Research Ethics Policy

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Contents

Executive Summary

All academic, professional, and practical degree programs at Liverpool Hope University are based on research-informed teaching and training. As a collegium, Hope's researchers at undergraduate, postgraduate, doctoral, and postdoctoral levels and research consultancy are mindful of the ethical implications for themselves, their research partners, and societies. All are required to follow the ethical benchmarks of this policy. It explains to them the ethical principles, frameworks, procedures, and documentation that are meant to respect all participants, to do good, and to avoid harm. It requires all parties to maintain professional values such as honesty, truth-telling, accountability, confidentiality, and informed consent; it also provides protection at all levels. It defines the duties of the School Research Ethics Leads, Subject-Research Ethics Leads, and the supervisors. It states how the different ethics committees are constituted and conducted and gives the researchers and their supervisors the necessary checklists to ascertain the adequacy of requirements, procedures, responsibilities, and redressal processes. Its first section gives the principles upon which this policy is based. Its second section describes the frameworks and governance of research ethics. The third section sets out the approval procedures. The fourth and final section provides the necessary guidelines for approving a research project.

Preamble

Liverpool Hope University supports research by staff and students. In accordance with their academic disciplines and competencies, staff and students exercise their responsible freedom in choosing their research areas, questions and methodologies. At all levels and in all processes of research they are obliged to maintain research integrity; for this purpose, this research ethics policy provides fundamental principles and frames of reference.

Introduction

The responsibility for promoting and delivering good research practice is shared by the whole research community. Researchers should strive for the highest achievable standards in the planning, conduct and reporting of their research and demonstrate integrity in their dealings with others. Organisations funding, undertaking or engaged with research should foster a culture that supports and embeds good research practice and aims to prevent research misconduct. Researchers and research organisations have a duty to ensure that roles and responsibilities are clear, that appropriate resources and skills are in place and that a robust framework is in place to ensure the highest standards of integrity, including the standards required in relation to research ethics.

Whilst systems of ethics review and regulatory requirements change quite rapidly, there are a number of *ethical principles* that should be followed when undertaking research and they form the basis of this policy. At their core, these ethical principles stress the need to (a) *do good* (known as *beneficence*) and (b)

do no harm (known as *non-malfeasance*). In *practice*, these ethical principles mean that all researchers, whether staff or students, need to ensure that their research is designed and conducted to the highest standards possible. In order to achieve this, researchers may, dependent upon the nature of their project, be required to: (1) obtain *informed consent* from potential research participants or those responsible for their well-being (e.g. parents); (2) minimise the *risk of harm* to participants; (3) protect their *anonymity* and *confidentiality*; (4) avoid using *deceptive or covert practices unless explicitly approved under this policy*; and (5) give participants the *right to withdraw* from the research.

Scope

The Research Ethics Policy encompasses **all research** at **all levels** within the University. This includes:

Undergraduate research (including final year projects and dissertations) Postgraduate research projects (taught Master's, Master's by research, MPhil, EdD and PhD) Staff Research, Research Consultancy, etc.

Clearly the level of ethical oversight required for some projects will be far greater than that required for others, but for the avoidance of doubt this policy applies to all research at all levels. Paragraph 6.3 in Section One provides more details of the level of approval required for particular scenarios.

The policy is divided into four sections:

Section One outlines the principles upon which this policy is based.

Section Two outlines the framework within which the policy is operated, including governance arrangements.

Section Three sets out the approval procedures to be followed

Section Four provides the necessary documentation required of those seeking approval for research projects.

Section One: Principles

1 Basic principles

1.1 The primary responsibility for the conduct of ethical research lies with the researcher. It is a fundamental principle that all Liverpool Hope staff and students engaged in research adopt a continuing personal commitment to act ethically, to encourage ethical behaviour in those with whom they collaborate, to be aware of subject-specific ethical guidelines and to consult where appropriate concerning ethical issues. The University is fully committed to ensuring that all staff and students are fully apprised of their responsibilities in this regard.

1.2 Research undertaken by staff and students must conform to all UK legal requirements. This will include compliance with relevant data protection legislation (e.g. the UK GDPR https://uk-gdpr.org/, and where applicable, also to the EU GDPR https://gdpr-info.eu/) and, if required, appropriate vetting of researchers working with vulnerable groups (e.g. *Disclosure and Barring Service*), and strict adherence to licensing requirements for any animal or biomedical research.

1.3 Researchers must note that Section 59 of the *Safeguarding Vulnerable Groups Act 2006* (https://www.legislation.gov.uk/ukpga/2006/47/contents) identifies vulnerable adults as those persons aged over 18 who by reason of mental or other disability, age or illness are (or may be) unable to take care of themselves or are (or may be) unable to protect themselves against significant harm or exploitation. Assessing vulnerability requires careful reflection, and researchers must also note that the university has adopted the definition of vulnerability as proposed by the Economic and Social Research Council: "Vulnerability may be defined in different ways and may arise as a result of being in an abusive relationship, vulnerability due to age, potential marginalisation, disability, and due to disadvantageous power relationships within personal and professional roles. Participants may not be conventionally 'vulnerable', but may be in a dependent relationship that means they can feel coerced or pressured into taking part, so extra care is needed to ensure their participation is truly voluntary. Researchers will need to assess potential vulnerability within the context of the research, in terms of potential consequences from their participation (immediate and long-term) or lack of positive impact where this is immediately needed or expected."[1]

1.4 Supervisors of student research are responsible for ensuring that all students (be they undergraduate or postgraduate) are fully aware of their responsibilities under 1. 1 and 1. 2 above and should assist the student to meet this requirement and to seek ethical approval for research projects. Research supervisors should do everything possible to ensure that appropriate ethical scrutiny of their students' research occurs and are required to advise on the processes required. Researchers are required to demonstrate that they have secured the appropriate approval for

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[1] "Research with potentially vulnerable people", *UK Research and Innovation*, available online at https://www.ukri.org/councils/esrc/guidance-for-applicants/research-ethics-guidance/research-with-potentially-vulnerable-people/.

their research.

