

## **Appendix 1**

# **School of Advanced Study**

# **Ethics Approval Process and Guidance**

This document provides guidance on the parameters and procedures for ensuring that research and other activities carried out by researchers at the School comply with ethics standards. ‘Researchers’ include ‘all [School] staff, research students, and those who are not members of the School, but who are conducting research under its auspices, such as Visiting Fellows’.

This guidance builds on the University of London (UoL) [Research Ethics Policy](#) and sits within the wider research policy framework at UoL including – the University’s [Code of Good Practice in Research](#) and [Research Data Management Process](#). Researchers should carefully read these policies prior to designing or carrying out any research.

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## A- Approval Process and Procedures

### 1. Ethics approval: when is it required?

UoL ethics policy stipulates that **all research projects must be checked for any ethical implications before the research takes place**. This aims to ensure that both individual researchers and the university comply with their ethical duties. This is an absolute requirement and there are no conditions under which research should be designed or implemented under the auspices of the School without full consideration of its potential ethical implications by the researcher.

This duty to consider ethical implications is not limited to research only but extends to **all academic activities** carried out under the auspices of the School. For instance, reflection on potential ethical challenges is particularly required for any public engagement activities by the School that involve the active participation (rather than the mere attendance) of vulnerable people, children etc.

**In certain circumstances, ethics approval for such activities must be sought** from the UoL [Research Ethics Committee](#) (REC). Researchers at the School seek ethics approval by completing an [Ethics Self-Assessment Form](#) (ESAF) (under Procedures section) and submitting it via the SAS Research Office (at [research.ethics@london.ac.uk](mailto:research.ethics@london.ac.uk)). The process is designed both to promote reflection by researchers on ethics and to ensure unethical activities do not take place.

The circumstances in which different categories of researchers at the School are required to seek ethical approval via the ESAF process are set out below. The failure to seek REC approval when it is required, and the carrying out of research without appropriate ethical approval from the university, may expose the researcher to disciplinary and/or other sanctions (see 7 below).

#### 1.1 Staff at the School

School staff must always reflect on the potential ethical implications of research and other academic activities prior to carrying them out. However, the presumed research expertise of SAS research staff, and **compulsory staff ethics training** provided by the School, mean that seeking ethics approval from the REC via the ESAF process is a requirement **only** where the proposed activities involve:

- a. Research on 'human participants' or 'data relating directly to identifiable human subject'; or
- b. Other factors giving rise to ethical concerns, including 'a risk or harm to the researchers or the participants; political or social sensitivity (ref. to the Prevent duty and sensitive data); impact on culture and cultural heritage'.

Where staff members apply for external, private or internal funding for research or other academic activities, **ethics approval via the ESAF process must be obtained as early as possible**, but certainly no later than **the point at which evidence of ethical compliance is requested by the funder** (usually when proposal is submitted to funder) . In some circumstances, provisional ethics approval can be granted via the EASF process subject to full review before the methodology is finalised.

#### 1.2 Students at the School

A similar presumption of ethics competence cannot be made for student researchers, who are in the process of being trained in research. As such, **all research students and all taught students must submit an ESAF and receive ethical approval before engaging in substantive research for dissertation or other projects during their programme of study at the School**. This duty on students to apply for ethics approval exists **regardless** of the specific research theme or methodology.

Approval is not required for essays or other taught module coursework, except where ethical concerns may exist.

### 1.3 Other researchers under the auspices of the School

Researchers who are not staff or students **must seek the approval of the host**, Institute or School (depending on the nature of the affiliation) **for any proposed research** carried out under its auspices. For instance, for Visiting Fellows, this would usually be via the fellowship proposal form. The School staff reviewing such proposals must direct the non-member researcher to seek ethics approval from the REC for any research or other academic activities that would require such approval to be sought were the activities being proposed by a staff member (see 1.1 above).

### 1.4 Individuals seeking to apply to the Doctor of Philosophy by Publication

The award of Doctor of Philosophy by Publication is designed for individuals with an existing portfolio of published work (not more than 10 years old) addressing a central research question. The portfolio shall consist of peer verified outputs which are in the public domain and /or published research which must constitute a substantial and coherent body of work, comparable to the extent of work required of a standard PhD programme and demonstrative of a significant contribution made to the field. Ethical review is expected to be undertaken **as part of the application process** to provide the University assurances that the published work followed ethically-sound methodology and sector/discipline-led best practice. The procedure is as follows:

