musical compositions, and other publications derived from work undertaken during their studies. However, if a student is commissioned and/or paid for the creation/design of such a publication on behalf of the College, the intellectual property would be agreed by prior arrangement.
- **9.2.** The College expects to be able to use and reproduce such materials within the College for educational and research purposes, including hosting in an online repository. Prior permission from the student would be sought and the work would be either attributed or not attributed to them according to their wishes.
- **9.3.** If any reference is made to All Nations Christian College in published material by a student, the College expects to be informed in advance to ensure that the reputation of the College is protected.
- **9.4.** Research undertaken by external Library users belongs to the author.
- **9.5.** For full details of research undertaken by staff, please see the College Intellectual Property Policy in the Staff Handbook.

#### 10. MISCONDUCT IN RESEARCH

- **10.1.** Failure to comply with the Ethical Research Code of Practice (section 5) may give rise to an allegation of Misconduct in Research (see para. 5.3).
- **10.2.** Suspicions reported in confidence and in good faith will not lead to disciplinary proceedings against the person making the complaint. In the event, however, of a frivolous, vexatious and/or malicious allegation the complainant may be liable for disciplinary investigation and action.
- **10.3.** Prior to making any formal allegation, sources of advice and support for:

### Students, include:

- Head of Learning Services
- Research Supervisors
- Personal Tutors
- Module Tutors
- Programme Leaders
- Vice-Principal (Academic)

<sup>&</sup>lt;sup>6</sup> Section 9 is taken almost completely from http://www.staffs.ac.uk/legal/privacy/10\_rules/

#### Members of staff, include:

- Line –manager
- Vice-Principal (Academic)

#### **Visitors**, include:

- Research supervisors
- Researchers' own research support network
- Head of Learning Services
- The College Librarian
- **10.4.** Depending on the party being accused of Misconduct in Research, the following procedures will be followed:
  - The College Academic Misconduct policy and procedure will be used for students of the College.
  - the Staff Disciplinary procedure will be used for staff members
  - In the case of Visitors, the Vice-Principal (Academic) or his representative will contact the visitor's supervisor and/or the university which will be validating their research, so that they can initiate their own investigation. The College will facilitate but not usually lead such an investigation unless mutually agreed by all parties, in which case the procedure to be used will be agreed at that time.
- **10.5.** When an investigation has taken place using a College procedure, the basis for reaching a conclusion that an individual is responsible for Misconduct in Research relies on a judgement that there was an intention to commit the Misconduct in Research and/or recklessness in the conduct of any aspect of a research project.

#### 11. COMPLAINTS AND APPEALS

- **11.1.** Should a student who has been investigated by the College for an accusation of academic misconduct feel the outcome of the investigation was unreasonable, they may appeal using the College Academic Appeals Policy.
- 11.2. All other persons covered by this Code, should discuss the matter initially with the member of College personnel who has been dealing with the accusation. Should they feel the matter still to be unsatisfactory, may take more formal action by making a formal complaint by using the 'Complaints Policy' which is available from the College General Administrator at info@allnations.ac.uk

#### 12. SANCTIONS

- **12.1.** If proven, Misconduct in Research will usually be a ground for disciplinary action. Sanctions will be outlined in the procedure used for the investigation.
- **12.2.** Any investigation panel may also determine:
  - **12.2.1.** To notify others who have a legitimate interest in the outcome of the procedure. Such notification could include:
    - Notifying other third parties who are deemed to have a legitimate interest in the outcome of the proceedings, including, for example the co-authors of the Respondent in a manuscript subject to an allegation of Misconduct in Research.

- Notifying the publisher of a manuscript that was subject to an allegation of Misconduct in Research in order that this can be retracted or corrected.
- Notifying any funding body which has supported the research in question.
- Notifying the College Prevent Lead of any concerns in relation to vulnerable adults being drawn into reportable activity according to the Security and Counter Terrorism Act 2015. The Prevent Lead will follow College procedures as outlined in the College <u>Safeguarding Policy</u> and, where appropriate, the police and/or other authorities will also be informed.
- Notifying any regulatory or other agencies as required by law.
- Notifying any other organisation involved in the research (including other employing organisations).
- **12.2.2.** to curtail or refuse the individual's continued use of the College's premises and facilities.
- **12.2.3.** to pursue, if applicable, the recovery of any costs for damage etc incurred to College property.
- **12.2.4.** to consider whether to recommend that the College reviews training and/or supervisory procedures for research.