1.5 Supervisors of student research, be it at undergraduate or postgraduate level, and staff research group leaders, are required to be fully conversant with this policy and to maintain an up-to-date familiarity with ethical guidelines and principles operative within their discipline; they are to ensure that students and co-researchers are fully conversant and compliant with the appropriate ethical code/s.

1.6 The University acknowledges the importance of the professional codes of conduct of external organisations and accords them primacy as a default position. However, it is the researcher's sole responsibility to ensure that any necessary external ethical approvals are obtained in advance of applying for University approval, although some research requiring external approval may need prior screening by the University (see Appendix 1).

1.7 The University is a signatory to the *Concordat to Support Research Integrity* (available at https://www.universitiesuk.ac.uk/policy-and-analysis/reports/Documents/2019/the-concordat-to-support-research-integrity.pdf) and as a signatory is committed to:

a) Maintaining the highest standards of rigour and integrity in all aspects of research

b) Ensuring that research is conducted according to appropriate ethical, legal and professional frameworks, obligations and standards

c) Supporting a research environment that is underpinned by a culture of integrity and based on good governance, best practice and support for the development of researchers

d) Using transparent, robust and fair processes to deal with allegations of research misconduct, if they arise.

e) Working together to strengthen the integrity of research and to reviewing progress regularly and openly

1.8 Importantly, the University views the consideration of ethical issues as part of the educative process and not merely a question of compliance.

1.9 It is expected that all researchers will undertake research in accordance with the Concordat (see above) and any breaches may be subject to disciplinary action, as appropriate.

1.10 The researcher needs to consider the harm they can cause to themselves and their interview participants more fully and assess how they would mediate this risk of harm.

2. Informed Consent

2.1 Research involving human participants shall be based, as far as possible and practicable, on the freely given informed consent of those under study. Should deceptive or covert methods be considered absolutely necessary (i.e. where it would otherwise be impossible to obtain the data required) then the principles outlined in section 4 below must be adhered to.

2.2 It is the responsibility of the researcher to explain as fully as is reasonable and appropriate and in terms meaningful to the participants, whether face to face or via internet-mediated research: the aims and nature of the research, who is undertaking it, who is funding it, its likely duration, why it is being undertaken, the possible consequences of the research, and how the results are to be disseminated.

2.3 The researcher needs to follow the university and associated professional association guidance on internet-mediated research and how to ensure participant anonymity and researcher safety. For example, any quotes from posts would need to be paraphrased in any publications so they cannot be traced or used as search terms to locate these websites.

2.4 The power imbalance between researcher and researched shall be considered and great care must be taken to ensure that the latter are not pressurised into participation. Research participants must be made aware of their right to refuse participation at any time.

2.5 Where the research involves a lengthy data-gathering period it must not be assumed that consent given earlier in the study extends over the longer period. It will be necessary to gain consent annually. The exception is desk-based research which does not raise ethical issues requiring greater scrutiny, where approval can be normally granted for a three-year period. In any case, the researcher must also bear in mind that if the nature of their research or that of the data to be collected changes, (e.g., new participants are recruited and / or additional ethical issues are involved), then a new process of gaining ethical approval must be initiated.

2.6 The researcher shall explain clearly how far research participants will be afforded anonymity and confidentiality. If anonymity and/or confidentiality cannot be ensured, this must be made clear to research participants. In requests for ethical approval, a rationale for any departure from complete anonymity and / or confidentiality must be provided. All participants shall be fully aware that even if they agree to participate in the research, they have the option of rejecting the use of data-gathering devices such as tape-recorders and video cameras. The researcher should also explain to participants that they have the option at any stage to stop an interview if they feel any kind of discomfort or distress.

2.7 If there is a likelihood of data being shared with or divulged to other researchers, the potential uses of the data must be made known to the participants and their

agreement to such use should be obtained.

2.8 Researchers should attempt to obtain the verbal, if possible, also written assent of children and **must** obtain the written informed consent of their parent(s) or guardian and in relation to schoolchildren those who are in *Duty of Care* in the place of research (e.g., if the research is to take place in school). It is the researcher's responsibility (or the supervisor in the case of students) to identify in good time if a Disclosure and Barring Service (DBS) check on the researcher is necessary, and to ensure that research does not begin until this has been received. Where research participants are young children or other vulnerable groups, it may be necessary to use a proxy in order to gather data. In this case great care must be taken not to intrude upon the privacy of the vulnerable participants. The researcher must consult relevant professionals and parents/guardians, as appropriate.

3. Deceptive and Covert Research/Research into Illegal Activities

3.1 Researchers shall avoid deception in their research methods, as this violates the principle of informed consent and may invade the privacy of those under study, particularly in non-public spaces.

3.2 The burden of proof will rest on the researcher to show that no alternative methods are possible, and that the data sought are of sufficient value to override the issues of free and informed consent. Where approval has been given, the implications arising from potential publication must be fully considered.

3.3 **Covert research in non-public spaces (that is, where persons would not normally expect to be under observation), or experimental manipulation of research participants without their knowledge, should be a last resort when it is impossible to use other methods to obtain the required data. It is particularly important in such cases to safeguard the anonymity of participants.**

3.4 Any research involving **deceptive or covert methods**, must go to the School Research Ethics Sub-Committee, who will then seek approval from the University Research Ethics Sub-Committee. **There is no delegated authority to approve at School level in such cases**.

3.5 Any proposed empirical research into illegal activities, must go to the School Research Ethics Sub-Committee, who will then seek approval from the University Research Ethics Sub-Committee. There is no delegated authority to approve at School level in such cases. The University expects that empirical research into illegal activities shall not normally be undertaken by undergraduate students.

3.6 The researcher would be obligated to report any illegal activity they encounter to the police.

3.7 Likewise, if the researcher gets into a situation where they are open for prosecution, the police service may need to be informed in advance to mitigate this possibility.