- Applicants will be asked to provide evidence of ethical approval or implementation of ethically-sound methodology as part of their application process. This should be made clear if the same methodology had been applied across all the published work or different approaches were needed. Evidence can include previous hosting institution's evidence (formal or informal approval), publishers' discussions, example of data management plan used or consent forms...
- In the case that institutional research ethics process may not have been available for some or all of the portfolio publications, or for some other reason ethics permission may not have been obtained, the applicant, using the UoL Research Ethics Policy and self-evaluation form as a guide, should make the School aware before submitting their formal application of any aspect of the research undertaken that might raise any issues
- It is the responsibility of the intended institute or centre that research ethics form a part of the discussion and interview process prior to the admission of any candidate for the PhD by Publication. A portfolio including items for which no ethical assessment has been performed, or which raise some ethical issues are not in and of themselves grounds to deny admission to a potential student, but the candidate, the institute and the School all need to be aware in advance of any questions surrounding research ethics that may arise. In this instance, the Research Ethics Committee should be consulted well in advance, via [research.ethics@london.ac.uk](mailto:research.ethics@london.ac.uk).

**For avoidance of doubt, only applicants who receive satisfactory ethical review can be accepted into the research programme.**

- After starting the programme, the student should submit a formal self-evaluation ethics application, including details, where appropriate, of any mitigations undertaken to the Committee as soon as possible and before the end of the first term of registration at the latest.
- The critical appraisal document submitted by the student for assessment should include a consideration of research ethics and must incorporate any advice or comments supplied by the Research Ethics Committee.

The full procedure can be found here: [link to the PhD by Publication](#)

## 2. Parallel procedures: what must be done before applying for ethical approval?

At the School, the Research Office manages the formal ethics approval process. Researchers apply **for such approval through the completion and submission of an [Ethics Self-Assessment Form](#) (ESAF)** (under Procedures section). However, in some circumstances, researchers may need to engage with one or more parallel UoL or School processes prior to submitting the completed ESAF to the Research Office. Engagement with these processes, which can be lengthy, should be factored into planning where appropriate.

### 2.1 Ethics training

**All researchers applying for ethics approval are required to confirm on the ESAF that they have completed the *online ethics training module* (available via [Studyonline for Students](#)) prior to submission of the form.** Additional training will also be provided for taught or postgraduate degrees at SAS.

*Staff and fellows (from both inside and outside the University of London) can access the course on RESHAPED by logging on to <https://reshaped.sas.ac.uk/> and will need to set up an account. Once this is done, visit the URL: <https://reshaped.sas.ac.uk/course/view.php?id=29> and enter the enrolment key: ResearchEthics\_2023*

### 2.2 Fieldwork in the UK or overseas

The **UoL Travel Policy**<sup>1</sup> defines ‘fieldwork’ as travel in the UK or overseas for the purposes of research, teaching or other activities while representing the university. For any travel, other than that to safe, low risk destinations and for low-risk activities, this policy requires researchers to complete a **UoL Travel Risk Assessment Form (Appendix 2 of the ESAF)**. This form **must** be submitted with the ESAF when appropriate.

### 2.3 Security-sensitive research

If a proposed project may involve ‘security-sensitive’ research (see section 9.1 below for a definition of this term), the researcher should ensure that s/he is familiar with the [Prevent Duty](#). The 2015 Counter Terrorism and Security Act places an obligation on Higher Education Institutions to have ‘due regard to the need to prevent individuals from being drawn into terrorism’. The ESAF contains an Appendix with additional questions for any security-security research.

### 2.4 Use of third party commercial data-gathering services

Any research involving the use of third party commercial data-gathering services (such as Prolific) must also be authorised in advance by **UoL Procurement Services**. This is to ensure compliance with the [2015 Modern Slavery Act](#), which requires that the university combat any risk of modern slavery in its own operations and also in its supply chains.

Researchers should be aware that, where a third party service provider of this kind is not already on the UoL pre-approved suppliers list, the process of verification by UoL Procurement can be lengthy and should be factored into research planning. **Researchers should without delay contact their department/institute manager if they require such services.**

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<sup>1</sup> Travel policy 2022 on the [intranet](#)

The ESAF asks researchers using such services to provide details of the agreement with the external companies and confirm that they have completed this process.

## 2.5 Applications for external funding

Research grants sought for sums over £15,000 (or for lesser sums but considered risky) require a risk assessment, which is aimed to support institutional authorisation. The risk assessment includes confirmation that ethical approval has been sought. Relevant details of the external funding application also need to appear in the ESAF.

## 2.6 Selection of research students

Potential supervisors should pay particular attention to students intending to undertake research in sensitive or controversial areas. Any special provisions, facilities or resources, including access to nominally prohibited sites or to secure storage of materials should be identified by staff. Prior to issuing an offer letter, the School should confirm that special arrangements can be provided throughout the length of the research degree programme.

