Code of Practice for Applying for Student Ethical Approval at

University Centre Peterborough

July 2024

Version 8

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Introduction

This Code of Practice is intended to provide student researchers with the key information they will need when applying for ethical approval from University Centre Peterborough. It should be read in conjunction with our *Research Ethics Policy*, *Question Specific Guidance* and with other documents as referred to below.

Applicants for ethical approval are required to declare that they have consulted the *Research Ethics Policy*, and relevant sections of this *Code of Practice for Applying for Ethical Approval at University Centre Peterborough* (hereafter referred to as the Code of Practice), as part of their Staged Ethics Procedure (STEP) application.

To ensure a coherent approach, all students conducting research via UCP are subject to STEP.

It is important that researchers at UCP understand that they are responsible for complying with all legislation relevant to their research, including that which is enacted after research has commenced (and may necessitate new approvals). This policy and associated documents are intended to provide guidance, but cannot replace the individual responsibility that each researcher bears in this respect.

Frequently used acronyms

STEP = Stage 1 Ethics Procedure
Ethics Committee = A collection of academics at UCP including a Chair, Vice Chair, and reviewers who will consider ethics applications, provide feedback, and make judgements on ethics applications.
RSAC = Research and Scholarly Activity Committee

* STEP1 is proposed from September 2022 to review low and middle risk research applications. There are no plans for STEP2 at this time - this would be a panel for reviewing high risk research applications. Until such a time as STEP2 is in operation, STEP will refer to RSAC for guidance.

Useful contacts

Title	**Name and email**	**Telephone**
Ethics Committee email	ethics@ieg.ac.uk	
Ethics Committee Chair	Blair Carter Blair.carter@ieg.ac.uk	01733 214466
Ethics Committee Vice Chair	Claire Bowes Claire.bowes@ieg.ac.uk	01733 214466

Ethics Committee Executive Secretary	Kam Agina kam.agina@ieg.ac.uk	01733 838223
Data Protection Officer	Rob Cottrell dpo@ieg.ac.uk	01780 484300

RSAC Chair	Katie McAllister katie.mcallister@ieg.ac.uk	01733 838237

Overview of Ethical Approval Requirements

1.1 Whose research requires ethical approval?

The requirements for ethical approval outlined in this Code of Practice apply to all student researchers, to all research project types, and all categories of risk.

Our *Research Ethics Policy* defines the term 'researcher' to mean **all final year students undertaking their dissertation projects, or equivalent,** at University Centre Peterborough. This policy applies to all researchers, whether on or off our premises or in collaboration with our staff and/or students, including on a consultancy basis. This includes those doing research on a collaborative basis, even if another institution is the lead Higher Education Institution/organisation. Specific guidance for staff is included within the Ethics Policy.

UCP's ethical approval does not automatically cover collaborators at other institutions. In cases where UCP is the Lead Institution you need to ensure that collaborators have checked their own ethical approval and insurance arrangements and confirm this in your ethics submission. Where another institution is the Lead, you need to check with the STEP Chair if further approval is required and also check your own insurance arrangements.

Please note that you cannot start collecting data from participants until you receive confirmation from UCP that you can proceed with your research.

1.2 Why does research require ethical approval?

As part of good research governance, research requires ethical approval. This is:

- because a consideration of the ethical issues is likely to help you think about the stages of your research more carefully
- to avoid potential problems later on, by ensuring that the main ethical issues are addressed before the research starts
- to protect the rights and welfare of participants and minimise the risk of physical and mental discomfort, harm and danger from research procedures
- to protect your rights as a researcher to carry out legitimate investigations

- to protect the reputation of University Centre Peterborough in respect of research conducted by its students

- to ensure that you are insured to carry out your research

- to minimise the potential for claims of negligence made against you, University Centre Peterborough and/or any collaborating individual or organisation

- because refereed journals increasingly require evidence of ethical approval before they will publish your work.

1.3 When should I start thinking about ethical approval?

You should start to consider ethical issues at the earliest possible stage in planning your research. A proper consideration of ethical principles is relevant to, and will almost certainly influence, fundamental aspects of the research design from research methods to sampling. The ethics committee will want to be assured that you have thought about all aspects of your research and addressed potential risks and ethical issues.

You must also allow sufficient time for necessary consultation as part of the ethical review process. It is likely that changes will be needed to your application, which will then need resubmitting. Finally, some projects will need other permissions or approvals, which can also take time to obtain.

Students must note that a submission to the ethics committee does not equate to approval – STEP may require resubmission and, in some cases, may reject an application due to considerable ethical concerns. If this happens to your application, you will be advised on the rationale for the decision and your supervisor will help you to identify an alternative topic or methodology.

Students are advised to liaise with their supervisor at the earliest possible time. This is to ensure that projects are viable, are not high risk and will be assessed as either low risk (green category), and middle risk (yellow category). For the purposes of this code, green research is broadly outlined as that which entails research that does not involve human or animal participants and uses secondary resources that exist in the public domain. Yellow research involves unpublished data and/or involves human or animal participants.

To help students and their supervisors understand the parameters of low and medium risk research, our documentation includes reference to a red (high) risk category. Research that falls into the red (high risk) category is not permitted at UCP. We use this category to help student researchers understand where the limits of permitted (green, yellow, and blue) research lie, and to provide a coherent rationale as to why certain types of research cannot be permitted at our institution. Overlaying the green and yellow risk categories, which relate to ethics, is another colour code. The blue category exists to describe projects that may require approval from our Data Protection Officer. The STEP application form and associated resources provide further definition of green, yellow and blue research.

Research that requires external ethics approval is unsuitable for student research due to the time needed to secure external approval, the level of risk involved, and/or the time needed to

establish protocols to manage those risks. **STEP does not accept applications for projects that require additional external approvals**. This does not prohibit students from gaining gatekeeper agreement. Students are allowed, for example, to interview staff in a school where they work with the approval of the gatekeeper (such as the Headteacher).

Under the Academic Regulations, extensions and claims for extenuating circumstances can only be granted to students under certain conditions. Failure to secure ethics approval cannot be used as a reason to seek an adjusted assessment deadline unless there has been a material error on the part of STEP or UCP. Where such an error occurs, the student should seek advice from support@ucp.ac.uk and follow the standard procedures.

The ethics approval process takes time and can require resubmission of documents; this should be expected and anticipated within research plans. We recommend that you make your application as soon as possible to ensure there is sufficient time to make the required amendments.

1.4 Topics not permitted for student research

This code of practice outlines research which the ethics committee can authorise. It also outlines research that the ethics committee cannot approve for research because it is either considered too high risk, involves approval from external parties or because UCP does not hold the relevant licences to authorise such research. UCP cannot permit high risk research. High risk research includes that which:

- Requires travel outside of the UK
- Involves scarce, vulnerable or protected species, habitats or sites
- Involves experimentation on captive or free-living animals, or manipulation of their environment, food or water that has potential to cause physical or psychological harm.
- Involves removal of living or non-living biological or waste material directly from a live animal
- Involves genetic modification of human tissue, or use of genetically modified organisms
- Collects, uses or stores any human tissue or DNA (including but not limited to, serum, plasma, organs, saliva, urine, hair and nails)
- Involves medical research with humans, including clinical trials or medical devices
- Involves the administration of drugs, placebos or other substances (e.g. food, vitamins) to humans
- Causes (or has the potential to cause) pain, physical or psychological harm or negative consequences to humans
- Involves the collection of data without the consent of participants, or other forms of deception
- Relates to military sites, personnel, equipment, or the defence industry
- Risks damage/disturbance to culturally, spiritually or historically significant artefacts/places, or human remains
- Contains research methodologies you, or members of your team, require training to carry out
- Involves access to, or use (including internet use) of, material covered by the

Counter Terrorism and Security Act (2015), or the Terrorism Act (2006), or which could be classified as security sensitive

- Risk being construed as encouraging terrorism or inviting support for proscribed organisations and/or contain extremist views that risk drawing people into terrorism or are shared by extremist groups
- Involves activities which may be illegal and/or the observation, handling or storage (including export) of information or material which may be regarded as illegal
- Involves the NHS (require Health Research Authority and/or NHS REC and NHS R&D Office cost and capacity checks)
- Requires ethical approval from any recognised external agencies (Social Care, Ministry of Justice, Ministry of Defence)
- Involves individuals who lack 'capacity to consent' and therefore fall under the Mental Capacity Act (2005)

1.5 Pilot studies

If a researcher intends to carry out a pilot study, they must obtain ethical approval for it first. Any research to follow up the pilot study will also require ethical approval if you have made changes to your study as a result of the pilot.