4. Confidentiality and Anonymity

4.1 As far as possible, the anonymity and privacy of research participants must be respected and personal information relating to them must be kept confidential and secure. Any exceptions must be justified by a rationale included in the request for ethical approval and clearly communicated to the research participants. Researchers must comply with the provisions of the *Data Protection Act 1998*, the *General Data Protection Regulation* (2018) and any other Acts or Laws or Regulations, and shall consider whether it is proper or appropriate even to record certain kinds of sensitive information.

4.2 Whilst the researcher shall take every practicable measure to ensure the confidentiality and anonymity of research participants, s/he shall also take care not to give unrealistic assurances or guarantees of confidentiality. Research participants with easily identifiable characteristics or positions within an organisation, for example, must be reminded that it may be difficult to disguise their identity totally without distorting the data.

4.3 The identities and research records of participants must be kept as confidential as possible, whether an explicit pledge of confidentiality has been given.

4.4 All assurances given to research participants of confidentiality and anonymity, whether written or oral, must be accompanied by a declaration that the researcher may need to disclose information relating to certain types of illegal or harmful behaviours.

4.5 **The audio files from the interviews should be destroyed as soon as they have been transcribed and anonymised.**

5. Funded Research

5.1 It is the researcher's responsibility to ascertain whether a funding body is engaged in activity that might compromise the reputation of the University or be in conflict with the University's mission and values. The office of the University's Company Secretary will provide advice if necessary.

5.2 Researchers must ensure that funding bodies are made fully aware that any funding given must be free from the expectation of particular results.

6. All research requires ethical approval

6.1 The scope of this policy (paragraph 3 in the Overview) confirms that it applies to all research undertaken at the University. This can be light touch approval in many cases (as set out below) but in all instances approval in principle is subject to confirmation by the Subject Research Ethics Lead, or School Research Ethics Sub-

Committee, or University Research Ethics Sub-Committee (as set out under Section 3). If a lead researcher cooperates with another staff member (for example, a senior librarian) then their ethics application must be considered by the appropriate School Research Ethics Sub-Committees in the first instance. If research is to be conducted by staff members of the university who lie wholly outside academic school structures, they should consult the Chair of the University Research Ethics Sub-Committee in the first instance, who will guide them as to where to submit their approval request. In practice, this will likely mean delegating to one of chairs of the School Research Ethics Sub-Committees.

6.2 There are certain types of research which will normally require explicit consideration by a full School Research Ethics Sub-Committee and in some cases by the University Research Ethics Sub-Committee.

6.3 The following list of types of research which would normally require detailed consideration at School or University level is not exhaustive and each case must be considered on its own merits:

6.3.1 Research into illegal activities

6.3.2 Deceptive or covert research

6.3.3 Research which directly involves biomedical or clinical intervention, including any use of human material

6.3.4 Research involving animal experiments

6.3.5 Research which might compromise the reputation of the University or be in conflict with the University's mission and values, although it is expected that this will be in very occasional cases given the rightful protection of academic freedom

6.3.6 Research whose source of funding might compromise the reputation of the University or be in conflict with the University's mission and values

6.3.7 Research which involves participation by those under the age of 16[2]

6.3.8 Research which involves participation by vulnerable individuals or groups

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[2] For useful information and best practices consult *The Mental Capacity Act of 2005* (https://www.legislation.gov.uk/ukpga/2005/9/contents), "Research Involving Children", *NHS Health Research Authority* (https://www.hra.nhs.uk/planning-and-improving-research/policies-standards-legislation/research-involving-children/), "Children and young people—Consent to treatment", *National Health Service* (https://www.nhs.uk/conditions/consent-to-treatment/children/), "The Gillick Competence and Fraser Guidelines", *The Royal Society of Medicine* (https://www.themedicportal.com/blog/gillick-competence-and-fraser-guidelines/).

6.4 Research which is related to external bodies will often require ethics approval through the external body's own systems. In these cases, the University will only give its own approval once the requirements of the external body have been met. It is the responsibility of the researcher to ensure that such approval is sought in good time. Specific guidance is given in Appendix 1 for all research which is subject to NHS and Social Care Governance procedures specified by the Department of Health.

6.5 Where an element of the research is conducted outside the UK, appropriate consideration must also be given to any legal and cultural issues prevailing in the location of the research which may have a bearing on the research.

6.6 Preliminary reading and initial approaches to relevant gatekeepers (e.g. head teachers) do not need to wait for ethics approval, although care must be taken with the latter so as not to misrepresent the project or its status.

7. Health and Safety

When preparing their proposal, all researchers must take account of any health or safety considerations affecting either themselves or their research participants. They should also consider all ethical issues which their research would entail. Where health or safety concerns are raised, the first requirement is to undertake a suitable and sufficient risk assessment and to establish appropriate safeguards/ measures. Where applicable, researchers must take account of the University's Lone Working Code of Practice
(https://www.hope.ac.uk/media/gateway/staffgateway/governance/healthandsafetydocuments/Lone%20Working%20Code%20of%20Practice.pdf).

8. Equality and Diversity

8.1 All research undertaken at the University must be in line with the *Equality Act* 2010 (https://www.legislation.gov.uk/ukpga/2010/15/2020-03-19) and with the *University Policy on Equality and Diversity* (https://www.hope.ac.uk/media/gateway/staffgateway/personneldocuments/Equality%20and%20Diversity%20Policy%20v07July20.pdf).

8.2 Equality and diversity matters in relation to research may impinge on ethical approval; therefore they should be taken into account when designing the research methodology, and they should be made explicit in the application.

Section Two: Framework

9.1 Governance of Research Ethics

9.1.1 All research conducted by staff and/or students of Liverpool Hope University is subject to this research ethics policy. However, there will be different levels of approval depending on the nature of the research.

It is the researcher's responsibility to make the initial judgement as to the level of ethical approval that is required (assisted in the case of students by the supervisor). Researchers and their supervisors should take account of the guiding principles in paragraph 6.3.

