



Appendix 2

University of London Worldwide Ethical Approval Process and Guidance

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University of London provides degrees through online, flexible and distance learning programmes. In most programmes responsibility for ethical approval of research and project activities undertaken by students, falls under the University of London Federation Member which owns the intellectual content of the programmes. In the event the University of London owns the content and manages the course, the research ethical approval responsibility falls under the University of London as noted in the Research Ethics Policy.¹

Guidance on Research Ethics for University of London Online and Distance Programmes in scope

All students undertaking a Project/Dissertation/Research module are required to submit an Ethics Checklist by week 5 of their module.

IMPORTANT note: Requirements for further ethical approval beyond the checklist provided below may result in your coursework submission being delayed, as further consideration will be required.

To ensure that your activity conforms to general ethical principles and standards you will need to complete the process outlined here. The process is to ensure you and your online tutor carefully consider the implications and methodology of research involving participants and/or study of real-world data. Your research/project/dissertation must conform to the University of London Research Ethics policies and expectations:

You should ensure you are able to identify ethical implications as well as act in an ethical manner when engaging in research.
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Research is designed, reviewed and undertaken to ensure integrity, quality and transparency. Activities which involve research or studies on human participants or involving data relating directly to identifiable human subjects, will always require formal ethical consideration and a review may be needed where other factors could be present including:

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| <ul style="list-style-type: none">• A risk or harm to the researchers or the participants;• Political or social sensitivity;• Impact on culture and cultural heritage. |
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Participants must be fully informed about the research or study they are invited to participate in and their consent to take part must be made voluntarily, freely and without any coercion.
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Risks are managed so that harm and/or damage arising from the research is avoided wherever possible and measures should be taken to ensure that the benefits of research/study outweigh any potential harm or damage caused.
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The independence of the research is clear, and any conflicts of interest or partiality is explicit.

¹ <https://www.london.ac.uk/research-ethics>

Information on the Ethics Checklist:

You must first declare via the self-evaluation form whether you foresee ethical implications. When you need to submit this form will be identified for your specific programme, but is likely to be around 5 or 6, giving you time to receive feedback and adapt accordingly. The ethics submission timetable is as follows:

Activity
Learners start to engage with Research Ethics application process
Learners submit ethics Form.
Tutors review ethics form.
Tutors identify whether further action is required.
Research ethics application by student may be approved by tutor or escalated
If escalated, the Module leader will decide if your application needs to go through a full research ethics review or can be approved at this stage
Student who have their application escalated can choose if they wish to resubmit an ethics form with a different research methodology or continue with their original plan. This may delay submission whilst research ethics application is undertaken at committee-level.
Research ethics for the project/dissertation/research is submitted for those with no action on ethics required.

To reiterate - If the ethical implications have been referred to committee for review, you will not be permitted to commence the Project/dissertation/research until the committee has given permission.

Preparing your research plan – ethical issues to consider:

What will be required of the participants?
Is this essential for the achievement of the research aims?
What, if any, risks might this create for participants?
How can the risks, and the intrusion into their lives, be kept to a minimum?
Participants must understand what they are being asked to commit to. You must ensure that the information you provide is clear and comprehensive, and that participants understand they can opt out at any time without explanation.
You must ensure that there is no undue pressure to participate.
If the research involves vulnerable groups, and/or the proposed participants will not be capable of giving informed consent to participate, you must ensure that they are adequately protected. You should engage with someone who is qualified to speak for them, for example, a parent in the case of children, or expert intermediation for other groups;
You should consider whether your study is likely to be affected by any legislation and, if it is, it is your responsibility to ensure that you comply;

Information given by participants must be protected by anonymity, unless otherwise specified and agreed in writing, and the original data must be adequately safeguarded, following the guidelines of the Data Protection Act 1998. A clear data management plan is required.

Areas not requiring ethical consideration, if they exclude the above list:

It is not normally necessary to obtain ethical approval for research using anonymous data obtained in the course of supplying a service which those concerned had chosen to receive, for example customer research.

Research using student performance data, or asking students to complete a questionnaire, for the purpose of improving teaching and learning, or a survey by HR to develop a new employment benefit, would be considered part of the existing relationship between the researcher and the participants.

Areas of methodology you need to consider:

Use of video or CCTV	Increasingly researchers are using camera-visual methods to study human behaviour. Such research has to be conducted within the terms of the Data Protection Act 1998.
Anonymity	The provider of the information cannot be identified. This requires techniques such as anonymous coding, with the code key being safeguarded appropriately such as electronically protected adequately by encryption or password.
Secondary use of data:	Safeguarding anonymity is an issue to be considered if you are proposing to use anonymised data which has been collected and is held for other purposes. If you are using an existing data set, you must satisfy yourself that those who gave the information originally had consented to its use in the way you intend.
Confidentiality:	Information provided by the participant will not be shared with anyone (except as stated and agreed – usually in writing - with the participant) but the provider of the information is identifiable by name or by other means to those with access to the data. If this is the intention, it must be made absolutely clear in the information provided to participants. It must also be made clear if participants are to be quoted and their specific permission obtained to do so.
Attribution:	The participants agree to be quoted, on the terms which should be specified clearly in the prior information, and/or as the participant agrees with the researcher. It is entirely up to the participant to accept this or not.