Should your research use a questionnaire of your own devising, it is strongly recommended that you pilot it first. Ethical approval will be required for the pilot study and any significant changes to the questionnaire following it will also need ethical approval. Please make it easy for the ethics committee to identify revisions (for example by using track changes or highlighting or colouring changes).

1.6 Collaborative research

If you are engaged in collaborative research where another HEI is the lead organisation, UCP may accept their ethical approval as equivalent to our own. You need to send STEP a copy of the ethics application and approval notification from the lead HEI and wait for permission to proceed. This should be accompanied by documentation for a UCP ethics application, as outlined in Section 2 of this Code.

Where UCP is the lead HEI, you need to obtain ethical approval from the UCP ethics committee. You need to check that other collaborators have obtained ethical approval from their own institution if required, and also that they have checked their insurance arrangements. Alternatively, ethical approval may be conditional on ethical approval being obtained from the collaborating HEIs and confirmation of insurance details. In your application for research ethics approval you must list the collaborating researchers and their HEIs.

1.7 Reuse of previous research data

You may be able to reuse data obtained from previous research. You will need to check that ethical approval was obtained and that participants gave appropriate permission for the data to be reused in the way that you intend. There may also be copyright and/or intellectual property issues to consider. If you wish to reuse data you are advised to seek guidance from your supervisors and/or the ethics committee at the earliest opportunity.

1.8 Conflicts of interest

If there are any conflicts of interest, these must be declared in the ethics application. This includes a conflict of interest arising from the funding for the research.

1.9 Compliance with ethics procedures

Failure to comply with our ethics procedures may be considered misconduct. Where misconduct is suspected the standard UCP policies and practices related to misconduct will be followed. An investigation may be undertaken to determine the severity of the misconduct and the penalty that should be prescribed.

Policies and practices related to misconduct can be accessed here https://ucp.ac.uk/supporting-you/ucp-policies.

How to Apply for University Centre Peterborough Ethical Approval

2.1 All applications

The exact nature of the ethics application process will vary depending on the particular nature of the research project, however, the following provides a generic account of what will be required in most circumstances. Students should:

- Read the Research Ethics Policy and Code of Practice.
- Complete the ethics training including the ethics quiz. You must take a screenshot of your successful ethics quiz completion (70% or greater) and submit this as part of your application.
- Agree an appropriate project focus/aim and methodology with your supervisor.
- Complete a first draft of your application form.
- Share the first draft of your application with your dissertation supervisor.
- It may require many amendments and draft applications before your supervisor is confident that your project is ready for submission to the ethics committee.
- Once your supervisor believes your submission is ethical and is willing to take responsibility for supervising your project in its current form, your supervisor will submit your application to the ethics committee via the ethics Canvas page.

By submitting your application to the ethics Canvas page your supervisor is making the declaration that they are willing to take responsibility for your project as it is written in its current form. You should thus be aware that your supervisor will not submit your application until they are confident that you have completed all the required paperwork, considered all ethical issues, and mitigated any ethical risks.

- Ethics decision. When your application is submitted to the ethics committee, two members of the ethics committee, and either the Chair or Vice Chair, will review your application. A decision about your application will then be communicated to you via Canvas. The decision will be either:
    - Approval
    - Chair's actions (significantly minor amendments that can be reviewed and approved by the Chair or Vice Chair and thus does not require additional review by the committee)

- Conditions (minor amendments)
- Revisions (more significant amendments)
- **Deferral (the ethics committee need to seek additional specialist input before making a decision)**
- Rejection (the application will need to be reconsidered and a new application made)

Students should not start their research before gaining formal approval from the ethics committee. If there is any uncertainty about if approval has been granted please contact the ethics committee at ethics@ucp.ac.uk

In passing an application to the ethics committee, supervisors are confirming that they have scrutinised the documentation and are willing to take responsibility for supervising the project. Supervisors should NOT submit applications that are incomplete or unclear. Supervisors are required to sign the ethics application form to state they are confident that the project being submitted meets the required ethical standards and that they are taking responsibility for supervising the project in its current form.

Dates will be published at the start of the academic year where the ethics committee will convene to formally review applications. Submission to the Formal STEP Review Canvas Assignment must occur a minimum of 8 days prior to the STEP meeting date for it to be reviewed in this meeting. This 8 day deadline is in place to ensure that reviewers have sufficient time to consider the applications prior to the meeting date. Applications that do not meet the deadline will need to be submitted to a future date window, Only supervisors may submit applications to the ethics committee. Students are not permitted to upload documents themselves for review. If a supervisor is not sufficiently confident that the project meets all ethical principles and is not willing to take responsibility for it in its current form they should return the project to the student for amendment.

Students must provide supervisors with their draft applications a minimum of 14 days prior to a meeting date that they wish their applications to be reviewed in, if this application is to be considered in that meeting. This deadline is in place to allow the supervisor sufficient time to review the application before submitting it to the ethics committee. Where a supervisor is not provided with 14 days to review the application the student may need to wait for the next available meeting for their application to be reviewed.

All research projects require ethical approval.

All applicants, in all risk categories, including block approval, are required to declare, or confirm, in the STEP application form that:

a. they have completed the online training package (which is available at https://canvas.ucp.ac.uk/courses/886) (see section 4 below);
b. they have consulted the UCP *Research Ethics Policy*, and this Code of Practice;
c. they have read the list of research topics that are not permitted and UCP, and confirm that their research does not involve any of these.
d. they have completed a Risk Assessment (Health and Safety) if applicable. Please read Policy P425 (available via https://canvas.ucp.ac.uk/courses/886) and complete the associated form.
e. their research complies with the UK General Data Protection Requirement and Data Protection Act (2018) (see sections 3.11, 5.2(e) and 6.1 and 6.2 below)
f. they have completed a Project Risk Assessment if their research is funded externally and was acquired via UCP (see section 3.11 below) or the project requires access to

physical resources or facilities.

g. they have completed a recognised Safeguarding course, if applicable (see Section 4.3)
h. that if the research project involves a contract between University Centre Peterborough and an external party, they have had the contract approved by UCP.
i. they will comply with specified requirements around access to and storage of physical or electronic data (see section 3.11 below).

Please make sure that you have proofread your application and any accompanying documents before submitting them.

Student research projects are grouped into 4 risk categories.

- Green applications are considered low risk.
- Yellow applications are considered medium risk.
- Blue applications are considered medium risk but have additional ethical issues to consider (such as gathering special category data and/or more than 99 participants) and thus need to undertake additional precautions to protect participants.
- Red applications are considered high risk. Students are not permitted to undertake high risk research.

For further information on each risk category's requirements, please see below.

2.2 Green ethical risk category

Green projects are categorised as low risk because, for example, they do not involve human or animal participants.

Projects categorised as Green will be required, at minimum, to:

- Complete the Stage 1 Ethics Application form.
- Complete the ethics training package
- Complete the ethics quiz and achieve a pass mark of 70% or higher.
- Provide the application to the supervisor who, when they believe the project is ethical and are willing to take responsibility for supervising the project, will pass the application to the ethics committee for review.
- You will be notified by the ethics committee if your application has been approved or requires amendments.

Where the project is deemed by the Chair or Vice Chair as a green application the Chair or Vice Chair can approve the project by chair's actions without the project going to the ethics committee.

Please also note that you may need other permissions and approvals, not related to ethics approval, before you can commence your research. These are discussed further below - see Section 3.

Once the ethics committee has given approval the student may start their research.

2.3 Yellow ethical risk category

Yellow projects are considered medium risk because they involve human participants.

Projects categorised as Yellow will be required, at minimum, to:

- Complete the Stage 1 Ethics Application form.
- Complete the ethics training package
- Complete the ethics quiz and achieve a pass mark of 70% or higher.
- Complete a Participant Information Sheet (PIS) and Consent Form that are suitable for distribution to participants.
- Provide the application to the supervisor who, when they believe the project is ethical and are willing to take responsibility for supervising the project, will pass the application to the ethics committee for review.
- You will be notified by the ethics committee if your application has been approved or requires amendments.