9.1.2 Please note that it is custom and practice at Liverpool Hope University that responsibility for the implementation of University policy approved by University Council and Senate is devolved to School level. Consequently, it is expected that all Schools will adopt the principles of this Research Ethics Policy. If local practice requires variations in the operation of the policy, then these are allowed subject to appropriate consultation within the School Research Ethics Sub-Committee and explicit approval by the University Research Ethics Sub-Committee.

9.2 Responsibilities of the School Research Ethics Sub-Committee Chairs, Subject Research Ethics Leads, and Supervisors

9.2.1 The School Research Ethics Sub-Committee Chairs

a) Report to the University Research Ethics Sub-Committee;

b) Convene meetings of the School Research Ethics Sub-Committee, at least twice a term;

c) Oversee the training of School / Subject Research Ethics Leads, and maintain a record of needs identified and training delivered.

d) Advise School / Subject staff, especially the supervisors, on research ethics matters.

NB: The primary source of advice for students on matters relating to research ethics should be the student's research supervisor/s or senior member/s of the teaching team.

NB: Where a supervisor / member of staff requires advice on ethical matters, the Subject Research Ethics Lead should be the first point of contact.

e) Ensure that a robust system is in place to record all research ethics approvals given within the School/ Subject Area mapped to student cohorts;

f) Ensure that reports are received on all research ethics approvals granted at School level at the next meeting of the School Research Ethics Committee;

g) Ensure that all cases requiring School or University level approval are considered at the School Research Ethics Sub-Committee in the first instance;

h) Keep the School informed of any developments relating to research ethics and this research ethics policy.

9.2.2 The Subject Research Ethics Leads

i) Sit on the School Research Ethics Sub-Committee and / or any subgroups that may be necessary;

j) Function as the bridge between the Subject and the School Research Ethics Sub-Committee;

k) Attend research ethics training sessions provided by the School;

l) Serve as the first point of call for research ethics for their subject and maintain a good understanding of ethical issues within the subject;

m) Appraise supervisors in matters regarding the policies, principles and best practices of research ethics at Hope;

n) Encourage supervisors to keep agreed due dates;

o) Approve, if necessary, appropriate text-based student research projects. For further details see the section 10.3.

p) Approve, if necessary, student research with human participants, who are not children or vulnerable adults

q) Forward those applications for research with vulnerable human participants, or which raise other significant issues requiring greater ethical scrutiny (see section 6.3), to the School Research Ethics Sub-Committee for consideration and communicate their decisions to the respective supervisors or staff members.

9.2.3 The Supervisors

a) Serve as the first point of call for all applications for ethical approval by students

> **NB**: Students can consult the senior members of the teaching team on matters relating to their specific research, its methodological implications and ethical requirements. However, they should be aware that their supervisors have the delegated authority to decide on ethical matters.

b) Attend research ethics training sessions provided by the Subject or the School.

c) Acquaint their research students with the requirements to meet the necessary standards set out in this policy, the professional guidelines of their chosen disciplines, and the requirements of appropriate Laws, Acts and Regulations of the UK, and if relevant, of other countries.

d) Help their students to formulate their research questions, shape their research design, and consider appropriate research methodologies and tools which fit the topic of their study considering ethical and professional requirements and guidance.

e) Approve those text-based research projects that fully recognise and address the ethical implications of their proposed study (as mentioned in point 10 under 'Research not involving human participants').

f) Forward those applications that involve human participants or other issues requiring greater ethical scrutiny to the appropriate Subject Research Ethics Leads.

Before making this recommendation, the supervisors must be fully satisfied that the students' application has taken all ethical implications into account. They must also complete a statement to this effect.

To make it more practical, the supervisors remind their students to complete their application with sufficient detail so that the Subject Research Ethics Lead can make a judgment on the ethical issues inherent in the application.

It is not the duty of the supervisor to complete the student applications. If a student is unable to put this into practice within a reasonable period of time, the supervisor will advise that the student reverts to a research project that involves no human participants.

9.3 Terms of Reference for the School Research Ethics Sub-Committee

9.3.1 Each Subject Area should appoint one or more Research Ethics Lead/s who will serve on the multidisciplinary School Research Ethics Sub-Committee. In certain circumstances, a Sub-Committee may cover more than one School. The members of this committee ensure that the ethical approval of research within their School is managed effectively and in line with this policy. They also maintain full online records of all approvals granted via the scheme of delegation for audit purposes.

9.3.2 The Chair of the School Research Ethics Sub-Committee must not normally be a Subject Research Ethics Lead to avoid potential conflicts of interest.

9.3.3 All members of this sub-committee **must** be confirmed as appropriate by the Head of School (or equivalent) **and** the Chair of the School Research Ethics Sub-Committee.

9.3.4 All members of this sub-committee will take part in regular training activities and keep themselves up-to-date with the latest developments of ethical matters in their field(s) of expertise.

9.3.5 These members are **not** the primary source of advice to students, rather their role is to ensure that the supervisors and their supervisees adequately address all ethical matters of their research project. Therefore, the members of this sub-committee advise the supervisors on complex projects and to approve individual research projects (within the scheme of delegated authority).

9.4 Constitution of the School Research Ethics Sub-Committee

9.4.1 Each School must have a School Research Ethics Sub-Committee which reports to the University Research Ethics Sub-Committee**.** The minutes of the School Research Ethics Sub-Committee should also be submitted to the University Research Ethics Sub-Committee.

9.4.2 The School Research Ethics Sub-Committee shall be constituted as follows:

a) Chair of this Sub-Committee

b) All Subject Research Ethics Leads in that School

c) Co-opted members as appropriate, as agreed by a full meeting of the School Research Ethics Sub-Committee. It is suggested that the School considers co-opting students as members.

9.4.3 Exceptionally, the Chair of the School Research Ethics Sub-Committee may request that additional expertise and advice be sought from another School to ensure appropriate scrutiny of a proposal.