## 2.7 Informal consultations

Research training is provided to School researchers in a range of formats, many of which offer the possibility of seeking informal advice on ethics matters for projects that are, or may be, developed. Moreover, the Research Office and the REC Chair are available to speak with School researchers about ensuring the ethics compatibility of research or other academic activities that they may be planning. Where appropriate, researchers are thus encouraged to take up this offer at the earliest stages of project design long in advance of the point where formal ethics approval may be required.

## 3. How do I apply for ethics approval?

The formal ethics approval process is managed by the Research Office. Applications for ethics approval are made by completing an [Ethics Self-Assessment Form](#) (ESAF) (under Procedures section), which results in the project being categorised as category 'A', 'B' or 'C' depending of the degree of ethics issues identified (See 4 below). Where the self-assessment result is a 'B' or 'C', the draft versions of any [project participant information sheet and participation consent form](#) (under Procedures section) must be submitted with the ESAF.

The process is responsive and ongoing throughout the year - there are no annual deadlines. The ESAF must be submitted with relevant documentation, and approval obtained, **before any proposed research commences**.

### 3.1 Preparing and submitting an ESAF

Researchers should factor sufficient time into their planning to fully prepare the ESAF submission. From the outset, researchers need to **complete the online training module before starting filling in the ESAF**. In addition, filling in an ESAF can sometimes be a lengthy process, especially if the proposed research raises ethical concerns.

1. The **online training module** can be found on the [studyonline](#) platform. Any access problems should be reported to [Studyonline\\_Support@sas.ac.uk](mailto:Studyonline_Support@sas.ac.uk). The module is composed of a tutorial on all ethical aspects of undertaking research as well as a quiz (set of 12 questions). Researchers **must score 80% or above**. For any lower score, the quiz must be retaken. Completion of the module and the score are recorded and tracked by the Research Office and by Registry. Completion of the module also needs to be noted on the ESAF.

2. Researchers seeking ethical approval must email the completed ESAF and supporting documentation to: [research.ethics@london.ac.uk](mailto:research.ethics@london.ac.uk). Submitting an incomplete ESAF, or one that does not adequately engage with the ethical aspects of the project, is likely to lead to protracted correspondence and substantial delay later in the assessment phase.

Note, though, that special procedures apply in the case of students (see 3.2 below) and in certain other circumstances (see 3.3 below). Retrospective approval is given **only** in exceptional circumstances (see 6 below).

### 3.2 Procedure for students

For taught students, dissertation supervisors must be actively involved in reading the student's work and supporting them in identifying potential ethics issues and mitigating them. Research students should be supported by their supervisors in this respect. All students must send the draft version of their ESAF for **review by their supervisor** and make any changes recommended by him/her. In each case, the supervisor must sign the completed ESAF prior to submission (an electronic signature is sufficient).

After obtaining the signature of their supervisor, **research students should submit the completed ESAF directly to the Research Office**, via the procedure described above.

After obtaining the signature of their dissertation supervisor, **taught students should instead submit the ESAF by email via the 'filter' system** in place for each taught programme at the School.

Each taught programme has a filter comprised of at least two members of staff from the pertinent SAS Institute who act under the ultimate responsibility of the programme director. This mechanism has the power to grant rapid ethical approval for 'A' category results (i.e. no significant ethical issues) - these must then be sent in one batch to the Research Office for the conferral of assessment reference numbers for each ESAF. ESAFs with 'B' or 'C' category results cannot be approved by this filter, which must instead send them directly to the Research Office for review (see 4 below).

### 3.3 Procedure in special cases

If the project falls under the auspices of another professional association or organization (in the case of consultancy) that has its own code of ethics, researchers must get advice from that organisation and comply with its research ethics guidelines. A statement on how the research complies with those guidelines must be included in the ESAF submission and sent to [research.ethics@sas.ac.uk](mailto:research.ethics@sas.ac.uk).

If the project has been approved at another university or elsewhere, all written external approvals must be forwarded to Research Office at [research.ethics@london.ac.uk](mailto:research.ethics@london.ac.uk). If no written approval is available, the researcher will be asked to fill in an ESAF and submit it to [research.ethics@london.ac.uk](mailto:research.ethics@london.ac.uk).

For experiments being undertaken under a project which has already received approval, researchers must ensure they explain clearly in their ESAF how those experiments relate to approval granted to the project as a whole. However, should the methodology of the experiments vary substantively from those for which approval has been given, then a separate ESAF will be required. If in doubt, please contact Research Office at [research.ethics@london.ac.uk](mailto:research.ethics@london.ac.uk) prior to submitting an ESAF.

## 4. Ethics applications: how are they processed?

The processing of ethics approval applications via the ESAF process is managed by the SAS Research Office, working closely with the REC.