You may also need to submit:

- The research tool (e.g. interview schedule or survey questions if applicable to your research)
- Gatekeeper letter (if applicable to your research) (see section 5.3)
- Confirmation of passing a Safeguarding course (if applicable to your research)
- Risk assessment (if bringing people into a new environment, travelling or introducing equipment to a setting, for instance – see section 3.8). UCP's risk assessment form is included within Policy P425 (available via https://canvas.ucp.ac.uk/courses/886)
- Further Data Protection Questions if you intend to collect special category data and/or involve 100 or more participants.

2.4 Blue ethical risk category

Blue projects are considered medium risk because they involve human participants but also require additional considerations because of one or more of the following:

- The research intends to collect data from identified/named participants (projects that anonymise data are not identifying/naming participants and thus do not fall under this category).
- The research intends collecting sufficient data from anonymous participants so that they might become identifiable.
- Intend to collect special category data* from participants
- The research intends to collect data from 100 or more participants
- The research intends to collect special category data (such as sexuality, ethnicity, political opinions, religious or philosophical beliefs, trade union membership; and the processing of genetic data or biometric data for the purpose of uniquely identifying a person; data concerning health or data concerning sex life or sexual orientation).

Projects that are categorised as blue are required to submit a Privacy Notice and Data Protection Impact Assessment in order to seek ethics approval. This is to ensure GDPR compliance. It is important that you use the Stage 1 form to justify your reasons for collecting data, especially if it is special category data*.

Students who intend to collect special category data are encouraged to think about using an online questionnaire in order to afford anonymity to their participants.

Projects categorised as Blue will be required, at minimum, to:

- Complete the Stage 1 Ethics Application form.
- Complete the ethics training package
- Complete the ethics quiz and achieve a pass mark of 70% or higher.
- Complete a Participant Information Sheet (PIS) and Consent Form that are suitable for distribution to participants.
- Complete the Privacy Notice and Data Protection Impact Assessment
- Provide the application to the supervisor who, when they believe the project is ethical and are willing to take responsibility for supervising the project, will pass the application to the ethics committee for review.
- You will be notified by the ethics committee if your application has been approved or requires amendments.

You may also need to submit:

- The research tool (e.g. interview schedule or survey questions if applicable to your research)
- Gatekeeper letter (if applicable to your research)
- Confirmation of passing a Safeguarding course (if applicable to your research)
- Risk assessment (if bringing people into a new environment, travelling or introducing equipment to a setting, for instance – see section 3.9). UCP's risk assessment form is included within Policy P425 (available via https://canvas.ucp.ac.uk/courses/886)
- Further Data Protection Questions if you intend to collect special category data and/or involve 100 or more participants.

2.5 Red ethical risk category

Red risk projects cannot be conducted by UCP students due to the higher risks that may be involved, the time needed to put protocols into place to minimise those risks or seek external approvals, and/or because UCP does not hold the required licences. A full list of projects that would fall into the red risk category is provided in section 1.4, and also on the STEP application form. When responding to questions on the STEP ethics application form, you will need to confirm that you are not undertaking any of the red risk activities.

Students are encouraged to discuss their ideas in detail with their Supervisor, as they will help you to identify a suitable topic, methodology and method. In some cases it may be that a student can continue to study a topic of interest via a different research approach.

2.6 Block Ethical Approval

In some circumstances subjects may have a block ethical approval in place. Block ethical approval is a predefined project design that provides specific parameters within which a student's project must adhere to. For example, students following a block ethical approval process may be limited to using questionnaires within their research.

Where a student is applying for ethical approval within a block ethical approval framework they will be required to follow the normal ethical application process.

When a student applies for ethical approval within a block ethical approval framework their application will be reviewed by the ethics committee Chair or Vice Chair. If the Chair/Vice Chair believe that the project adheres to the parameters of the block ethical approval and have no concerns with the project, the project can be approved by Chair's Actions and thus not require additional scrutiny or review within an ethics committee meeting. Where the Chair or Vice Chair has concerns, the project will be reviewed according to the standard review process.

For a subject to attain block ethical approval the course leader must apply to the ethics committee. Block approval needs to be approved by the ethics committee. If approved by the ethics committee, the application will be passed to RSAC for review. Block approval cannot be used unless ratified by RSAC.

As part of gaining a block approval, course leaders will be required to submit a pro-forma that will stipulate the parameters of research projects that students can undertake. Individual students would then then complete their own ethics application form that adheres to these parameters. Students who do not wish to undertake the pre-defined project may apply for their own approval following the standard ethical application process.

Only course leaders with sufficient experience will be eligible to apply for block approval. The ethics committee reserves the right to refuse any block ethical approval application. The ethics committee also reserves the right to withdraw block ethical approval at any point.

2.7 Documents required to support your research ethics application

Depending on the ethical risk category into which your research falls, you may be required to submit additional documents, as outlined above, in support of your application.

Please ensure that you have submitted all the relevant documents, as without these your application cannot be considered, and you will be unable to start your research.

Where you are required to provide documents that you will use as part of your research, those that you submit must be the ones you will use. If you subsequently make any changes to your research you must submit an amended application (see Section 2.9 below).

2.8 Participant Information Sheet (PIS) and Consent Form (CF)

A Participant Information Sheet (PIS) is essential to inform participants about your research study. It should briefly explain what your research is about and intended to achieve, what you are asking participants to do if they choose to participate and how you will use the data that participants provide. For example, if you are intending to record interviews, or use quotations in your report that will allow individuals to be identified, you must mention this, and you must describe how you will store, and destroy, the data you collect.

You must also make it clear if there are any potential benefits or risks to participating, and state that your research has ethical approval from University Centre Peterborough. Participants have the right to withdraw at any time without providing an explanation, and the PIS should inform them of this, and that participants are not obliged to participate fully
- for example they may refuse to answer a question if they do not wish to do so. Participants must also be informed about their legal rights.

You must provide contact details to allow participants to request any further information; this should normally be your UCP email address. You should not give a personal email address or landline telephone number, but mobile numbers are acceptable if there is no alternative.

The PIS should include guidance on how participants can make a complaint should they wish to do so. Participants should be provided with the email address of the supervisor and the email address of the ethics committee. Should a participant wish to raise a complaint, please encourage them to speak to you or your supervisor in the first instance. However, if they still have concerns regarding your study, you should invite them to escalate directly to UCP. You should provide details of where to find the University Centre Peterborough complaints procedure with your PIS to allow them to do this easily:

- P903 Complaints Procedure for UCP Visitors, Customers and Other Stakeholders Available at: https://ucp.ac.uk/supporting-you/ucp-policies

- Ethics committee email address: ethics@ucp.ac.uk

The Consent Form is used to confirm the participant's agreement to participate in your study. Please note however that gaining consent must be viewed as a process, not just the participant reading a Participant Information Sheet and signing a Consent Form. If there is any doubt that a participant can give fully informed, voluntary consent you must not proceed with them as participants in the research. Although you would normally obtain written consent, in some contexts this may not be appropriate or possible. In such circumstances it is acceptable to take consent in another way (e.g. you may do this verbally if recording interviews) but you need to explain on your application why you are doing this. Issues around consent are discussed further below (please see Section 5.3).

There are templates for the Participant Information Sheet and Consent Form on the ethics Canvas site (which is available at https://canvas.ucp.ac.uk/courses/886). Students are advised to follow these. The standard formats for the Participant Information Sheet and Consent Form are not, however appropriate in all instances.

In preparing both documents, you should use only clear and accessible language and only the most necessary technical terms. Try to avoid abbreviations. If necessary, you may need to adapt your Participant Information Sheet to address the needs of different participants, for example people who may require the information in alternative formats, or where cultural differences may have an influence.

You are advised to show your PIS and Consent Form to someone outside of your field to see if they are able to understand them; you may also find it useful to carry out a readability analysis, for example using the Flesch Reading Ease Readability Formula, at:

http://www.readabilityformulas.com/flesch-reading-ease-readability-formula.php

Your participants should be given a copy of your PIS and Consent Form to keep. Where you are using an online questionnaire as a research tool the PIS and Consent Form will be embedded within the questionnaire. The questionnaire should overtly indicate to their participants that by completing the questionnaire they are giving their consent to that which is outlined within the PIS.