9.4.4 The School should provide secretarial support for the Sub-Committee.

9.5 Terms of Reference for the School Research Ethics Sub-Committee

9.5.1 To oversee the operation of the research ethics policy within the School

9.5.2 To ensure that any proposed, local variations to the University policy are submitted to the University Research Ethics Sub-Committee for approval

9.5.3 To receive lists at each meeting of any research ethics approval granted at the Subject level and to ensure records are kept of all research ethics approvals

granted or referred back for action. It is expected that School will maintain **online** up-to-date records against cohort data of all ethical approvals.[3]

9.5.4 To consider cases submitted by the Subject Research Ethics Leads for consideration

9.5.5 To keep records of all research ethics training undertaken within the School and to keep training needs and delivery under review.

9.5.6 To report to each meeting of the University Research Ethics Sub- Committee all research ethics approvals within the School.

9.6 The University Research Ethics Sub-Committee

9.6.1 The University Research Ethics Sub-Committee is responsible for oversight of all matters relating to research ethics across the University and for the implementation and updating of this policy. It reports to the Research Committee of the Senate. The University Research Ethics Sub-Committee will meet at least **once a term** to receive reports from the School Research Ethics Sub-Committees and to consider any specific cases brought forward by the Schools. The University Research Ethics Sub-Committee will also keep this policy under review and ensure that systems are in place to provide training and guidance for staff.

9.6.2 This University Research Ethics Sub-Committee should be constituted as follows:

a) The Chair, who will be of Professorial Rank and hence a member of Senate

b) The Chairs of School Research Ethics Sub-Committees, one of whom shall be the Vice-Chair.

c) A member of staff from another UK HEI who has significant experience of research ethics across the sector. The external member is appointed by the University Company Secretary on a biennial basis (with a maximum of two terms).

d) Other staff by invitation

e) One PGR student representative

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[3] For example, normally all Level H students, apart from Initial Teacher Training Students, undertake either an extended project or a dissertation. Likewise, most MA students undertake a dissertation or an extended project. All EdD and PhD students should have research ethics approvals. Therefore each student should receive ethical approval for their project (at some level). It is important that accurate records are kept to ensure all students are managed in line with this policy.

9.6.3 This Sub-Committee will be serviced by the office of the University Company Secretary

9.7   Terms of Reference for the University Research Ethics Sub-Committee

9.7.1 To undertake oversight of all matters relating to research ethics at Liverpool Hope University

9.7.2 To keep under review the Research Ethics Policy

9.7.3 To consider and if appropriate approve any local variations to the Research Ethics Policy requested by Schools

9.7.4 To receive reports of research ethics approvals given at School level

9.7.5 To consider cases referred to it by the School Research Ethics Sub-Committees

9.7.6 To consider appeals against decisions of the School Research Ethics Sub-Committees

9.7.7 To ensure a programme of research ethics training is in place

9.7.8 To keep abreast of developments in research ethics at a national / sector level

9.7.9 To provide an annual report to the Council Standing Committee on Research Ethics

9.8   The Council Standing Committee on Research Ethics

9.8.1 Provides assurance to University Council, via its Audit Committee, that the risks associated with research ethics are being managed effectively.

9.8.2 The Council Standing Committee on Research Ethics shall be constituted as follows:

   a. At least two members of University Council, one of whom shall be the Chair and one the Vice-Chair.

   b. The Chair of Research Committee

   c. The Chair of the University Research Ethics Sub-Committee

   d. The University Company Secretary

9.8.3 The Committee will be serviced by the office of the University Company Secretary.

9.8.4 The Terms of Reference for the Council Standing Committee on Research Ethics are as follows:

a) To provide assurance to Audit Committee and to University Council that the processes in place for the consideration of the ethical implications of research projects are rigorous.

b) To provide assurance to Audit Committee and to University Council that the requirements of research funding bodies for ethical approval are complied with.

c) To provide assurance to Audit Committee and to University Council that legislative and regulatory compliance in matters of research ethics is achieved.

d) To provide an annual report to Audit Committee and to University Council on compliance in matters of research ethics.

NB: The Council Standing Committee on Research Ethics will **NOT** concern itself with ethical approval of individual research projects, which is the remit of the Research Ethics Sub-Committee of Senate.

NB: The Council Standing Committee on Research Ethics shall normally meet at least once per year and shall report to University Council via Audit Committee.

Section Three: Approval Procedures

10. Ethical Approvals of Research Projects

The level of ethical approval required for a research project is determined by whether or not it engages with human participants, whether those participants are considered vulnerable, and whether the project raises other significant ethical issues. Some proposed projects **must** be considered by the University Research Ethics Sub-Committee (as described above), whilst approval of lower risk projects is devolved to the School Research Ethics Sub-Committee/ Subject Research Ethics Leads or Research Supervisor.

10.1   Steps to be followed

Normally, any research being undertaken, follows these steps:

Step 1	The student initiates an online ethics application found in the My Research tab on My Hope.
Step 2	When ready, the students submits their application to their supervisor or lead supervisor.
Step 3	The supervisor scrutinises the application and identifies next steps: a. Approved b. Requires revision c. Submits to Subject Research Ethics Lead
Step 4	The Subject Research Ethics Lead scrutinises the application and identifies next steps: a) Approved b) Requires revision c) Submits to the School Research Ethics Sub-Committee.
Step 5	The School Research Ethics Sub-Committee scrutinises the application and identifies next steps: a) Approved b) Requires revision c) Subjects to the University Research Ethics Sub-Committee

10.2   The framework for approval / delegated approval is provided below:

In addition to these points (10.2 – 10.6), the Supervisors **and** the School and Subject Research Ethics Leads **MUST** use the checklist on the online system, and given below under Section Four, and demonstrate that each research project addresses all key ethical issues.

10.3   Research NOT involving human participants

10.3.1 If the researcher is a student, their supervisor will verify the Checklist, prepare a declaration and then can approve the research project.

10.3.2 If the researcher is a member of staff, the Subject Research Ethics Lead will verify the Checklist, prepare a declaration and then can approve research project.