Recording interviews and copyright	<p>The problem of copyright ownership potentially arises when a researcher makes an audio or video recording, or notes down an interviewee's words verbatim. For question and answer interviews, there is usually no problem, and copyright in the recording belongs to the researcher.</p> <p>However, if the recording is of something which is recognisable as a work - a story, or some kind of performance (e.g. a song, a dance, a poem etc.), then under English law the copyright belongs to the interviewee.</p> <p>However, if there are plans to make commercial use of the recording, e.g. as part of a DVD or by including a transcript in a book, then the simple licensing approach above may not be adequate to satisfy a publisher. In that case, either the interviewee needs to be approached for a further, more appropriate licence, or advice needs to be taken about how to secure the necessary rights in an ethical manner.</p>
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Guidelines on data security:

<p>Information stored on computers/laptops or memory sticks should be protected in accordance with its sensitivity.</p>
<p>At a minimum, confidential information should be stored in a password-protected *folder*, so that a person who gains access to the computer/stick does not automatically gain access to the folder. The password should be hard to guess, and not written down in proximity to the computer/stick.</p>
<p>For more sensitive data, encryption technology should be used to provide a greater level of protection.</p>
<p>Online storage followed by deletion from the computer/stick can be more secure and is worth considering.</p>
<p>The online service provider should be chosen by relevance to the nature of the information to be stored. Commercial services such as Dropbox or Box should be adequate for low sensitivity information. Highly sensitive information should be uploaded to the University server.</p>
<p>Access to the online storage should be password protected and:</p> <ul style="list-style-type: none"> • The password hard to guess and not written down; and • The password not saved on your computer. • Where sensitive information has to be stored on a commercial service it should be encrypted before uploading. • Care should be taken when using internet cafes and other open-access computers. Password entry should not be viewable by other users, and the browser cache should be cleared before leaving the computer.
<p>The encryption/security built into commercial applications such as Word and Acrobat is trivial and can be defeated with easily available software tools.</p>

Take advice on which encryption technology provides appropriate protection.
Backup copies need the same level of protection as main copies.

Vulnerable groups – Research ethics needs to be considered if your research involves any of the following:

Persons under 18
Children in care
Those with a learning disability
Those suffering from dementia
Prisoners
Young offenders (16-21 years old)
Those who could be considered to have a particularly dependent relationship with the investigator (e.g. those in care homes, students, employees)
Those whose relationship with the researcher or with the community to be researched might be subject to peer pressure or coercion e.g. students, or patients of doctors making the approach.
Others who could be considered to be in a vulnerable situation (e.g. homeless, asylum seekers)

Please note the following carefully:

The following – not an exhaustive list - would be considered to be vulnerable and requiring special care in approaching them, in providing information, and to ensure that their consent is sufficiently informed:

Parental consent must be obtained for children and young people aged 17 and under.

Disabled people, especially those with a mental disability, should only be approached through or with the support of qualified intermediaries.

Those with limited understanding of English: special care should be taken to ensure they understand what is being asked and what they are committing themselves to. If there is need for two-way translation, the research should allow for this.

DBS checks are not required for researchers unless they will be in regular and unsupervised contact with children or other groups listed above.

Whilst working in a school environment, researchers are required to make themselves aware of, and adhere to, the individual school's Child Protection Policy. If applicable, they should also make themselves aware of the individual school's policy on videoing/photography. Researchers who wish to work independently with children will be required to obtain a DBS

check and to also make themselves aware of the local authority's Safeguarding Officer for Child Protection so that they are sure of who immediately to contact should any concerns arise.

Payment of participants: No payment for participants is possible for this type of research.

Recruitment and information: All communications with participants and potential participants (and parents or intermediaries where appropriate) must be succinct and clear in layman's language. Your participants will probably know nothing about your academic discipline, and its terminology could well be meaningless. So communications must be simple, in everyday language, and short, designed to meet the needs of the particular audience. Model information sheets and consent forms are attached.

Recruitment of participants should be undertaken in such a way that participation is truly voluntary and there is no coercion, either explicit or implicit (e.g. peer group). The Committee prefers the use of indirect approaches rather than face to face individual requests to potential volunteers. Ideally individuals should be able to take a positive step to participate rather than have the discomfort of declining a direct approach. Posters, leaflets, emails, or other forms of circular (e.g. in a club members' newsletter) may be used to recruit participants.

If another organisation's premises or services are to be used for recruitment publicity, the Committee will expect the permission of the owner/person in charge or the service provider to have been obtained.

Recruitment material should describe the purpose of the study, what participants will be required to do, where and when they will need to do it, and what they will get out of their participation. Any risks should be indicated in the ethics submission.