2.9 Complaints

Complains by student and stakeholder (including visitors and members of the public) related to any aspect of the research process can be made by following the standard UCP complaints procedures outlined here https://www.ucp.ac.uk/discover/commitments-and-standards/published-documents/#:~:text=Complaints%20procedure%20for%20students,are%20in%20the%20policy%20below.

Researchers should make their participants aware of how to access the complaints policies and who participants can contact.

A summary of the complains process is provided below:

Early Resolution
The first step in making a complaint is to seek early resolution.

- In the first instance complaints or expressions of concern related to the research at University Centre Peterborough can be made to the ethics committee via the following email address ethics@ucp.ac.uk or, where appropriate, the research supervisor, or course leader.

Stage 1 – Making a formal complaint
If early resolution was not possible or satisfactory please follow the steps outlined by the policy for stakeholder complaints or student complaints.

Stage 2 – Requesting an internal review
If the outcome of a formal complaint is not satisfactory an internal review can be requested. For details on an internal review please see the UCP policy.

Full details on the policy and procedures can be found here https://www.ucp.ac.uk/discover/commitments-and-standards/published-documents/#:~:text=Complaints%20procedure%20for%20students,are%20in%20the%20policy%20below.

2.10 Ethics committee structure and decision-making outcomes

STEP has a cross-faculty remit, encompassing all courses at UCP except for those where a pre-agreed exemption exists.

At institutional level, the RSAC deals with policy and procedure. RSAC is a sub-committee of the Student Engagement, Learning and Teaching committee, which is itself a Standing Committee of the HE Academic Board and Inspire Education Group.

Terms of reference for the above are available to Supervisors (for sharing with students) via the UCP ethics canvas page.

STEP decisions are subject to audit by UCP's RSAC. Possible decisions of the ethics committee are normally:

- approve outright
- offer approval subject to certain conditions (minor conditions may then be checked by the supervisor rather than requiring resubmission to STEP)

- request specific revisions, which may be approved by Chair's Action or the full committee
- Deferral (where the committee needs to seek additional expert guidance they may defer making a decision until this expert guidance has been sought).
- request a full resubmission, in cases in which the application requires extensive rewriting)
- reject

The ethics committee may also make other general conditions which will be listed on your approval letter, with which the researcher must comply.

Supervisors who are members of the ethics committee must not take a part in the consideration of their own supervisees' application.

2.11 Extensions to your ethical approval period

All ethical approvals are valid for a specific period of time (normally one academic year for undergraduate and taught postgraduate students). Retrospective ethical approval is not possible.

Please ensure that if you need an extension you apply for this in sufficient time and before your approval expires. This includes students who apply for mitigation or intermit from their studies. If you are not intending to make any changes to your study you do not need to submit a new application. Please instead email the ethics committee to request an extension. You cannot proceed with your study after the original approval has expired until you have confirmation from the ethics committee that an extension has been granted. An extension to your research can be given for a further academic year; please apply to the ethics committee again if you will need further time after this.

2.12 Amendments to your approved study

If you wish to make any amendments to your study, you must apply for re-approval. Students who wish to seek re-approval should follow the normal procedure for seeking ethical approval outlined above.

If you intend to seek re-approval please ensure that it is clear how you have revised your research. You may wish to do this in a separate commentary. You should also indicate any previous re-approvals. You must wait for approval before you implement your changes and continue with your research.

The expiry date of your approval will not be changed unless you request an extension as well as an amendment to your study.

If you are changing from green to yellow research, or from yellow to green research because the risks inherent in your research strategy have changed, you MUST formally withdraw your original application by emailing ethics@ucp.ac.uk and submit a new application via the standard procedure.

The ethics committee provides approval for one academic year. If a student has a break in studies and continues their research into the following academic year they must contact the ethics committee to have an extension agreed. If there are no changes to the original research design an extension may be granted without the need to reapply. If the research project is being changed in any way the new proposal must be submitted to the ethics committee according to the normal process outlined above.

If there is any uncertainty students should contact their supervisor or course leader in the first instance. The ethics committee may also be contacted at ethics@ucp.ac.uk.

2.13 Adverse events and 'near misses'

There are two procedures that students and/or their supervisor must adhere to following any accident or 'near miss' that occurs during their research. The incident and any adverse effects (which may have already occurred or may occur in the future) must be reported to the ethics committee, via ethics@ucp.ac.uk, within two working days. The incident must also be reported to the Health and Safety team via the procedures outlined within Policy 416.

2.14 Monitoring

Your research project may be subject to monitoring. To enable you to meet the requirements for this, please keep copies of all the documentation relating to the study and evidence of the original ethical approval and any subsequent approval for amendments.

Other permissions, approvals and requirements to consider

You may also need to consider other requirements, including obtaining other approvals or permissions before commencing your research, regardless of the ethical risk category your research falls into. It is the student's responsibility to obtain and consider these, under the guidance of their supervisor. In some cases, as outlined above, the ethics committee may request confirmation that specific permissions or approvals have been obtained, or requirements considered, but you should not rely on this.

If your research falls under legislation, the the ethics committee will want to see that you are familiar with the legislation and evidence that you will adhere to it. It is the responsibility of each student and their supervisor to become familiar with the legislation that relates to, and impacts on, their research. This includes any new legislation which is enacted after the ethics committee has given ethics approval. If new legislation means that you must make changes to your research, you must notify the ethics committee and apply for new approval based on the amendments you need to make.

The following list of other permissions, approvals and requirements to consider should not be considered to be exhaustive.

3.1 Disclosure and Barring Service (DBS) check

UCP does not permit research to be undertaken with individuals who are classified as vulnerable. Individuals classified as vulnerable include, but are not exclusive to, individuals under the age of 18 and individuals with a diminished capacity to provide informed consent.

UCP does not permit research students to enter a children's educational setting (for example a nursery, primary, or secondary school) for the purpose of undertaking research.

In some circumstances students may be employed within a setting where there are vulnerable individuals, undertake a placement where there are vulnerable individuals, or volunteer within a setting where there are vulnerable individuals. For example, UCP students may be employed as a counsellor, or may volunteer as a teacher. Education related degree students are likely to be working with children in educational settings while undertaking their studies. Similarly, counselling students are likely to be working with vulnerable individuals. It is common practice for educational and counselling professionals to amend their practice based on continual reflection, training, reading, and responses to evidence. Students on such programmes are thus likely to amend their practice inline with their responsibilities as a professional, volunteer, or trainee. Students, may, for example, choose to reflect on their experiences, interview educational professions, or survey parents. However, students should not directly involve vulnerable individuals (e.g children) as research participants. For example, researchers should not set up a laboratory experiment to test an intervention with children in different conditions.

Students will not be required to submit a DBS as part of their research applications as students are not permitted to use students as participants or enter children's educational settings for the purpose of undertaking their research projects.

Students who work with vulnerable individuals as part of their course will be required to complete a DBS, however, the policies, requirements and processes involved with this are not overseen by STEP as students will not be directly involving children as research participants and thus no additional DBS will be required beyond what is already in place.

Where students are required to complete, or supply evidence of a valid DBS as part of their studies, this will be administered by the appropriate UCP staff (for example, the Admissions Office).

If there is reason for STEP to seek confirmation of a valid DBS certificate they will contact the Admissions Office who will not share specific details of your DBS check with the ethics committee, but will provide a short statement confirming that a DBS check does/does not

contain information that is of concern to the ethics committee.

Students who are working with people aged 16 or under as part of pre-existing professional placement, volunteer work, or employment as a condition of their study, or at the same time as their study must also evidence that they have passed a valid industry recognised safeguarding course (such as Keeping Children Safe in Education).

Where students who are working with people aged 16 or under as part of pre-existing professional placement, volunteer work, or employment as a condition of their study, or at the same time as their study and choose to base their research within this setting, for example, by interviewing teachers at the institution, they must obtain informed consent from an appropriate gatekeeper (for example a head teacher) which will need to be reviewed by the ethics committee prior to authorising the research.

3.2 NHS and Social Care approvals

UCP does not allow students to undertake research that requires approval from an external committee, including that given by the NHS. This is due to the timelines involved in securing such approvals, and the protocols that must be implemented in order to secure approval. Additionally, UCP cannot act as a sponsor [1] for NHS and Social Care approvals.

3.3 Security-sensitive research

Research relating to terrorism, or any other research that could be classified as security-sensitive is not permitted at UCP. This includes, for instance Ministry of Defence-commissioned work on military equipment, and IT encryption design for public bodies or businesses.