10.3.3 It should not be assumed that all text-based research can be dealt with by a light-touch scrutiny. Researching certain static-texts such as classified documents and unpublished minutes require greater ethical scrutiny. Therefore, any text-based research project, which involves issues requiring greater ethical scrutiny should be referred to the Subject Research Ethics Lead in the first instance (see section 6.3 for further information. Examples include any risk to the University's reputation, any illegal activity, any deceptive and covert methods, issues of national security, use of unpublished personal archives or data).

10.3.4 Likewise, coding of software development, and the like require in-depth scrutiny. The proposed research project should carefully consider the ethical standards about ownership and security of information, computational bias, algorithmic error and responsibility, technological exclusion, and the like. Coding computer programmes might have adverse effects on the code-writer and its users. Therefore, coding of computer programmes will not be treated as mere text-based research[4] and it will not get any blanket approval.

10.3.5 Researchers, both staff and students, whose text-based research projects do not raise any ethical issues can apply for approval for a period from one to three years, namely,

>   1 year for H-Level dissertation writers
>   2 years for Master students
>   3 years for staff and PGR Students

10.3.6 These researchers do not have to apply for research ethics clearance for each single text-based project such as writing an essay either for publication or a

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[4] The Association of Computer Machinery, for example, has published their *Code of Ethics and Professional Conduct* (https://www.acm.org/code-of-ethics), which stresses the importance of making trustworthy and harmless contributions to enhance the well-being of society in general and human beings in particular. Likewise, for additional information, one can consult *The IEEE Ethics in Action in Autonomous and Intelligent Systems* (https://ethicsinaction.ieee.org/), Software Engineering Code (https://ethics.acm.org/code-of-ethics/software-engineering-code/) and the like.

delivery in a conference. However, should the researchers change their research approach and, for example, start engaging with human participants or dealing with issues that require higher ethical scrutiny, they should submit a fresh application and seek additional ethical approval.

10.4 Research involving human participants

10.4.1 Without any fear or risk of coercion, young people 16 years and over can freely and voluntarily consent for themselves. Unless these young people come under mental capacity legislation, researchers do not require the consent of their legal guardian.

10.4.2 For young people under the age of 16 years, informed consent of the participant and their legal guardian should be sought unless extenuating circumstances exist.

10.4.3 Therefore, if the research involves **only** participants who are above the age of 16 or non-vulnerable adults, the Subject Research Ethics Lead can consider granting approval provided that a) the researcher has satisfactorily addressed all ethical matters within their research proposal, b) the proposal includes the Declaration by the Supervisor and c) the Check List is completed.

NB: A Subject Research Ethics Lead may **not** approve their own student's research if it falls within this category. They can seek approval from another Subject Research Ethics Lead.

10.4.4 If the research involves **children and young people under the age of 16 and / or vulnerable adults**, the School Research Ethics Sub-Committee will consider granting approval.

10.4.5 Research involving health / social care patients, users, staff, organisations (covered by Health Research Authority/NHS Research Governance requirements)

10.4.6 **Involving Patients / Service Users**: meet the standards prescribed by Health Research Authority (HRA, https://www.hra.nhs.uk/) **and** site-specific local research governance requirements; obtain their approval and report the approval to the respective School.

10.4.7 **Involving NHS/Social Care Staff**: Use the guidelines of the Health Research Authority (https://www.hra.nhs.uk/) to review and screen the applications. As applicable, meet the specific requirements of the HRA **and** / **or** local research governance bodies. All approvals should be reported to the respective School.

10.5 Research involving animals

Research involving animals where the proposed research does not require license under the *Animals (Scientific Procedures) Act* (1986, https://www.legislation.gov.uk/ukpga/1986/14/contents), the School Research

Ethics Sub-Committee will scrutinise the project and refer it to the University Research Ethics Sub-Committee for consideration.

10.6 Research involving deception, covert activity, empirical research into illegal activities, or where the proposed research is deemed to pose a significant risk to the University's reputation

The School Research Ethics Sub-Committee will scrutinise the project and refer it to the University Research Ethics Sub-Committee for consideration.

11. Chair's Action

11.1   Normally, the Subject Research Ethics Leads or School Research Ethics Sub-Committees scrutinise applications and grant ethical clearance. Exceptionally, when an urgent situation arises, the Chair of the Sub-Committee can give ethical clearance.

11.2   Where Chair's Action is required (either at School or University Research Ethics Sub-Committee level), it should be progressed by a meeting (possibly virtual) of the Chair and at least two other members of the Sub-Committee.

11.3   At University Research Ethics Sub-Committee level, either the University Company Secretary or the External Member must be one of the other two members involved.

12. Delegated Authority

12.1 In recognition of the large number of ethical approval requests which may arise, the varying level of risk that each presents and the likelihood that many of these will be presented within a narrow time-window, a limited and carefully monitored degree of authority to approve may *in certain circumstances* be vested in designated staff within the School.

12.2 The screening process involved in this hierarchy of delegation of authority is set out under Section 9.3 and Section 10.1 to 10.7. All reference to the activities of such designated staff should be taken as operating within this framework.

13. Timely communication to the researcher

It is the responsibility of the School Research Ethics Sub-Committee to ensure that there is an effective and timely mechanism in place to communicate the decisions of the School Research Ethics Sub-Committee, University Research Ethics Sub-Committee, and of any Chair's Action, to the researcher.

14. Appeal

The decision of the University Research Ethics Sub-Committee is final in all cases, with any appeal against Chair's Action being heard by the full Sub-Committee. Only if a researcher believes there has been maladministration or malpractice can they appeal to the Chair of Research Committee to overturn the decision of the University Research

Ethics Sub-Committee. In such cases, the Chair of Research Committee will review the documentation with two other members of Research Committee. The right to interview the researcher and the Chair of the Research Ethics Sub-Committee is reserved, if necessary.

15. Joint Research

15.1 Where joint or interdisciplinary research is being conducted by members of staff or students in more than one School, the research need undergo ethics review in only one of them.

15.2 For staff research, this would be the School where the lead researcher is based.

15.3 For students undertaking a joint dissertation project, either School can approve the ethical approval.

15.4 In all cases of joint research, participating Schools must be informed of approvals given or re-submissions requested.