#### 4.1 Process and timescales

Upon receipt of an ESAF submission by email, whether directly or (for taught students) via the filter system, the Research Office will send an emailed **acknowledgement of receipt within five (5) working days**. This email may also request that the researcher correct any errors on the ESAF and/or provide any missing information or documentation to support the submission. This can include reclassifying the category of the ESAF result (see below) where this appears incorrect.

The procedure following submission to the Research Office depends on which of the three possible results is produced by the self-assessment exercise undertaken by the researcher in the ESAF (see ESAF for further details):

<b><i>ESAF result</i></b>	<b><i>Ethical issues</i></b>	<b><i>Approval by</i></b>
'A' category	No significant ethical issues are raised by research	Research Office <sup>2</sup>
'B' category	Adequate safeguards can and will be put in place	Research Office or REC <sup>3</sup>
'C' category	Substantial ethics issues require a full review	REC

Where the self-assessment result is a 'B' or 'C', the draft version of any [participation consent form and participant information sheet \(under Procedures section\)](#) **must be submitted with the ESAF**.

The timescale for determining ethics approval, **once all of the necessary documentation has been provided in good order, will usually be no longer than four weeks**. However, as part of this process of reviewing an ESAF, the Research Office and the REC may request further details, pose questions to the researcher or take any other necessary steps to determine the application. For complex projects, the timescale may thus be significantly longer and researchers should plan accordingly.

For 'B' or 'C' category submissions reaching the REC, two REC members will usually carry out the review. The two reviewers will be selected, wherever possible, on the basis of their experience or expertise in relation to the ethical issues raised by the particular ESAF submission. For an ESAF disclosing fieldwork or other safety risks, the REC observer from UoL Health and Safety Services will usually be invited to offer a view on that aspect of the application. In the case of any disagreement between REC reviewers, the decision of the REC Chair is determinative.

#### 4.2 Scope of the review

Ethics application reviewers are entitled to offer feedback and guidance on wider issues of research design. However, unless the design raises ethical concerns, ethical approval must be granted or withheld on the basis of ethical compliance only. Researchers are required to respond only to reviewer queries or feedback relating to ethics issues (including considerations of safety) but not to wider points about methodology that are not directly relevant to ethics approval.

Research on sensitive topics or fieldwork in insecure locations is not *per se* a ground for withholding ethical approval. However, the ethics risks inherent in such research mean that researchers will need to take special care in addressing the ethical implications of such research in the ESAF submission. If

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<sup>2</sup> For taught students, the Research Office merely confirms the 'A' category assessment carried out by the specific programme filter and monitors the overall functioning of the filter system.

<sup>3</sup> The decision whether to review a 'B' category application or refer it to the REC rests with the Research Office but, where any doubts exist, the application should usually be referred to the REC.



fieldwork or other research entails specific safety risks (including travel against the advice of the UK Foreign and Commonwealth Office), then it is the responsibility of the researcher to note such risks in the ESAF and explain in detail how they will be addressed and mitigated.

Students particularly will need to think carefully before selecting a dissertation topic that involves research on sensitive topics or fieldwork in insecure locations since both the topic and the methodology will need comprehensive and detailed justification in the ESAF. Depending on the specific risks involved, ethical approval may be withheld.

## **5. Granting and withholding ethics approval: what does it mean?**

If ethics approval is granted following review of the ESAF, the Research Office will provide an **approval reference number** along with the confirmation of the results. This unique reference number can be quoted in external correspondence if required. It must appear on any participation consent form and participant information sheet to be used by the researcher for that project.

The granting of ethics approval for a project does not release the researcher from their ongoing duty to ensure that project activities and their own conduct comply with university ethics standards.

### **5.1 Extending projects post-approval**

Ethics approval is valid only for the research or activities described in the ESAF to which it pertains. It is not valid for any other research or activities, including changes to those described in the ESAF.

Approval in writing is required afresh from the REC Chair, and must be sought immediately by the researcher via a written statement emailed to the Research Office, if either:

- An amendment to an approved project may raise new ethical issues, for example changes to the method of participant recruitment, or changes in the method of data collection; or
- The proposed project constitutes an extension to an existing project, or is a new project but re-using existing data.

Such approval must be secured prior to the implementation of any such changes to the terms of the project, unless the circumstances make such prior approval impossible, in which case it must be secured as soon as is practicable in the prevailing circumstances. In the meantime, any research not covered by the existing approval must be halted.

For both taught students and research students, if examiners have serious concerns that research has gone beyond the bounds of REC approval given, they should refer the matter immediately to the appropriate point of contact (i.e. programme director for taught students, primary supervisor for research students). In most cases, it will be appropriate to refer the research to the REC for consideration.