Students should be aware that visits to websites related to terrorism and the downloading of material issued by terrorist groups (even from open access sites) may be subject to monitoring by the police and may prompt an investigation. UCP cannot provide sufficient resource to allow safe access to such material within a undergraduate project timescale.

The Counter Terrorism and Security Act (2015) and Terrorism Act (2006) outlaw web posting of material that encourages or endorses terrorism, including terrorist acts carried out in the past. Sections of the Act create a risk of prosecution for people who transmit material of this nature, including electronically.

3.4 Ministry of Defence Research Ethics Committee (MODREC)

UCP does not allow students to undertake research that requires approval from an external committee, including that given by MODREC. This is due to the timelines involved in securing such approvals, and the protocols that must be implemented in order to secure approval. Additionally, UCP cannot act as a sponsor for MODREC approvals.

3.5 Approvals for research in the criminal justice system

UCP does not allow students to undertake research that requires approval from an external committee, including that given by NOMS and IRAS. This is due to the timelines involved in securing such approvals, and the protocols that must be implemented in order to

secure approval. In the case of research with MOJ/HMPPS, these organisations state that they cannot support students who do not have business support from a senior member of staff at their headquarters; such support is unlikely to be given to undergraduate students.

[1] As defined by the UK Policy Framework for Health and Social Care Research 2021 - https://www.hra.nhs.uk/planning-and-improving-research/policies-standards-legislation/uk-policy-framework-health-social-care-research/uk-policy-framework-health-and-social-care-research/#:~:text=2.1%20The%20UK%20policy%20framework%20for%20health%20and,take%20account%20of%20legal%20requirements%20and%20other%20standards.)

3.6 Research taking place outside the UK

For insurance reasons, UCP does not permit students to travel abroad in order to conduct primary research. This includes primary research in a student's home environment if they are an international student, and visiting archives or other sites of interest for other than tourism purposes. It also includes filming and photography. Students should not attempt to circumvent this by recruiting a third party to undertake their research.

Students must also bear in mind that the Data Protection Act (2018) states that data must not be transferred to a country or territory outside the European Economic Area, unless the country has adequate levels of protection for personal data. Students should therefore take reasonable actions to ensure that the participants of online surveys are in the UK or EEA at the time they complete the survey.

For advice and guidance visit the Information Commissioner's Office website: https://ico.org.uk/for-organisations/guide-to-data-protection/principle-8-international/

You will be required to declare, in Section 4 of the STEP application form, that your research complies with the UK General Data Protection Requirement and Data Protection Act (2018).

3.7 Research involving animals and significant habitats

For the purposes of this Code, the term animals includes both live vertebrates and invertebrates and both free living and captive or domestic animals. University Centre Peterborough does not hold licences under the Animals (Scientific Procedures) Act (1986) and therefore anything that constitutes a procedure under that Act is not permitted. Research at UCP should not negatively impact on animals or significant habitats although field research (such as geological surveying) and observations of animals (in both natural and man-made settings) is possible where the risks are low. STEP has a biological safety officer who can assist in determining the level of risk involved, and may also contact Peterborough City Council's Lead Archaeologist if additional expert guidance is required.

3.8 Insurance

Generally speaking, University Centre Peterborough's insurance covers freehold buildings, staff and students, within Inspire Education Group companies including wholly owned subsidiaries. In most cases, once you have obtained ethical approval, you will be covered by University Centre Peterborough's insurance provided you remain within the UK.

3.9 Risk Assessment (Health and Safety)

You are required to declare, as part of Section 4 of the STEP application form, whether or not you have completed a Risk Assessment (Health & Safety). This mostly addresses the risks to researchers themselves of undertaking the research (for example, physical threat or abuse, psychological trauma or accident) but can also include risk to the research itself (for example, because of the potential to be caught in a compromising situation or being accused of improper behaviour) or causing physical or psychological harm to others.

If there are any significant potential risks (such as lone working, using a hired venue or manoeuvring equipment) that could arise from your research, you **and** your supervisor must complete the Risk Assessment (Health and Safety).

The ethics committee will ask to see the Risk Assessment as part of the ethics review process. As part of the STEP application form you will be required to explain any potential risks you have identified to yourself or your co-researchers and the steps you will take to mitigate them.

Once a Risk Assessment has been completed, a list of procedures should be developed to address the risks identified. Please refer to Policy P425, which includes a risk assessment pro-forma (available via https://canvas.ucp.ac.uk/courses/886).

3.10 Risk Assessment (Project)

A risk assessment for the project, (e.g. whether it will be completed in the time-frame) must be completed for all externally funded research if the funding was gained via University Centre Peterborough. If this applies, you are required to declare, as part of Section 4 of the STEP application form, that you have completed a Project Risk Assessment. Your supervisor will provide you with a standard pro-forma for this.

3.11 Access to, and storage of, research data

It is essential to store, and allow access to your research data, appropriately, and you will be required, in Section 4 of the STEP application form, to confirm that you will comply with the data storage expectations outlined below.

Regardless of the nature of your research data, you should make sure you keep up to date copies, so that should something happen to your working copies, your research is not adversely affected.

Particular care is needed regarding any protected information (as defined by the General Data Protection Requirement and Data Protection Act (2018); see section 6.1 below), including any personal, sensitive or confidential information. Whether held electronically or physically, storage must be secure and accessible only to you, the research team, and other authorised individuals.

Cloud services such as Dropbox often do not offer sufficient quality or security, and as a general rule should not be used. Such services are often based outside the UK and/or EU, in jurisdictions whose data protection laws are insufficiently robust. Very often, the terms and conditions of such commercial cloud-based services allow the provider to harvest your data. **If use of a cloud service is unavoidable, you must use your UCP Google Drive or Microsoft OneDrive. You must not store protected data on cloud services under any circumstances.**

Whenever using portable data storage, (e.g. laptops, tablets, USB sticks, removable or portable hard drives, CDs and DVDs, etc) to hold protected, personal, confidential or sensitive data, these should be securely stored when on premises, and password protected or securely encrypted when taken off site. Devices such as mobile phones and tablets should be used in 'aeroplane mode' until data has been transferred, in order to avoid accidental upload to the Cloud.

The preferred storage solution for electronic files is on a University server accessed from a password-protected computer, or via a remote desktop accessed via an approved connection such as VPN. Students wishing to store data elsewhere (e.g. their employer's servers) should justify this within their ethics application.

You should also note that, increasingly, research funders and publishers are expecting data generated from research and supporting publications to be made openly available, where it is appropriate to do so.

3.12 Equipment checks

Electrical or other safety checks must be carried out on any equipment prior to it being used, if it has not already undergone appropriate checks by UCP. If you are at another institution, please check their requirements. Equipment must also be maintained and have regular checks throughout the course of your research, as required. Researchers must be trained in the use of any equipment and updates provided, as required. You need to check that any device you use does not fall under the Medical Devices Regulations (2002) (see section 6.5).

3.13 Permission from external organisations in which you are carrying out research

If you are carrying out research in other organisations, you must obtain permission in writing from a person in authority at the organisation, for example a head teacher at a school or company director. This must include permission for your use and ownership of data and your right to publish findings. If you plan to use the name of the organisation in the dissemination of your research, you must also have permission for this. If there is any possibility of the organisation being identified, even if their name or other key information is not used, this must be acknowledged. This is to try and avoid potential problems later on, for example organisations later refusing permission for the data to be used.

There is a template letter on the research ethics website (https://canvas.ucp.ac.uk/courses/886) which you may find useful.

Please note that even when you have obtained written permission, you may also need to seek verbal permission from managers at less senior levels, for example to facilitate access to the organisation, and you still need consent from participants.

3.14 Permission from archives in which you are carrying out research

If you are using data from private archives, you must have a written agreement with the owner/controller of the material regarding copyright, rights of publication, and the uses you intend to make of the material and the nature of any anonymising strategies you intend to use. Even for public archives, there may be issues regarding ownership, publication and confidentiality that require explicit agreement. If the data relates to people who are dead, you

must consider the feelings of any living relatives and whether permission is required from them. If researching documents online that are in the public domain, you need to consider whether you still need to obtain written permission from the organisations holding them. Students are not permitted to travel abroad to visit archives as researchers, but may make online requests for material.