16. Joint Research with another institution

16.1 Where research is being conducted jointly with another institution, research ethical approval need not necessarily be sought from both the partner institution and from Liverpool Hope. The decision regarding which institution is the most appropriate from which to seek ethical approval should take into account the location of the principal investigator and/or research.

16.2 Ethical approval from another institution does not, however, exempt Liverpool Hope members of staff from compliance with the University's own research ethics principles as set out in this policy.

16.3 It is the researcher's responsibility to make known any such approval granted by another institution to the relevant Chair of the School Research Ethics Sub-Committee who should check the compatibility of the institution's ethics policy with that of Liverpool Hope and report that approval has been given by an appropriate body to the University Research Ethics Sub-Committee.

17. Research Outside Schools

If research is being undertaken by staff outside their Schools, then advice should be sought from the Chair of the University Research Ethics Sub-Committee.

18. Breach of this Policy

18.1. ANY BREACH OF THIS POLICY MIGHT BE DEEMED ACADEMIC MISCONDUCT AND THE STAFF OR STUDENT CONCERNED MIGHT BE SUBJECT TO THE RELEVANT DISCIPLINARY PROCEDURES.

18.2. IN PARTICULAR, WHERE THE RESEARCH INVOLVES HUMAN PARTICIPATION, NO APPROACHES TO POTENTIAL PARTICIPANTS MAY BE MADE UNTIL ETHICAL APPROVAL HAS BEEN GRANTED.

Section Four: Research Ethics Documentation

19.1 Research Ethics Documentation includes the following:

19.1.1 Application for Research Ethics Approval

19.1.2 Research Information Sheet

19.1.3 Consent Form

19.1.4 Checklist to ensure through scrutiny

19.1.5 Declaration by the Supervisor / Subject Area / School Research Ethics Leads, as appropriate

19.2   Check list for Ethical Approval Request for text-based research

19.2.1 Start date after the date of scrutiny and approval

19.2.2 End date of the approved research project

19.2.3 This proposal agrees with the details in sections 10.3.3 and 10.3.4.

19.2.4 The researcher has identified and will comply with all legal, professional and ethical requirements and other applicable guidelines, if relevant, of other institutions and / or countries.

19.2.5 This text-based research does NOT involve human participants.

19.2.6 This researcher has fully addressed the issues of risk either to themselves or other persons or other things. Thus, they will comply with all legal requirements and best practices relating to health and safety of all stakeholders.

19.2.7 If the research project is undertaken by a member of staff, has this project adequately considered issues pertaining to management responsibilities, contractual agreements with funding bodies and / or publishers, intellectual property rights, any potential conflicts of interests?

19.2.8 The researcher is aware of the consequences of any ethical misconduct.

19.2.9 The research DOES NOT risk the University's reputation.

19.2.10   This text-based research does NOT engage with any illegal activities.

19.2.11   The text-based research does NOT employ deceptive or covert methods.

19.2.12   The research HAS NO interaction with issues of national security.

   NB: If there is any ethical dilemma or risk, the application for research ethics clearance will not necessarily be refused. However, the Supervisors and / or Subject

Research Ethics Leads should flag it up, complete the check list and forward the application to the School Research Ethics Sub-committee. If this Sub-committee cannot solve the problem, they will forward the application together with their remarks to the University Research Ethics Sub-committee.

19.3 Check list for Ethical Approval Request only for research involving human participants who are NOT children (below 16) or vulnerable adults: verify the accuracy of the following points:

19.3.1 Start date of the actual research is after the date of scrutiny and approval.

19.3.2 End date of the approved research project

19.3.3 The applicant has identified appropriate professional guidelines.

19.3.4 Informed Consent is being sought from ALL relevant parties and Consent Form(s) and Research Information Sheet(s) are included.

19.3.5 Power relations are clearly defined and discussed and addressed.

19.3.6 Risk to the health and safety of their research subjects is adequately discussed and addressed.

19.3.7 Risk to the researcher's health and safety is adequately discussed and addressed.

19.3.8 The right to withdraw is explicit and thought through in the Research Information Sheet and Consent Form.

19.3.9 Anonymity is adequately dealt with in the Research Information Sheet and Consent Form.

19.3.10   Confidentiality is adequately dealt with in the Research Information Sheet and Consent Form.

19.3.11   Security of information Anonymity is adequately dealt with in the Research Information Sheet and Consent Form.

19.3.12   Collection, storage and manage of research data are adequately dealt with in the Research Information Sheet and Consent Form.

19.3.13   If the research project is undertaken by a member of staff, has this project adequately considered issues pertaining to management responsibilities, contractual agreements with funding bodies and / or publishers, intellectual property rights, any potential conflicts of interests?

19.3.14   The researcher is aware of the consequences of any ethical misconduct.

19.3.15   The research DOES NOT represent a risk to the University's reputation.

19.3.16   This research is NOT into illegal activities.

19.3.17   The research does NOT employ deceptive or covert methods, such as to negate or impede the ability of the participants to give informed consent.

19.3.18   The research HAS NO interaction with issues of national security.

NB: If there is any ethical dilemma or risk, the application for research ethics clearance will not necessarily be refused. However, the Supervisors and / or Subject Research Ethics Leads should flag it up, complete the check list and forward the application to the School Research Ethics Sub-committee. If this Sub-committee cannot solve the problem, they will forward the application together with their remarks to the University Research Ethics Sub-committee.

19.4 Check list for Ethical Approval Request for research involving human participants including children or vulnerable adults: verify the accuracy of the following points:

19.4.1 Start date of the actual research is after the date of scrutiny.

19.4.2 End date of the approved research project

19.4.3 The applicant has identified appropriate professional guidelines.

19.4.4 Informed Consent is being sought from ALL relevant parties and Consent Form(s) and Research Information Sheet(s) are included.