### **5.2 Ethics approval for students: records and progress through studies**

A central record of which students have received ethical approval, and when, must be maintained by Registry. Registry will always be copied into ethics approval confirmation from the Research Office.

Research students are subject to a formal administrative requirement to submit the REC ethics **approval number as part of the upgrade process**. This should take place before the upgrade viva, with evidence of ethical approval a formal requirement for upgrading. **Registry will not confirm the upgrade of any student without evidence of ethical approval.**



Research students are also subject to a formal administrative requirement to submit the REC ethics approval number at the point of submission of the final thesis. **Registry will not confirm submission of the PhD thesis without clear evidence of ethical approval.**

Taught students are subject to a formal administrative requirement to submit the REC ethics approval number when submitting their dissertation. **Dissertations should not be accepted by taught programmes without clear evidence of ethical approval.**

## **6. Retrospective approval: what if I didn't apply for ethical approval when required?**

Research and other academic activities that require ethics approval **must not be carried out until such approval is received**. Carrying out research without ethical approval in circumstances where such approval is required may attract disciplinary and other sanctions (see below).

The primary duty on any researcher who realises that they have undertaken a project without first obtaining ethical approval when this is required must, as soon as the oversight is identified, immediately contact the Research Office to request retrospective approval for the project.

**Retrospective approval will be granted in exceptional circumstances only.** There is no guarantee that retrospective approval will be given and, depending on the outcome, any data collected may have to be destroyed and disciplinary or other sanctions may be imposed (see 7 below).

Applications for retrospective approval must be made by completing an ESAF giving full details of:

- The ethical concerns raised by the ESAF questions and outlined in the online module within the context of the research that has already taken place;
- How the research was carried out in practice;
- Whether any ethical issues arose and how they were addressed; and
- Why approval was not sought prior to carrying out the research or academic activities.

For avoidance of doubt, completion of the online module is compulsory and should be undertaken even if seeking retrospective approval.

The onus lies on the researcher to provide a cogent explanation of why ethical approval was not sought as required and to produce evidence to show how ethical issues were addressed. It is the duty of the researcher to provide full information on each point, along with any supporting documentation, as swiftly as possible. In the absence of such efforts by the researcher, ethics approval will not be granted retrospectively.

Until retrospective ethics approval for that project is granted, the researcher **must desist from any further research activities in relation to that project and must make best efforts to prevent any resulting materials or data from entering the public domain (and remove or suspend any already in the public domain) and to inform research participants and, as relevant, funders of the situation**. It should state that any failure to comply may attract sanctions for breach of ethics policy.

## **7. Audits & Sanctions for unethical research**

The RS may conduct audits at any time. Unethical research will attract sanctions. Failure to comply with the UOL Code of Good Practice in Research may give rise to an allegation of misconduct.<sup>4</sup> Breach of the UoL Research Ethics Policy ‘will be taken extremely seriously’ and may result in disciplinary actions. Serious unethical behaviour may also give rise to criminal prosecution or civil actions by the victims.

If the REC identifies that research already carried out has infringed the Research Ethics Policy, it will refer the matter to the appropriate authorities for a decision about disciplinary or other action and it has the power to make a recommendation on any potential measures to remedy the breach (whether data collected has to be destroyed etc.). This is an inherent faculty of the REC.

## **B- Guidance on Ethical issues that researchers may encounter**

Here are some examples of what might be an ethical issue or risk in your research. This is not an exhaustive list – you may identify other issues in your own research project. You will need to explain how you will deal with each of the issues or risks you identify.

### **1. Who are the researchers?**

The identity or profile of the research can generate ethical concerns as, for example, where a conflict of interest exists for the researcher.

### **2. What is the subject-matter of the research?**

The subject matter of the research can raise ethical concerns, for example, if it is:

- Controversial / contentious / sensitive / embarrassing / upsetting subject-matter?
- Security-sensitive, defined as
  - commissioned by the armed forces
  - commissioned under an EU security call
  - involve the acquisition of security clearances
  - concerns terrorist or extreme groups

Some examples include:

- Research into illegal activities, including the collection of source data (e.g. crime statistics)
- Research which requires access to web sites normally prohibited on university services, including but not limited to pornography, or the site of any organization proscribed by the UK government;
- Research into extremism and radicalisation.

The definition of sensitive research encompasses a wide variety of research topics and it is a requirement to complete the relevant questions in the self-check form in order to ascertain the true sensitivity of particular research if Part 1 Question 3 (under Research Subjects) has been ticked.

### **3. Who are the participants?**

The potential vulnerability of the research participants can raise ethical concerns, particularly if the research involves, for example:

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<sup>4</sup> SAS Code of Good Practice in Research, para 11.