3.15 Internet-based research

If using the internet to carry out your research, you must read the terms and conditions of internet sites carefully beforehand, to ascertain ownership of the data, whether you are permitted to use it and whether there are any conditions regarding using it.

3.16 Professional Codes of Practice and/or Conduct, and funding body requirements

You must ensure that you comply with any professional codes of practice and/or conduct that apply to your field of research. You are advised to discuss this with your supervisor.

If your research has been funded, you must ensure that your research complies with any ethical requirements of your grant funder. Increasingly also grant funders have other requirements relating, for example, to open access publication of research outputs and underpinning data. Requirements relating to data must be addressed in your ethics approval application.

3.17 Intellectual property

UCP engages the services of Eversheds Sutherland for legal guidance. If any intellectual property could arise from your research, you must ensure that this is addressed at the earliest point. For further guidance, please see: https://www.gov.uk/intellectual-property-an-overview. Students may also consult with the Chair of RSAC
– katie.mcallister@ieg.ac.uk

Ethics Training Requirements

4.1 Research ethics training for students and their supervisors

All students who are required to submit an application for research ethics approval (see section 1.1 above) must complete the Online Introduction to Research and Professional Ethics course. The course is available at: https://canvas.ucp.ac.uk/courses/886

At the end of the course you must take the quiz, achieve at least 70% and take a screen shot of the confirmation message of passing. Students must submit this confirmation with their ethics application, in addition to declaring that they have completed the relevant training in research ethics; supervisors must send this confirmation to their STEP Administrator to record. Some courses have an exemption from this requirement; please check with your supervisor.

Supervisors, including those exempt from submitting an application of research ethics (see section 1.1 above) are also required to complete this course every two years.

4.2 Research ethics training for ethics committee members

The ethics committee and RSAC members are required to complete the online training at least once every two years. At the end of the course they must take the quiz, achieve at least 70% and take a screenshot of the confirmation message of passing. In addition, ethics committee members must engage in CPD activity every two years thereafter.

As part of its quality assurance processes, UCP and validating bodies require the ethics committee to provide an annual report. This will include, but is not limited to, a summary of ethics decisions made, any incidence of misconduct, and activities towards supporting and training staff and students.

4.3 Safeguarding training

UCP does not permit research with individuals who are vulnerable. For example, UCP does not permit children to be recruited as research participants. However, students are permitted to carry out research that may be related to children within a setting. For example, researchers working within a school may wish to reflect on their own practice, or interview other teachers. Such research can only be conducted within a child's educational setting if:

1. they are enrolled on a course that required scrutiny of a DBS check by the Admissions Office prior to acceptance onto Level 6

2. they have a long-standing placement (voluntary or paid) which involves working with them in a professional context and

3. they have undertaken an industry-recognised safeguarding course as part of their placement and have evidence of this.

All applications related to children within a setting will be carefully scrutinised to ensure

that there are no ethical issues.

Key issues to consider in your ethics approval application

5.1 Selection of participants

The ethics committee will need to be assured that you have given careful consideration to the selection of your participants. For example, you will need to justify your sampling technique or inclusion and exclusion criteria for participants.

If you will be carrying out research in an organisation, you need to give due consideration to how you will access potential participants. You will not be able to obtain details of individuals held by another organisation without the prior permission from those individuals, unless their names are already in the public domain. In such cases, the initial approach to participants may need to come from someone working at that organisation. Even if you work at the organisation involved and already have access to details of individuals, this does not automatically mean that you are allowed to contact them for research purposes. You must check with a senior manager.

If your research is internet-based, how can you be sure that participants are who they claim to be? For example, can you be sure that they are all aged 18 years and over, or located in a specific place, given world-wide access to the internet. If appropriate for your research, you may consider gaining permission from an organisation regarding advertising for participants on their website.

You should try to avoid involving potential participants who are unsuitable. For example, if you are using a poster to recruit participants, it makes sense to clearly identify any exclusion criteria on it. Try not to ask people to complete a questionnaire to establish whether they meet the inclusion criteria. Find another way to screen these people out to avoid wasting their time.

5.2 Informing your participants

You must ensure that you include all relevant information about your research and explain clearly what participants will be asked to do on the Participant Information Sheet. Participants should be told why they have been selected to take part and how many people have been approached.

a) Checking understanding

You must ensure that people understand what they are being asked to do. You could do this by asking them questions about what is on the Participant Information Sheet to establish that they understand it.

b) Research using anonymous questionnaires

When your study involves a questionnaire which participants will return anonymously, you must still provide participants with relevant information about your study, although you may choose to incorporate it into the questionnaire rather than using a separate Participant Information Sheet.

Researchers are asked to use UCP's licenced software, JISC's online surveys platform located at www.onlinesurveys.ac.uk. Because this is a UK-based survey tool, it is fully compliant with UK data protection laws and accessibility requirements, unlike other commonly used online survey software tools. Once you have been granted ethical approval for your project the ethics committee will create a JISC online survey account for you to use. You will receive an email from JISC which will allow you to access the software. You must login using your UCP credentials, not a personal email address. If you attempt to login using a personal email address it will not recognise you as a UCP student and will ask you to pay for the service. For reference this is the URL for the JISC online survey https://www.onlinesurveys.ac.uk/help-support/online-surveys-security/

Your supervisor will arrange for you to gain access to onlinesurveys.ac.uk under UCP's licence so that you do not need to pay for your own licence. You can practise using the system and set up your questionnaire in advance of gaining ethics approval, but you MUST NOT make your questionnaire 'live' without full approval from the ethics committee. This includes pilot questionnaires.

c) Inclusivity

Please ensure that your documentation is inclusive. Spell out any acronyms the first time you use them in your application. Avoid the use of jargon. It may be useful to show your Participant Information Sheet to a friend or a colleague who is not in your field, to check that it is easily understood.

If your research sample is likely to include people who cannot speak or write English, the documentation needs to be translated and this may require consideration of cultural norms. Researchers must be of at least level 2 competency in the native language of their participants. See http://www2.warwick.ac.uk/fac/arts/languagecentre/lifelonglearning/levels. If you are not of at least level 2 competency, you must employ a professional translator and ensure that all documents are translated.

You also need to consider people with special needs (for example, visual impairments, dyslexia) and the provision of documentation in alternative formats.

d) Anonymity

All data you collect should be anonymised if possible. However, information that could identify people is not limited to their names, and it is sometimes possible with case studies or interview transcripts that people may be identified, by their peers if not by the general public, even if every effort is made to remove all identifying information relating to participants prior to dissemination. If this is the case for your study, it needs to be made explicit in the Participant Information Sheet that there is a possibility that participants could be identified in dissemination. Guard against making unrealistic assurances to participants about data being anonymous.

If you will be making use of personally identifiable information in dissemination, for example photographs, special care must be taken. When you are doing research using the internet, even more care must be taken, for example search engines could be used to find the source of quotes.

If you will be using direct quotes from participants in your dissemination, or recording using audio or visual equipment, this must be stated on both the Participant Information Sheet and as

one of the statements on the Consent Form.

The words ‘anonymous’ (not identified by name) and ‘confidential’ (secret or private), are often confused. Ensure that you refer to these correctly on the Participant Information Sheet. If you declare to a participant that you will keep their data confidential you cannot publish the findings in your dissertation.

e) Access to, storage of and destruction of data

All participants must be informed at the outset what personal data (or sensitive personal data) will be required from them and what this data will be used for. They will also need to know how long the data will be kept for, who will have access to it (for example, the research team) and how it will be stored, including whether it will be anonymised for storage. You must make these arrangements clear on the Participant Information Sheet.

All arrangements must comply with the General Data Protection Requirement and Data Protection Act (2018). Please see Section 3.10 above, and Section 6.1 and 6.2 below, for further information.

f) Participants’ attendance

If the research involves participants having to travel to where the study will be carried out, this must be made explicit on the Participant Information Sheet, including how many visits will be required, how frequent they will be and whether travelling expenses will be reimbursed. It may not be possible to reimburse travel expenses, in which case this must be stated on the Participant Information Sheet.

g) Sharing results with participants

It is good practice to offer to send participants a summary of your general research findings. This should be factored in at the planning stages of your research.