#### 13. ROLES, RESPONSIBILITIES, POLICY APPROVAL AND REVIEW

- **13.1.** The **Board of Trustees** have legal oversight and responsibility for all College policies, but have delegated to the Academic Board the authority to ensure fit-for-purpose policies and procedures related to academic provision are in place. The **Board of Trustees** are responsible for ensuring:
  - Academic provision at the College is adequately resourced.
  - They receive details from the **Vice-Principal (Academic)** of any serious incident or one which could be of reputational risk to the College which should be reported to either the Open University, the Office for Students and/or the Charity Commission.
- **13.2.** The **Academic Board**, who is also authorized by the Open University through its accreditation process, acts on behalf of the **Board of Trustees** on all academic matters. They are responsible for:
  - Ensuring that the academic activities of the College support its mission statement and values.
  - Ensuring that a fit-for-purpose research ethics policy is approved by them and complies with all relevant legislation and regulations (e.g. the regulations of The Open University).
  - Overseeing the effective implementation of this policy and ensuring it is satisfactorily managed.
  - Ensuring that the principles of this policy are:
    - Considered when managing and planning academic matters in line with the strategic direction of the College.
    - Reviewed by exploring what can be learned from appeals/complaints when they occur.
    - Reviewed in consultation with academic staff, students and The Open University, as a means of constantly seeking to improve the College's academic provision.
  - Ensuring they receive details from the Vice-Principal (Academic) of reported incidents
    and outcomes of cases (particularly where a significant impact on someone has
    occurred or lessons need to be learned), or details of a serious incident or one which
    could be of reputational risk to the College.

- **13.3.** The **Head of Learning Services** and the **Quality Assurance Committee** are jointly responsible for the annual monitoring and review of this policy and recommending approval to the Academic Board for all changes.
- 13.4. The Vice-Principal (Academic), Programme Leaders, Module Tutors and Research Supervisors are responsible for:
  - Overseeing the monitoring of ethical research which takes place at the College.
  - Ensuring that researchers and supervisors comply with this policy.
- **13.5.** The Vice-Principal (Academic) and the Head of Learning Services are responsible for ensuring that:
  - researchers, module tutors and research supervisors comply with this policy.
  - sensitive research is being monitored carefully and, as far as possible, all risks are mitigated.
- **13.6.** The Vice-Principal (Academic) is responsible for providing leadership for all academic provision of the College and for leading the college's research ethics' policy and practice by:
  - Monitoring the approval of ethical research and the complaints and appeals process.
  - Ensuring that decision making complies with College and Open University regulations and is applied consistently across academic provision.
  - Reporting to the Academic Board and Senior Leadership Team incidents and outcomes of cases (particularly where a significant impact on someone has occurred or lessons need to be learned), or details of a serious incident or one which could be of reputational risk to the College.
  - Ensuring the College and its staff comply with any appeals process undertaken by an outside agency (e.g. The OU or the OIA).
- **13.7.** The **Programme Leaders** are responsible for managing the approval process for ethical research and any complaints and appeals arising from it.
- **13.8.** Specific Roles and Responsibilities for **researchers** (e.g. staff, visitors or students), **research participants, supervisors** and **external examiners** are set out in Sections 5 and 7 of this policy.
- **13.9.** The **Student Academic Representatives** are responsible for:
  - Raising academic issues on behalf of their cohort with the Vice-Principal (Academic).
  - Reporting back to their cohort on the resolution of issues raised by the students or one
    of the academic committees.
- **13.10.** All academic staff and students are responsible for:
  - Familiarising themselves with this policy on appointment/at induction/orientation.
  - Taking a pro-active role in improving the College's research ethics policy and practice.
  - Promoting and implementing/complying with this policy.
  - , if involved in an academic appeal in any capacity:
    - o ensuring they present their case with integrity and in a timely fashion and/or
    - o ensuring they comply with any investigation and the procedures in this policy.
- **13.11.** The **Recruitment and Training Administrators** are responsible for:
  - Ensuring a completed research ethics form is submitted with all assignments which involve research.
  - Ensuring External Examiners are provided with completed research ethics forms when submitting to them assignments which require them.
  - Processing any complaint or appeal related to research ethics in accordance with the relevant policy.

#### 14. POLICY COMMUNICATION

- **14.1.** This document, and all other policy and procedure documents mentioned in this policy, can be found in the student area on the College VLE and on the College website <a href="here">here</a>.
- **14.2.** The College General Administrator will make every effort to respond to any request to provide this policy in a different format. Such requests should be sent to info@allnations.ac.uk
- **14.3.** This policy will be included in staff and student induction.

#### 15. RELATED DOCUMENTS

The following College documents are related to this policy:

- All Nations Christian College <u>Academic Misconduct Policy</u>
- All Nations Christian College Complaints Policy
- All Nations Christian College Academic Appeals Policy
- All Nations Christian College Acceptable use of ICT Policy
- All Nations Christian College Safeguarding Policy
- All Nations Christian College Freedom of Expression and Academic Freedom Policy
- All Nations Christian College Equality and Diversity Policy
- All Nations Christian College Data Protection Policy

16. APPENDICES: Research Forms

#### **Appendix**

#### **RESEARCH FORMS**

When undertaking any research project ALL students must complete:

- the correct proposal form(s) for their level,
- the Ethics Approval Form
- Participant Information Sheet and Informed Consent Form (if using human participants)
- The Supervision Record should be submitted with their final paper.

In the relevant Undergraduate and/or Postgraduate handbooks you will find:

- 1. Level 4 (Integral Mission ) Proposal Submission Form
- 2. Level 5 and 6 Proposal Submission Form
- 3. Postgraduate Preliminary Proposal Form
- 4. Postgraduate Draft/Final Dissertation Proposal Form
- 5. Application for Change of Research Title/Topic (All Levels)
- 6. Ethics Approval Form (All Levels)
- 7. Participant Information Sheet/Privacy Notice (All Levels)
- 8. Informed Consent Form (All Levels)
- 9. Supervision Record (All Levels)