19.4.5 Power relations are clearly defined and discussed and addressed.

19.4.6 Risk to the health and safety of the research subjects is adequately discussed and addressed.

19.4.7 Risk to the health and safety of the researcher is adequately discussed and addressed.

19.4.8 The right to withdraw is explicit and thought through in the Research Information Sheet and Consent Form.

19.4.9 Anonymity is adequately dealt with in the Research Information Sheet and Consent Form.

19.4.10   Confidentiality is adequately dealt with in the Research Information Sheet and Consent Form.

19.4.11   Security of information Anonymity is adequately dealt with in the Research Information Sheet and Consent Form.

19.4.12   Collection, storage and manage of research data are adequately dealt with in the Research Information Sheet and Consent Form.

19.4.13   If the research project is undertaken by a member of staff, has this project adequately considered issues pertaining to management responsibilities, contractual agreements with funding bodies and / or publishers, intellectual property rights, any potential conflicts of interests?

19.4.14   The researcher is aware of the consequences of any ethical misconduct.

19.4.15   The research DOES NOT represent a risk to the University's reputation.

19.4.16   This research is NOT into illegal activities.

19.4.17   The research does NOT employ deceptive or covert methods, such as to negate or impede the ability of the participants to give informed consent.

19.4.18   The research HAS NO interaction with issues of national security.

NB: If there is any ethical dilemma or risk, the application for research ethics clearance will not necessarily be refused. However, the Supervisors and / or Subject Research Ethics Leads should flag it up, complete the check list and forward the application to the School Research Ethics Sub-committee. If this Sub-committee cannot solve the problem, they will forward the application together with their remarks to the University Research Ethics Sub-committee.

Appendix 1: Approvals of human health related research

1) Students must access the Health Research Authority portal and use the Integrated Research Application System (IRAS) and the NHS Research Ethics Committee Central Booking Service for obtaining the necessary approvals. For social care research there is a national Social Care Research Ethics Committee which shares the same system. Both systems require a detailed research protocol and an evaluation of the scientific quality of the research proposal to be undertaken before ethical approval is requested.

2) Proposals may need to be submitted for pre-approval ratification to the relevant School Research Ethics Sub-Committee for methodological evaluation and any required changes must be undertaken before it is submitted to the local NHS Committee.

3) Comprehensive advice and guidance is available at https://www.hra.nhs.uk/planning-and-improving-research/research-planning/ and information on IRAS is available at https://www.hra.nhs.uk/about-us/committees-and-services/integrated-research-application-system/

4) Following publication of revised governance arrangements for NHS Research Ethics Committees in 2011, the following types of research no longer automatically require approval by an NHS ethics Committee (REC): Research carried out on NHS premises Research carried out on NHS staff.

5) In both cases, and subject to the guidance within the Health Research Authority portal, ethics approval can be sought via the University Ethics Review Procedure, as long as the research does not involve any other categories for which NHS REC approval would be required. Researchers should be aware that whilst full NHS REC approval may not be required, research in the aforementioned categories may still require research governance approval from the organisation in which it is taking place. **Researchers must contact the research ethics governance office of the organisation in which the research is planned to check local requirements, obtain the necessary permissions and provide evidence of this to the School Research Ethics Sub-Committee and the University Research Ethics Sub-Committee**.

6) For full guidance on the types of research for which NHS REC approval is required, please refer to the Department of Health's policy document, which is available at: https://www.hra.nhs.uk/approvals-amendments/what-approvals-do-i-need/

7) It should be noted that the definition of research applied by the NHS is not as broad as the definition applied by the University. Hence a research project that does not need to be ethically approved via the NHS Ethics Review Procedure will still come under the remit of the University's ethics policy.

8) Additional helpful links:

The Integrated Research Application System (IRAS)

Research Ethics Committees overview

What approvals and decisions do I need?

Research planning

Planning your application for HRA Approval

Applying to a Research Ethics Committee

Coronavirus / COVID-19 - key guidance

Appendix 2: Appeals

1) Researchers, whether student or staff, who are dissatisfied with the outcome of a request for Research Ethics clearance should first seek clarification from the person who notified them of the outcome, in case there has been a misunderstanding or there is an issue which can be readily resolved.

2) After this if they still wish to seek a change to the outcome, they should appeal in writing (an email is acceptable) to the Chair of the University Research Ethics Sub-committee, through the University Research Support Officer (RSO). The appeal should set out concisely why the researcher finds the outcome unsatisfactory, the precise grounds on which the appeal is being made, and the desired outcome of the appeal. Any appropriate supporting evidence should also be presented, along with the information given in response to the request.

3) Those considering an appeal should note that simply disagreeing with the outcome is not of itself sufficient; there must be other aspects associated with the decision (e.g. material circumstances relating directly to the request of which the reviewing body was not aware; that material procedural irregularities occurred in the review process; or that there is demonstrable evidence of prejudice, bias, or inadequate review.)

4) The email or letter setting out the appeal should be copied to the Chair of the School Research Ethics Sub-committee and, where appropriate, to the supervisor of a student research project or the Head of the Subject Area (or equivalent) for staff research. Note that only the researcher is able to make an appeal, although other parties (e.g. the supervisor for a student) may provide appropriate guidance and support.

5) The RSO will acknowledge receipt of the email or letter within one working week of it's being sent, and will advise the appellant when the next meeting of the University Research Ethics Sub-committee is expected to take place. The RSO will ensure that the appeal is placed on the Agenda and that all relevant material is supplied to the meeting, and will communicate the outcome of the appeal within one working week of the meeting. The appeal will be entirely paper-based.

6) If the next meeting is so timed that waiting until it takes place might jeopardise the conduct of the research if the appeal were to be successful, the appellant may request that the Chair of the University Research Ethics Sub-committee take Chair's Action to consider the appeal ahead of the next meeting. The request should be made through the RSO, who will communicate the Chair's decision (which is final) as to whether the request is accepted, and the date by which the Chair's Action will be taken if the Chair accepts the request.

If the appellant is dissatisfied with the outcome of the appeal one final stage is permitted, which is an appeal to the University Research Committee. The process and timing of this final stage will be communicated along with the outcome of the appeal. The decision of the Research Committee is final.