5.3 Consent

This is an important area and one that the ethics committee will focus on when reviewing your application. Participants must have the capacity to consent, and that consent must be informed and freely given. There must be no coercion. Participants should also be given adequate time to decide whether they wish to take part and have the opportunity to discuss the research with family and friends first, should they wish.

a) Capacity to consent

Your participants must have the capacity to give informed consent to participate in your research.

If one or more adult participants is unable to consent, the research falls under the Mental Capacity Act (2005) and can only be legally approved by NHS REC or National Social Care Research Committees. UCP does not permit students to conduct research that falls under the Mental Capacity Act because of this.

b) Participants in organisations

For research taking place in an organisation, you must consider whether participants may have been told they should take part in the study by management. The requirement for voluntary consent without coercion can be aided by providing an information pack to the organisation, with clear recruitment procedures, that make it clear that people should not take part if they do not wish to and that they can withdraw at any time.

c) Withdrawal from the study

Participants have the right to withdraw from the study at any time, without providing any explanation. You need to make it as easy as possible for people to withdraw, bearing in mind that they might not feel comfortable telling you directly that they no longer want to participate. At the start of the study, you could provide participants with a form to email or post you saying they would like to withdraw. Participants may also give you cues that they would like to withdraw, for example not turning up for interviews or giving short answers and it is important to be sensitive to these.

You also need to consider whether the data participants have provided would still be useful if they decide to withdraw before the end of the study. If this is the case, they will still need to consent to its use. You can therefore give participants the option to withdraw and also have their data withdrawn, or to withdraw but state that they are still happy for their data to be used. Participants may also choose to withdraw their data from the study. It is good practice to notify all participants of the last date it will be possible for them to withdraw their data (for example, prior to writing up your dissertation or for publication).

If you are carrying out a focus group, it will not be possible to withdraw one person's data without removing the data for all participants, because what one person says will affect the responses from others. You must therefore make it clear on the Participant Information Sheet that it will not be possible to withdraw data in this case.

d) Asking participants for information about other people

If you are carrying out research that involves asking participants about other people, you must consider whether you need to also obtain consent from them. Even if participants are disclosing information about family members, you must not assume that this is ethically acceptable.

e) Research using questionnaires

If you are asking people to complete a questionnaire which will be anonymous, consent can be implied by its return. You do not need to also ask participants to complete a Consent Form. It is, however, good practice to include general statements taken from the template Consent Form in your questionnaire, and ask participants to check a box for each one to confirm that they are happy to participate.

f) Internet-based research

Although what people say online, for example in chat-rooms on internet sites is technically in the public domain, this does not mean that it would be ethical to use it for research as people

may not expect their comments to be used in this way. It may, however, not be possible to obtain consent from such people and, if this is the case, you need to justify the approach that you have used, in particular relating to the anonymity of participants.

g) Forms of consent

Obtaining written consent should be your default position. In some cases, this may not be possible or not appropriate, perhaps because of the participants or their cultural norms. Verbal consent, if it is sought, should be audio-recorded or witnessed. You need to justify to the ethics committee why you are not planning on obtaining written consent.

h) Studies where it is not possible to obtain consent

Obtaining consent from participants must be your default position. For some types of research e.g. covert observation, it will not be possible to obtain consent, but your approach must be justified and any potential harm to participants arising from the study is carefully considered.

Your study may involve existing data sets that will have been gathered without consent from the participants for your study. Often these data sets are so large and anonymous that this poses low ethical concerns. It is, however, of more concern in circumstances such as:

- Data to which you have access solely by virtue of a non-research role e.g. through employment. This might be clinical data if you work in such a setting, or commercial data in business research.

- Data accessed through the internet e.g. analysis of social network sites, even if identities are not recorded with the data.

- Intensive data gathering and data linkage and aggregation from data sets, including those publicly available, may allow individuals to be identified by those with access to the collated data.

- Novel use of existing data that might have given participants reasons to object if they had known about it when they provided consent.

In these cases you will need to think carefully about whether you need to adjust your procedures or how you can justify them ethically.

5.4 Disclosure

One issue that arises fairly frequently in research is whether information that is revealed during the course of the study should be disclosed, either to the participants themselves or to third parties. The ethics committee will want to be certain that the researcher has weighed up the various factors involved and that their approach to disclosure is justified. This will serve to reduce the risks to the researcher, as problems are less likely to occur later on.

Students must always notify their supervisors should issues of disclosure arise and all researchers must notify the ethics committee. Even when all factors have been addressed in detail beforehand, situations may arise when it is not clear whether disclosed information should be passed on. Such cases should be discussed by the research team/students and supervisors and referred to the ethics committee immediately.

When working with a group of participants where disclosure is more likely to occur, there should generally be a clause on the Participant Information Sheet stating that if certain details are revealed, they will need to be passed onto third parties.

The decision whether to disclose needs to be considered on a case-by-case basis for each research project. Researchers also need to ensure that they are complying with any professional codes of practice or any policies within the organisation in which they are working.

A need to disclose may arise in a variety of situations, as discussed below.

a) Participants expressing the intent to harm themselves or others

The measure that has been used to obtain the information is important. If the results of a questionnaire have suggested, for example, intent to self-harm, how robust is this measure clinically? The researcher may be seen to have a duty of care or professional responsibility to pass this information on to a third party (for example, the person's doctor/GP), but the point at

which this should occur may not always be clear. As well as providing details in the Participant Information Sheet, researchers should discuss their intentions to pass information on to third parties with participants.

b) When illegal activities by participants are revealed

The issue of disclosure becomes even more complex in the area of illegal activities. When a researcher is working with certain groups of participants, for example people who take illegal drugs, this issue will arise. Clearly, a great deal of valuable research takes place within these areas, but the legal and ethical issues must be carefully addressed beforehand.

In general, there is no legal obligation to report an offence (except in certain terrorism and money laundering cases), but careful consideration of the Serious Crime Act (2007) should be undertaken by the researcher. This Act deals with offences such as assisting or encouraging an offender, which may impose a duty to act in order to avoid liability. Legal advice may need to be sought.

c) If unethical practice is revealed by staff working at organisations where the research is being undertaken.

In the instance of an employee revealing unethical or bad practice, this should generally be disclosed, but there are also a number of factors that need to be considered. Is the researcher also employed at the organisation? Is the bad practice likely to be dangerous, for example, if the research is taking place in a medical setting, or illegal (e.g. fraud)? Who should the information be disclosed to? Are there any negative consequences that may arise for the researcher if he/she does this, for example, if he/she works at the organisation?

Legislation relating to research ethics

It is essential that you are aware of all legislation relating to your research. If there is any conflict between legislation and your conditions of ethics approval, please refer to the ethics committee Chair immediately via the following email ethics@ucp.ac.uk. Some of the key legislation follows; please note that this is not an exhaustive list.

6.1 The Data Protection Act (2018)

Research taking place in the UK must comply with the Data Protection Act (2018). When handling any personal data (or sensitive personal data – see below), you must be familiar with this Act and adhere to all its requirements. The Data Protection Act (2018) is available at:

https://www.gov.uk/data-protection

Everyone responsible for using personal data has to follow strict rules called 'data protection principles'. They must make sure the information is:

- used fairly, lawfully and transparently
- used for specified, explicit purposes
- used in a way that is adequate, relevant and limited to only what is necessary
- accurate and, where necessary, kept up to date
- kept for no longer than is necessary
- handled in a way that ensures appropriate security, including protection against unlawful or unauthorised processing, access, loss, destruction or damage

There is stronger legal protection for more sensitive information, such as:

- race
- ethnic background
- political opinions
- religious beliefs
- trade union membership
- genetics
- biometrics (where used for identification)
- health
- sex life or orientation

Greater care must be taken in storing this data and deciding who has access to it. Please see our General Data Protection Policy at https://https://ucp.ac.uk/supporting-you/ucp-policies/

You will be required to declare, in Section 4 of the STEP application form, that your research complies with the DPA and General Data Protection Requirement (see below).

If you have any queries relating to any data protection issues you may contact the ethics committee who will refer your questions to the Data Protection Officer.

6.2 The General Data Protection Requirement (GDPR)

The GDPR and Data Protection Act (2018) introduced stricter requirements for organisations to inform people about how their data is used, by more emphasis on transparency, accountability and data protection by default and design.

The GDPR applies to 'personal data' and 'special category data'. The changes in transparency requirements have applied to all personal data processed since 25 May 2018, not just to personal data obtained after that date. This includes personal data that is simply held or stored, without being otherwise actively used.