- Children or young people are involved (under 18)
- Vulnerable people are involved (elderly, physically or mentally ill, people with learning difficulties, in care, bereaved, prisoners, others)
- Participants are my own students or colleagues
- Participants are an over-researched group
- Participants do not understand English / might not adequately understand verbal explanations or written information / have low functional literacy

### **3.1 How are participants recruited?**

The means or methods by which participants are recruited, or the terms of participation, may create ethical issues, as where:

- Participants may be approached in a public space
- Participation is not voluntary, or there is coercion or incentive to participate
- Researcher or Institute / University has a financial interest in the project
- The participant may not be able to withdraw from the project
- Deception is involved: Deception can occur at a variety of levels: for example, at one level, experimental methods may depend on participants being deliberately misled as to the true nature or purpose of the research in which they are taking part; at another, covert participant observation may entail an implicit deception as to the true identity and role of the researcher. Deception may be a legitimate and necessary feature of social scientific research, but its use must always be properly justified.

### **3.2 What are the risks or hazards to participants or researchers?**

Ethical issues encompass risks or hazards that the research may pose to participants or researchers, such as:

- Physical or mental risk or hazard
- Fear or pain / distress / discomfort to the participant or researcher
- Privacy concerns
- Taking of samples e.g. blood, saliva
- Physical contact
- Food or drink is to be administered
- Risk to personal safety e.g. physical or verbal attack; disability or health problems; delayed access to personal or medical assistance; failure of routine or emergency communications; security of accommodation and support; getting lost, or stranded by transport; cultural or legal differences
- Legal risk (eg: participant breaking the law)
- Inconvenience or changes in lifestyle for participants

## **4. What are the confidentiality issues?**

Ensuring informed consent and instituting appropriate data management practices (see also 8 above) are key to ethical research. Ethics questions may arise around such issues as:

- Covert observation of participants in physical or digital environments
- Recording or filming / photography of participants (whether covert or otherwise)
- Issues of confidentiality and privacy, or lack of anonymity (and for example what to do if participants disclose that they have broken the law)

- Security of personal data, retention and disposal of the data

## 5. Where will the research take place?

Ethical considerations can arise from the location where research is carried out. Common locations where SAS researchers engage in research and other academic activities include:

- The project will take place in the premises of the University of London;
- The project or interaction is out in the open, at another organisation's premises, abroad / overseas
- The research will happen in a laboratory in order to conduct set of experiments on participants;
- The project will take place in the UK but the Research will require access to a virtual environment;
- The project will take place outside the UK.

Researchers may require to undertake a **travel risk assessment** (see Section 2.2 above for details) and review **their University Travel Insurance** arrangements if necessary.

Moreover, participants can be involved in a physical (the participants are physically in the same room as the researcher) and/or virtual capacity (the participants are interacting online) or both. Participants can be over the internet, through social media platforms. Where respondents through the internet, e.g. online survey, social media, or other visual/vocal methods can be identifiable, ethical assessment is required and the Data Protection Act applies:

- Social media or other platforms on the internet need to be considered with care in particular when the understanding of privacy is contentious and where sensitive issues could be discussed - for example in 'closed' discussion groups where there is potential for quotes to be identifiable and including where visual images are used.
- Other visual / vocal methods, particularly where participants or other individuals may be identifiable in the material (e.g. images, sound recordings) used or generated also need to be considered with care.

Researchers are invited to check the current guidance on undertaking research virtually. (see 2.6 and the thorough guidance [here \(under updated guidance\)](#).)

### 5.1 Other health and safety issues

You may consider whether you need to undertake a separate **Health & Safety Risk Assessment**, as well as answering this question on your ESAF. If so, please contact the Research Office.

## 6. Safeguarding

Preventing harm in research is part of the mandate of the University's Code of Good Practice in Research and is operationalised through various policies including its research ethics policy, whether the activities take place in the UK or overseas.

As part of project delivery and risk assessment planning, the researcher(s) should refer to the University's Safeguarding Policy [<https://www.london.ac.uk/about/policies/core-policies/safeguarding> ] and carefully consider the guidance on duty of care responsibilities and the advice for those carrying out activities involving children and vulnerable adults.

Third party organisations will often be involved and roles and responsibilities or expectations should be clearly set out, agreed, and reviewed regularly between all parties.

## 7. Am I collecting data?

All researchers need to be aware of how they will be treating the data associated with their research and manage it appropriately. In some areas of research, researchers process the personal data of living individuals and are thus subject to data protection law, currently the General Data Protection Regulation and the UK Data Protection Act 2018. GDPR is about balancing research with the rights and interests of individuals, balancing our legal rights to conduct research in the public interest while applying appropriate protocols and safeguards when managing individual data (from collecting, analysing, storing and publishing, or dealing with any breaches or request under the Freedom of Information Act).

