REGENT'S
UNIVERSITY LONDON

Academic Ethics Review Policy

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Policy version tracking

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1.1.	April 2016	Initial approval by Senate	DVC	Published
1.2.	May 2019	Review by SRC and approved by Senate	DVC	Published
1.3	November 2022	Research Ethics Policy was revised and re-named the Academic Ethics Review Policy. Approved by Academic Committee Nov 2022	Associate Provost (Research Lead)	Approved
1.4	October / November 2023	Minor revisions made to REP name and appeal section to align with updated processes. Approved by Academic Committee Nov 2023.	Head of Governance	Approved

1. Introduction

The Academic Ethics Review Policy (AERP) provides the framework for the ethical consideration of academic work across the University. This policy refers to staff and students, and to other persons engaged in any University-led academic activity that has ethical considerations as outlined below as a condition of their being granted access to the University's premises or facilities, whether the activity is conducted on the University's premises, off-site, or online.

Ethical approval is required prior to commencement of any research, dissertations, projects, content creation, and performances involving data collection, interaction with human participants, or collecting human personal data. Failure to gain ethical approval prior to conducting any project that requires it, breaches the terms of the AERP, and may constitute academic misconduct for student applicants and a disciplinary matter for staff applicants.

Reference should also be made to professional ethical expectations where appropriate (e.g., where there is professional body accreditation).

2. Aims

The purpose of the policy is to foster a culture within the University that embraces the principles set out here and the obligations contained in relevant legislation to protect the rights, dignity and welfare of those invited to participate in academic projects; providing ethical guidance that communicates regulatory requirements and best practice, and offering ongoing support and training to staff and students to maintain high ethical standards in their academic work; maintaining a review process that subjects those activities to a level of scrutiny proportionate to the risk of harm or adverse effect.

Objectives:

- To ensure that all research and other academic activities that involve human participants undertaken at Regent's University London is scrutinized by more than one person to ensure that it complies with agreed ethical standards;

- To provide academic staff with the experience of the ethical scrutiny of research and academic activities that involve human participation, thereby disseminating knowledge and good practice about ethical issues;

- To appropriately educate and inform students of the ethical dimensions and responsibilities of academic activity;

- To facilitate the efficient and prompt consideration of proposals and relevant activities without sacrificing the rigour of the scrutiny process.

4. Principles and Commitments

Rigour:

Regent's University London is committed to ensuring that academic activities involving human participants and personal data are conducted in a way which; respects the dignity, rights, and welfare of all participants; minimizes risk to participants, students, staff, and third parties; appropriately manages personal data; and maximizes the public benefit of the activity.

The University meets this commitment by:

- Requiring that projects and learning activities are designed and undertaken (where appropriate, under qualified supervision) in a manner that evinces a commitment to accountability and quality;

- Setting appropriate standards for the conduct of activities involving human participants and personal data that are in line with current legislation and best practice;

- Identifying and reviewing all academic activities involving human participants and personal data in proportion to the level of risk, irrespective of whether the ethical standards of that activity are additionally secured by another recognized approval procedure, for example that of the National Health Service;

- Ensuring that relevant academic activities comply with current legislative requirements such as those on data protection; Once printed this document is considered an uncontrolled version. For the current version refer to Regent's intranet or website 3 of 7;

- Ensuring that the dissemination of research and other academic outputs is accurate and appropriate.

Respect:

The University is committed to ensuring that all research and academic activities involving human participants and personal data contributes to the public good, and that the dignity, rights, and welfare of those conducting the project, subjects and third parties (which may include family members, carers, colleagues, or the wider community) are respected.

The University meets this commitment by:

- Avoiding harm to people involved in or affected by research projects or any academic activity involving human participants through the early identification and considered assessment of risk;

- Requiring that participants be fully informed about the purpose and intended uses of the research or project, what their participation involves, and details of any risks ensuring that consent to participate is informed, valid and freely given prior to the commencement of the project; this will normally be through a participant information sheet and signed consent form;

- Respecting the participant's right to withdraw at any time without adverse consequences; observing the confidentiality of information provided by participants and, where appropriate, respecting their anonymity;

- Following correct procedures of disclosure to the relevant authorities when working with vulnerable groups such as children or vulnerable adults.

Responsibility:

The University is committed to providing leadership in ethical conduct of research and to participating openly in discussions on the direction of research and improvements to practice in this area.

The University meets this commitment by:

- Contributing, listening, and responding to public debate that concerns the ethical consideration of academic projects involving human participants and personal data;

- Working closely with relevant peer groups and government agencies to remain abreast of developments and informed of UK (United Kingdom) policy;

- Maintaining open and transparent procedures relating to the conduct and review of academic activities.

Education, training, and personal development:

The University is committed to sustaining and encouraging the ethical conduct of academic work among members of the University. This is achieved by the provision of training to equip them with the skills to recognise potential risks and by raising awareness of the University's policy, procedures, and responsibilities thus ensuring the University meets its obligations under the relevant legislation.

