



Research Ethics Policy and Procedures

1. Statement

1. The University of London is committed to carrying out its research, teaching, consultancy and other activities within a comprehensive ethical framework.
2. The purpose of this Policy is to:
 - Set out the principles applicable to all research, consultancy projects and studies conducted at, by, or in the name of, the University of London;
 - Provide members of the University with a clear understanding of the ethical review process operated by the University; and
 - Support a culture of academic freedom and excellence by providing a framework for review, which subjects research proposals and other studies to a level of scrutiny that is in proportion to the risk of harm or adverse effect to participants, researchers, the University and to society as a whole.
3. This Policy is managed and monitored by the University of London Research Ethics Committee, which may decide to develop additional guidance or policies as code of practices across the UK and the worldwide research landscape evolve.
4. The procedures instituted in pursuit of this policy are intended to:
 - Facilitate, not inhibit, research;
 - Promote a culture within the University whereby members reflect on the ethical implications of their work;
 - Apply principles whereby all those involved in research in the University equally take responsibility for the consideration of the ethical aspects of their research.¹
5. The Research Ethics Policy is an integral part of the University Code of Good Practice in Research. It should also be read in conjunction with the University Travel Policy as well as its Data Protection and Academic Research Policy and supports the University Safeguarding Policy.¹

2. Scope

1. This Policy aims to cover the University's academic departments and their multi-disciplinary activities and as such applies to all disciplines and research activities within the University including collaborative research, or sub-contracted on its behalf.
2. This Policy brings the University in line with the national and international research and higher education councils' framework for research ethics, as well as the UK policy on Prevent.
3. This Policy applies to all staff, students and fellows of the University engaged in studies or research as well as visitors, individuals, collaborators, or agents conducting research or other studies in the name of the University and/or engaged to conduct research by the University. It extends to cover consultancy and enterprise activities.

¹ <https://www.london.ac.uk/research/research-governance#policies-and-protocols-32231>

3. Principles

1. All members of the University should ensure that they are aware at all times of how to identify ethical implications as well as act in an ethical manner when engaged on University business.
2. Studies and research should be designed and undertaken to ensure integrity, quality and transparency. Formal institutional review and approval will always be required to guarantee the ethical soundness of University research projects, in particular where other factors could be present including:
 - A risk or harm to the researchers or the participants;
 - Political or social sensitivity;
 - Impact on culture and cultural heritage.
3. 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.
4. Risks should be managed at all times 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.
5. The independence of the research/study must be clear, and any conflicts of interest or partiality must be explicit.
6. The same high ethical standards shall apply wherever in the world the study/research is undertaken in the University name or in association with the University.
7. The University is committed to upholding the Policy by communicating its standards, policies and procedures to staff through education and training, publication of this and related policies and procedures.

4. Ethical Review Process

1. All research projects within the University must be checked for their ethical implications before the research takes place.
2. The University has three departments for which an ethical review process is required:
 - a. The School of Advanced Study – please see Appendix 1 for details
 - b. University of London Worldwide - please see Appendix 2 for details
 - c. University of London Institute in Paris - please see Appendix 3 for details
3. All researchers must review their relevant department's guidance, fill in the appropriate ethical form and submit it to the relevant services.
4. Ethical reviews are undertaken by relevant offices within each department. However, should significant ethical issues be raised by the research, including research characterized by one or more of the following features such as:
 - (i) Research involving deception of participants, or which is conducted without their full and informed consent at the time the study is carried out or when the data is gathered, or which involves the use of confidential information;

- (ii) Research involving more than minimal risk of harm to participants, such as: research involving vulnerable groups ;
- (iii) Research involving personally intrusive or ethically sensitive topics;
- (iv) Research which would induce unacceptable psychological stress, anxiety or humiliation or cause more than minimal pain ;
- (v) Research which covers security-sensitive subject and material;
- (vi) External obligations require it;
- (vii) Research undertaken by a student or member of staff who has not received appropriate training or has insufficient experience in research ethics and has been unable to access appropriate advice or support.
- (viii) Research that is undertaken, on behalf of the student/researcher, not by the student/researcher himself/herself, but by a third party not associated with the University;

Ethical approval will need to be sought via the Research Ethics Committee.

5. Ongoing review of ethical implications must take place as it is important for all parties (researchers and the University) to remain aware of any potential risks to all groups involved in research throughout its lifetime, including the dissemination phases. Consideration to emerging ethical concerns not only on set projects but on ongoing research should be carefully undertaken and as such researchers and line managers should ensure that they review their projects regularly. Any changes should be immediately reported to the relevant offices which will advise whether further review and approval are needed.
6. Chair's action is undertaken if:
 - There is an amendment to a currently approved project, for example changes to the method of participant recruitment, or changes in the method of data collection;
 - The project is an extension to an existing project, or is a new project re-using existing data.
7. If in exceptional circumstances a researcher did not obtain ethical approval BEFORE undertaking the research project, the student or researcher must immediately contact the relevant department to ask for a retrospective approval by providing a full statement to explain the reason(s) why the approval was not sought in time. There is no guarantee that retrospective approval will be given. Depending on the outcome, any data collected may have to be destroyed and disciplinary actions may be taken.

5. Roles and Responsibilities

1. Research Ethics Committee (REC)

- a. Has overall responsibility for the ethical review process and granting approval for individual projects and studies.
- b. Committee is chaired by the nominee of the Dean and PVC (Research & Engagement) of the University of London.
- c. Membership includes all the departments of the University which would require ethical approval.
- d. Is responsible for developing, keeping under review and monitoring the implementation of the Research Ethics Policy, and for sustaining a wide awareness of research governance on ethical and related issues.