The principles of the GDPR remain unchanged since Brexit and the implementation of the UK GDPR over the EU GDPR:

- The collection of personal data must be lawful, fair and transparent
- Personal data is processed for specified explicit and legitimate purposes
- Only the minimum necessary personal data is processed
- Personal data must be accurate and up to date
- Personal data cannot be stored any longer than necessary
- The personal data must be kept safe and secure

However, in some instances, participants' rights to access, change or move their information with regards to research projects may be limited, as their information may need to be managed in specific ways in order for the research to be reliable and accurate. Participants must be made aware of these restrictions.

Personal data

You need to be aware of the definition of personal data under the new legislation:

Personal data means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who 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.

Please note that there is a wider definition of personal data under the new legislation, including technical data such as location data and online identifiers (e.g. IP addresses).

Special category data

You also need to be aware of what is classified as special category data.

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

Legal basis for processing data

Organisations must have a valid, legal reason to process personal data. This is called a 'legal basis'. Although this requirement is not new, organisations must now record and also notify participants about what their legal basis will be. In most cases, as University Centre Peterborough is a publicly-funded institution, the legal basis for processing personal data for research purposes will be 'task in the public interest'. GDPR has stopped public bodies from using consent as their legal basis for processing data for research. This does not, however, remove the ethical importance of obtaining consent from participants.

Additional justification to 'task in the public interest' needs to be provided to processing special category data as follows:

Article 9(2)(j) for special category personal data:

Processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) based on Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject.

This refers to Article (89) which outline safeguards that are likely to be present in most research already.

- Robust governance controls exist, for personal data and gives assurance;
- Support legitimate research projects that are in the public interest;
- The personal data processed is necessary for research purposes; and
- Individual interests are safeguarded.

Researchers must ensure that they comply with these established university governance procedures in order to legitimise the use of special category personal data for research purposes.

Principles relating to the processing of personal data

If you can carry out your research without collecting personally identifiable data, you should do this. Once an individual's personal data has been robustly anonymised, such that the individual is no longer identifiable, then the data is no longer classed as personal data meaning it does not fall under data protection legislation. You must, however, be confident that the data is truly anonymised, as although participants may not be identifiable from each piece of information you have collected about them by itself, they could be potentially identifiable by putting different pieces of information that you hold about them together (please see the Motivated Intruder Test

(e.g. https://www.ucl.ac.uk/data-protection/guidance-staff-students-and-researchers/practical-data-protection-guidance-notices/anonymisation-and).

Please also note that the act of anonymisation consists of processing of personal data.

If you do need to collect personal data you must collect the minimum amount you require (known as data minimization) and should ideally anonymise or if not possible, pseudoanonymise, at the earliest opportunity. Pseudonymising requires the physical separation of 'real-world' identifiers from the rest of the research data. A link is maintained between research data and 'real world' identifiers via a cipher or code

The members of the research team who have access to the 'real world' identifiers must be limited as far as possible, which helps to guard against accidental disclosure.

If working with pseudonymised data is not possible or would render the purposes of the research invalid, then research projects will work with the *minimal amount of personal data* as is strictly necessary in order that the research purpose will be achievable.

How will I convey the appropriate information to potential research participants?

One of the ways to ensure transparency in personal data processing is in compliance with the GDPR principle is to draw up a Privacy Notice. This must contain the following:

- University Centre Peterborough is the data controller
- The purpose for the processing
- The legal justification for the processing
- Identify the personal data for processing
- The sources and disclosures of the personal data
- IEG Data Protection Officer and local contact details
- The rights of the individual
- The security provided for the processing of the data
- Link to IEG's Corporate Privacy Notice
- Contact details of the Information Commissioner

A template Privacy Notice is available via the research ethics Canvas website. Students should work with their supervisors on this to tailor it to their research and submit it with their research ethics application. The Participant Information Sheet and Consent Form guidance, also available online, have been updated to meet GDPR requirements.

UCP's privacy statement is available at: https://www.ucp.ac.uk/privacy-and-cookies/

You must submit your Privacy Notice and participant information sheet and consent form to STEP for review.

Data Impact Assessment.

If research involves processing special category data or a high volume of data where such processing impacts the fundamental privacy rights of individuals, the ethics committee may require a Data Impact Assessment to ensure that data will be collated and processed in

compliance with legislation.

Data Incidents

The Data Protection Officer must be informed of any personal data incidents immediately. The University Centre is required to notify the Information Commissioner's Office of personal data breaches within 72 hours and so there must be no delay. The GDPR has introduced significant fines for personal data breaches. The procedures for reporting a data breach, which includes completion of the Data Breach Report Form is detailed within Policy GDPR01 available via https://canvas.ucp.ac.uk/courses/886. The form is contained within Annex B. Please also notify the Chair of STEP of any breach.

UCP's data protection officer is contactable via dpo@ieg.ac.uk or 01780 484300.

Further Information

The Information Commissioner's website:

https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/

6.4 The Mental Capacity Act (2005)

If your participant/s do not have capacity to consent, you MUST NOT involve them in your research.

There are a range of factors that can cause incapacity, including learning disabilities, dementia and mental health problems. Loss of capacity can also be temporary, for example due to shock or the effects of drugs or alcohol. Capacity is measured using a two-stage test:

- Is there an impairment or disturbance in the functioning of the person's mind or brain?
- If yes, is this sufficient to cause the person to be unable to make that particular decision at the relevant time?

The ability of a person to make a decision should be assessed in each different situation. It is important to acknowledge that people may have the capacity to make some decisions, but not others, or their ability to do this may fluctuate over time.

The relevant legislation in England and Wales is the Mental Capacity Act (2005). In Scotland the relevant legislation is Section 51 of the Adults with Incapacity (Scotland) Act (2000). Northern Ireland also has a Mental Capacity Act.

6.5 The Medical Devices Regulations (2002) as amended and Medicines for Human Use (Clinical Trials) Regulations (2004) as amended

UCP does not permit research for medicinal purpose. Medicinal purpose means:

- treating or preventing disease or diagnosing disease or ascertaining the existence degree of or extent of a physiological condition or
- assisting with or altering in any way the process of conception or
- investigating or participating in methods of contraception or
- inducing anaesthesia or
- otherwise preventing or interfering with the normal operation of a physiological function

The relevant legislation is the Medicines for Human Use (Clinical Trials) Regulations (2004) as amended or Medical Devices Regulations (2002) as amended. For further information see the Medicines and Healthcare products Regulatory (MHRA) website, at www.mhra.gov.uk/index.htm

6.6 The Genetically Modified Organisms (Contained Use) Regulations (2014)

The GMO(CU) Regulations (2014) provide for human health and safety and environmental protection from genetically modified micro-organisms in contained use, and human health and safety from genetically modified plants and animals. The key requirement of the GMO(CU) Regulations is to assess the risks of all contained uses and to ensure the sure that any necessary controls are put in place. UCP does not permit students to undertake research involving GMOs.

6.7 The Terrorism Act (2006)

Sections 2 and 3 of chapter 11 of the Terrorism Act (2006) outlaw the dissemination of terrorist publications, including by electronic means, and give a very wide definition of ‘terrorist publication’ and ‘statements’ that could be construed as endorsing or promoting terrorism. This includes the web posting of material that encourages or endorses terrorist acts, even terrorist acts that have occurred in the past. UCP does not permit students to undertake research into topics that require access to such resources or the use of key words that may incidentally result in access to such resources.

6.8 The Counter-Terrorism and Security Act (2015)

The Counter-Terrorism and Security Act (2015) places a duty on ‘specified authorities’ (of which University Centre Peterborough is one) to prevent people being drawn into terrorism. However, the Act also recognises the necessity for freedom of speech in universities which may involve researchers accessing material that falls under provisions of the Act. Further, accessing such material could attract attention from relevant authorities. UCP therefore does not permit students to conduct research on security-sensitive topics.

Our proactive response the government Prevent Initiative (link below) is detailed within our Safeguarding Children, Young People and Vulnerable Adults policy.

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/445916/Prevent_Duty_Guidance_For_Higher_Education_England_Wales_.pdf

https://www.peterborough.ac.uk/policies-statements/

UCP thanks ARU for their support, and for permitting the use and adaptation of their documentation and resources.