The University meets this commitment by:

- Communicating the University's policy effectively;

- Promoting awareness of best practice through education and training;

- Providing appropriate training for both those undertaking academic activities involving human participants and personal data, and for those responsible for ethical review so that knowledge and skills are up to date;

- Fostering an environment of openness and integrity that encourages collaboration and early communication of potential risks.

Tutors, supervisors, module leaders and programme leaders must ensure that ethical training and instruction in the use of the Ethical Approval Portal (hereafter EAP) is embedded in all modules that engage with human participants.

Course Leaders and Directors (Content) must use oversight to ensure all students are made aware of and can use the EAP as part of the curriculum where there is engagement with human participants.

5. Criteria covered by review at each stage

Following the principles and commitments in section 4, reviewers will be scrutinising proposals in respect of:

- Aims of project/benefits to participants/society

- Appropriate design and method

- Participant selection

- Informed consent

- Participation of vulnerable groups (if any)

- Data collection process

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- Data analysis

- Risk analysis undertaken (to applicant, participants or any third parties)

- Data protection and secure storage

- Dissemination.

6. Ethical review and approval process

The formal procedure for application for ethical approval is set out on the University's Website.

Applicants (other than doctoral students – see below) must use the University's online Ethical Approval Portal to seek ethical approval.

Applications through EAP are compulsory for all projects and assignments that involve human participants (defined but not limited to interviewees, performers, clients, etc.)

Academic Staff Research

- All applications are made directly via EAP and reviewed by the University's Research Ethics Panel (REP).

Doctoral research students

- Research proposals will be submitted through the processes established with our validating partners.

Students following Undergraduate and taught Postgraduate programmes

For capstones, dissertations, final projects, or equivalent, students should be suitably supported within the module to submit applications via EAP whether involving human interaction or not, and before any human interaction commences within the project:

- Applications are reviewed by the student's supervisor/tutor and at that stage they may provide feedback and require changes before advancing the application;

- Once the supervisor/tutor is satisfied that the submission meets appropriate ethical standards the application is reviewed by the Module Leader and will determine 'low risk' or 'high risk';*

- Low risk applications if complete are deemed approved at this stage and the student notified;

- High risk applications are referred for further consideration by the University Research Ethics Panel;

- Course Leaders are automatically notified of progress at each stage and will monitor the process for their programme.

*See appendix 1 for examples of high-risk scenarios.

For projects in other modules that involve human participants (e.g., interviewees, performers, clients) an application must be made by the individual student as directed by the tutor before human interaction commences on the project. The process is then as above.

For assignments on any module that requires student interaction with human participants or their personal data, before the commencement of the module

- The module leader must submit the assignment brief through the online portal;

- This will then be reviewed by the Course Leader who will determine 'low risk' or 'high risk';

- Low risk applications if complete are deemed approved at this stage and the Module Leader notified;

- High risk applications are referred for consideration by the University Research Ethics Panel;

- For assignment briefs set in module specifications at validation, ethical approval can be sought for the entire period granted at validation;

- For those which vary year-to-year, ethical approval will need to be sought by the module leader before the commencement of teaching each academic year.

*See appendix 1 for examples of high-risk scenarios.

7. Appeals

Applicants may appeal an ethics review decision to withhold, suspend or withdraw ethical approval of a project/assessment by contacting the Chair of the Research Committee, who will then arrange an appeal panel. If the decision being appealed was *not* initially taken by the Research Ethics Panel, then the Panel may consider and determine the appeal. If the decision being appealed was a decision made by the Research Ethics Panel, then the Research Committee Chair will appoint an independent appeal panel, formed of three members of academic staff who have experience in determining ethical applications and who have not be involved in the decision that is being appealed. In all cases, the proposer will also be invited to the appeal, but it will go ahead whether they attend or not. Appeals must be lodged within ten working days of communication of the outcome. The decision taken by the appeal panel (whether this be the Research Ethics Panel or another independent panel) is final.

8. Review of the Policy

The Research Committee will keep under regular review, all policies and procedures relating to the ethical conduct of research involving human participants and personal data. A report on the outcomes of the research ethics process will be provided to the last Research Committee of each academic year by the Chair of Research Ethics Panel.

APPENDIX 1 -- Examples of high-risk project scenarios.

Do bear in mind that the scenarios do not automatically mean the project cannot be done, but just that the project needs to be identified as 'high risk' so that the full REP can scrutinise how the risk is managed and whether any legal or safeguarding implications have been considered in full.

The list is indicative, not exhaustive:

- Participants include minors (under 16)

- Participants include vulnerable adults

- Photographs, video, or film can be used to identify an individual (not credited actors or models of course)

- Study involves the discussion of sensitive topics

- Could the study induce psychological stress or anxiety, cause harm, or have negative consequences for the participants

- Financial or other inducements will be offered to participants

- The personal data collected includes special category data or any information about actual or alleged criminal activity or criminal convictions which are not already in the public domain

- The project outcome includes identifiable personal information i.e., data at an individual level in a form which identifies or could enable identification of the individual

- Identifiable participant data is likely to be transferred outside the European Economic Area

- Will the project take place outside the UK and/or specifically target a country outside the UK

- Will the project include participants without their knowledge or consent.