- e. Is responsible for developing policies and guidance in these areas, for reviewing reports from the Research Services and for ensuring information and changes on University indemnity insurance, travel and legal policies are up to date.
 - f. Is committed to providing a competent, rigorous and independent process of ethical review for the research and studies undertaken proportionate to the risk involved.
2. While particular attention must be paid to the interests of potentially vulnerable groups, such as children, the University via the REC recognizes that it has a duty of care towards *all* members of the wider community affected by its activities and to its own staff, and that this includes the avoidance of harm to those undertaking research and taking part in the University research.
 3. Members are committed to declare any conflict of interest at the point of ethical scrutiny and withdraw from the decision process.
 4. The REC will only directly intervene where study has not received formal approval or in any cases where it perceives an immediate risk to the health or well-being of researchers or participants, or to the integrity of the University.
 5. The REC can in extreme cases recommend sanctions including disciplinary procedures. (see Section 5)

2. Research Services

The primary function of the Research Services (RS) is to:

- a. Coordinate the ethical processes across all departments on behalf of the Research Ethics Committee as well as manage the ethical process within the School of Advanced Study, including reviewing the self-evaluation form and relevant documentation submitted by researchers and managing the assessment results;
- b. Keep a register of all evaluation documents that are submitted and their approval status;
- c. Report on the activities across the University. In the event that the RS discovers any failure to comply with this policy, it will refer its concerns to the REC;
- d. Provide guidance and offer training, in collaboration with other departments within the University, as well as offer advice to researchers when submitting their assessments.

3. Members of the University

- a. This Policy applies to all members of the University engaged in research:
 - Academic and academic related members of staff, including Library staff,
 - All Internal and External Supervisors;
 - Contract research and administrative staff,
 - All postgraduate research and masters students
 - Visiting fellows or research fellows, while hosted at the University;

As well as visitors, individuals, collaborators, or agents conducting research or other studies in the name of or at the University and/or engaged to conduct research by the University.
- b. All staff, students and fellows are expected to act ethically when engaged in University business and as such to take personal responsibility for familiarizing themselves with this Policy, and with the procedures they need to follow for the research or studies they undertake.

- c. All staff, students and fellows must ensure that they have received appropriate training (including access to online module), ethical approval as well as confirmation that they are covered by the University indemnity insurance, **prior to starting their research or any study**. Failure to do so may have consequences on their projects, studies or fellowships.
- d. All staff, students and fellows must ensure that any risks when travelling to certain areas and/or countries, in particular those demonstrating political unrest, to research particularly sensitive subjects, had been thoroughly taken into consideration. All staff, students and fellows must ensure that they are adequately insured and briefed about personal security and that they are aware of the Safeguarding Policy and their responsibility to report any concerns to the University.
- e. It is the responsibility of the Principal Investigator for any research/study to ensure that all their colleagues involved in that research/study are aware of and comply with the policies of the University.
- f. It is the responsibility of the supervisors to be aware of the policies and guidance and appropriately advise students.
- g. All staff, students and fellows are required to ensure that their research or other studies are conducted in accordance with the ethical requirements of their funding body.

All staff, students and fellows are required to ensure that all the data collected and used for their research is dealt with in a secure and ethical manner, as per the University Data Protection and Academic Research Policy and the Research Data Management Policy.

- h. All staff and fellows who are bringing their research to be conducted at the University but for which ethical review was sought by former-home institution must provide evidence of ethical review and approval to the Research Ethics Committee via the Research Services.

6. Appeals

1. Where a Researcher has a concern about the decision of the REC to withhold, suspend or withdraw ethical approval of their research/study, they should contact the RS, who will be in touch with the Chair of Committee.
2. The Dean of the School of Advanced Study and PVC (Research & Engagement of the University of London) is the authoritative person should an appeal be made. The Dean will be contacted by the Chair of the Committee to ask him/her to review the appeal request.
3. Appeals will only be permitted on one of 2 grounds:
 - a. That the researcher possesses new evidence that was not available at the time the REC made its decision and it has subsequently refused to consider such evidence; or
 - b. That there had been a procedural failure which had affected the decision of the REC.

4. Upon receiving the appeal request, the Chair of the REC will review the request and confirm that it has been received within one week. The Chair of the REC will then refer the appeal to the Dean of the School and PVC (Research & Engagement), whose decision would be expected to take two weeks.
5. The decision of the Dean of the School and PVC (Research & Engagement) is final and will be communicated by the Research Services.

7. Audits & Sanctions

1. Audits may be undertaken. Should such audits reveal potential infringements to the Research Ethics policy, a full investigation will be undertaken under the Chair of the Research Ethics Committee's guidance. Should the investigation's findings confirm that the Research Ethics Policy was breached, the matter will be raised with the Research Ethics Committee to agree on the appropriate course of action.
2. Any breach of this Research Ethics Policy will be taken extremely seriously, and may result in disciplinary actions including:
 - Proceedings for gross misconduct where the breach is committed by a member of staff, including academic, academic-related, library, contract research and administrative staff,
 - Formal disciplinary proceedings under the relevant University procedures where it is committed by a student;
 - Visitors, fellows, collaborators, individuals or agents breaching this policy may have their visitor status reviewed or withdrawn.

*Research Ethics Committee
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