Ethical standards require that you must ensure that you have fully informed the individuals involved in research what will happen to their data as part of the research project and, if relevant, afterwards. All of these points need to be addressed directly in your ESAF submission.

To support researchers in their efforts, you are asked to review the University 's [Data Protection and Academic Research Policy](#) and our [GDPR - Guidance on Data Protection and Research \(under updated guidance\)](#) which outline the University position and expectations on how to deal with data related to individuals.

The University has also created a [Data Management Plan \(under updated guidance\)](#) template which aims to guide all researchers through their thinking process, and define and plan clearly the management of their data, as well as establishing who is responsible for it and how it is going to be stored and made accessible.

A summary of you need to consider is shown below:

### 7.1 What is Personal Data?

**Personal data** is data relating to living individuals, whether hard or soft copy, for example in research this could be: information relating to an identified or identifiable natural person (the 'data subject'). This applies only to living individuals ('this Regulation should not apply to deceased persons').

Individuals can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

**Special Category data** include personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

**Criminal Convictions data** mean personal data relating to criminal convictions and offences or related security measures.

## 7.2 How will you deal with that data?

Firstly, this is done by ensuring and securing interviewees' understanding. Research participants need to receive a [Participant Information Sheet \(under procedures\)](#) which **should** include:

- Enough information, in lay language (which will need to be in a language other than English for non-English speakers), for the participant to understand what the project is about (mandatory project description) and what is required of them so that they know what will happen to their data as part of the research project and, if relevant, afterwards;
- Who they can contact for more information (business contact details) and who is the organisation overseeing the research;
- A date by which participants are able to withdraw their data from the study;
- Assurances and confirmation that their data will be held securely and treated correctly, even if the data is kept after the end of the project.

The participants should then give consent using the [Participant consent form \(under procedures\)](#):

- This should outline all the details of what it means to be a participant of the research to allow participant to agree
- The form needs to be adapted per type of participation:
  - Interview
  - experiment

The School has provided templates which can be adapted to the researcher's needs. If the consent forms and information sheet are circulated online or are part of an online process, they will also need to be structured as per the template.

## 7.3 How do I secure the data?

There are several relevant strategies that may be considered, including:

- Hold it in a secure location, whether electronic or hard copy
- Locked cabinet, password-protected files and shared drives, encrypted lap-top
- Be particularly aware of movable storage media, e.g. USB sticks, lap-tops
- Do not share the data except with co-researchers
- Be aware if you are carrying or transferring data abroad, particularly outside the EEA
- Transfer the data in a secure manner
- Package and address correctly, avoid email if possible
- Guard against unauthorised access or accidental loss, damage, or destruction of the data
- Be aware of the Prevent policy if you are dealing with security-sensitive materials<sup>5</sup>

## 7.4 Can I keep and/or re-use the data?

Anything that you decide should clearly be explained in the participation/consent form and information sheet.

- Decide how long you need to keep it, and for what reason. Don't keep it any longer than necessary
- Decide how long you need to keep the administrative records associated with the project, and for what reason. Don't keep them any longer than necessary

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<sup>5</sup> Please ensure that you have read the UK [Prevent Duty](#) and filled in the self-check list and submitted it, if you are dealing with security-sensitive materials.

## 7.5 How to dispose of the data?

Relevant considerations include:

- Dispose of it securely, whether electronically or in hard copy
- Anonymise the data once collected, for example:
- Separate the data from the identifying details of the participant
- Give the data a code and attach the code to the separate contact details
- Allow participants to choose codes / passwords so that they could be allowed access to their data if necessary / withdraw from the project within certain timescales
- Ensure that data is published only in anonymised form.
- Ensure that the data never causes damage or distress to individuals
- Ensure that it is never used to support measures or decisions relating to particular individuals
- Never use the data you have collected, nor the contact details of participants, for another purpose other than a research purpose

Note: If externally funded, please ensure that **in addition to the above** you have **complied with the conditions of the grant** in relation to retention of data and publication of data.

## 7.6 Collecting data via online platforms

The legal and ethical aspects of using online platforms, (whether by undertaking interviews, or running an online survey, or collecting information on social media), present different challenges than traditional methods. A thorough guidance has been put together and is **available** [here \(under updated guidance\)](#).

A summary of you need to consider is shown below:

- Before considering other aspects of the ethics of your project, you should carefully read through all of the relevant terms and conditions of the platform(s) that you will be using to obtain your data (whether by interviews, or running an online survey, or collecting information on social media).
- The general principles that guide ethical practice in online research are usually the same as those that guide any research involving human beings:
  - Ensure transparency while recruitment, especially while recruiting using an acquired email list or through closed or open social media groups.
  - Consider participants' expectations, perceptions, and awareness about privacy.
  - Protecting the identity of unwitting participants becomes even more crucial when the data accessed refers to sensitive subject matter, particularly when exposing such data in new contexts and to new audiences as it may place the users at potential risk;
  - Ensure compliance to national data protection laws and the applicable ethical codes.
  - Use a password identity system to ensure authentic participants.
  - Ensure that consent is informed and knowledgeable.
  - Ensure that a privacy statement is provided which explicitly mentions purposes for which the data will be used, participants' rights, and strategies adopted by the research team for maintaining anonymity, confidentiality, and data protection.
  - Remove all identifiers before data analysis/ Assign each participant a unique identification number/code to track progress and maintain security.
  - Provide opportunities to participants to reach the research team or clarify any concerns.



- Honour participants' request to delete their records.
- Use password protected computer directory to store the data.
- Ensure that data are not used for subsequent non-research purposes
- Consider whether it is ethically sound to share your data set, as well as checking the platform terms and conditions to determine whether they allow or prohibit it. If it contains data that could cause harm if re-published, then either the sensitive data should be removed or paraphrased, or the data set should not be shared at all;
- It is recognised that each type of online research method (i.e., observational, interactive, or survey/interview research) is highly contextual and involves different levels of engagement and interaction between the participant and the researcher, which has implications for ethics. But the process of evaluating the research ethics cannot be ignored simply because the data *seem* public as questions of whether the data is public or private relate to the extent to which we are ethically bound to seek informed consent from social media users.

## 7.7 Using AI generative tools

AI is transforming academic practices, necessitating broader integration and ethical use in research. The University is developing its own policy which will be issued shortly. Meanwhile, the guidelines on the responsible use of generative AI in research developed by the European Research Area Forum provides a good indication of expected use and behaviour of researchers.<sup>6</sup>

Namely, **Researchers must use AI responsibly by**

- remaining accountable for the integrity of their content generated by or with the support of AI tools.
- maintaining a critical approach to using the output produced by generative AI and are aware of the tools' limitations, such as bias and inaccuracies.
- Refraining from using fabricated material created by generative AI in the scientific process, for example falsifying, altering or manipulating original research data.
- detailing which generative AI tools have been used substantially<sup>7</sup> in their research processes.
- Due to the random nature of generative AI, remember to aim for reproducibility and robustness in their results and conclusions.
- Respecting privacy, confidentiality, and intellectual property rights when sharing sensitive or protected information with AI tools.
  - For avoidance of doubt, **No Researcher is allowed to add any confidential research Data to any AI tool for any purposes.**

This does not include Nvivo, which is a **University-authorised platform** for the sole purpose of supporting the research to format and understand their own data.

Researchers take care not to provide third parties' personal data to online generative AI systems unless the data subject (individual) has given them their consent and researchers have a clear goal for which the personal data are to be used so compliance with local and international data protection rules is ensured.

The output produced by generative AI can contain personal data. If this becomes apparent, researchers are responsible for handling any personal data output responsibly and appropriately, and EU data protection rules are to be followed.

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<sup>6</sup> [chrome-extension://efaidnbmninnbpcjpcglclefindmkaj/https://research-and-innovation.ec.europa.eu/document/download/edc8027b-2811-4347-82f4-fa8b29ece534\\_en?filename=ec\\_rtd\\_ai-guidelines-factsheet.pdf](chrome-extension://efaidnbmninnbpcjpcglclefindmkaj/https://research-and-innovation.ec.europa.eu/document/download/edc8027b-2811-4347-82f4-fa8b29ece534_en?filename=ec_rtd_ai-guidelines-factsheet.pdf)

<sup>7</sup> Must be written in the ESAF. Reference to the tool could include the name, version, date, etc. and how it was used and affected the research process. If relevant, researchers make the input (prompts) and output available, in line with open science principles.

- Researchers need to understand the technical and ethical implications. They need to be mindful of, for example, the privacy options of the tools, who is managing the tool (public or private institutions, companies, etc.), where the tool is running and implications for any information uploaded. This could range from closed environments, hosting on a third-party infrastructure with guaranteed privacy, to open internet-accessible platforms.
- Researchers must remain mindful that generated or uploaded input (text, data, prompts, images, etc.) could be used for other purposes, such as the training of AI models. Therefore, they protect unpublished or sensitive work (such as their own or others' unpublished work) by taking care not to upload it into an online AI system unless there are assurances that the data will not be re-used, e.g., to train future language models or to the untraceable and unverifiable reuse of data.
- Refraining from using generative AI tools in sensitive activities or research; including security sensitive materials.

## C. Contact

For further information, please contact the Research Office via [research.ethics@london.ac.uk](mailto:research.ethics@london.ac.uk) .

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