Greater Brighton Metropolitan College

PROCEDURE FOR THE ETHICAL REVIEW OF RESEARCH PROPOSALS

(Based on the University of Brighton Centre for Learning and Teaching Ethical Guidelines)

Policy review area	Curriculum
Lead manager	Assistant Principal, Curriculum
Approval level	SLT
Start date	26 September 2017
Review cycle	3 years
Next review	26 September 2020

1. All researchers have a duty to society, to their profession, to the University of Brighton, to Greater Brighton Metropolitan College, and to those funding their research, to conduct their research in the most conscientious and responsible manner possible. Staff members in leadership or supervisory positions have an obligation to foster personal integrity in the conduct of staff and students under their direction. They are also responsible for the ethical basis of the research and its funding, and for the safety of all involved in the research process. Research supervisors are ultimately held responsible for research quality.

2. Greater Brighton Metropolitan College has adopted a modified version of the University of Brighton's three tier system of ethics and governance review for all staff and student research proposals, including undergraduate dissertations and post-graduate projects which involve human participants.

3. At Tier 1, all student research involving human participants should be reviewed and signed off by two members of staff, including the course or module leader or their nominee.

4. All staff research should be reviewed by a member of staff with Curriculum Management responsibility for HE, a member of staff with oversight of Research and Scholarly Activity or the Director of HE. It will either be signed off (Tier 1) or referred to Tier 2 review.

5. At Tier 1, the system of ethics and governance review is designed to ensure that the proposed research is of high quality, feasible and the resources are in place for it to be carried out effectively. This level of review includes scrutiny of ethical issues and an assessment of risk. Course leaders will offer guidance to students on the format of the ethical elements in a research proposal.

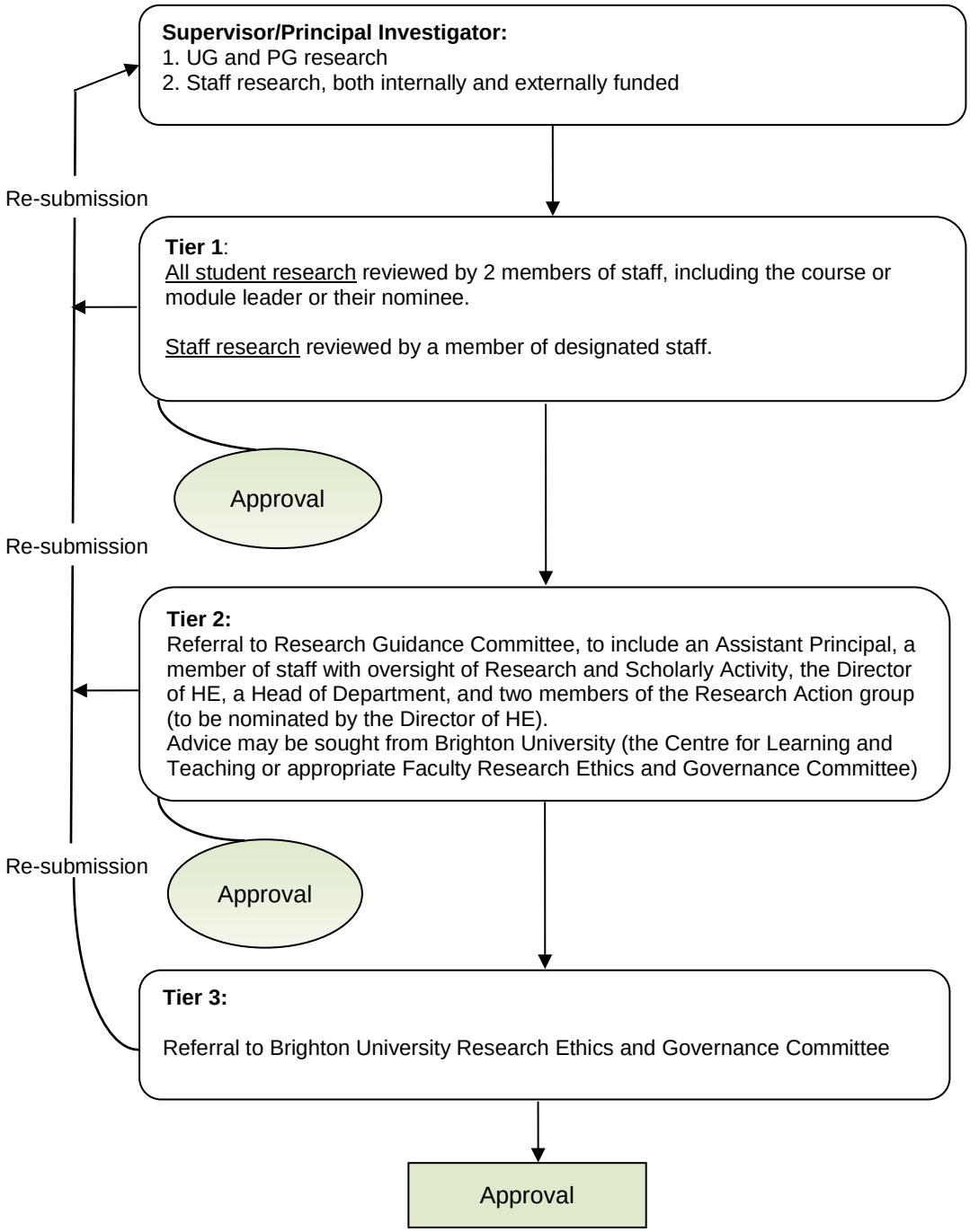
6. Tier 2 relates to the review of proposals where it is decided that the research proposed falls outside of that which is considered 'routine' (see table on pages 5 and 6).

7. At Tier 2, the proposal will be scrutinised by a group consisting of an Assistant Principal, a member of staff with oversight of Research and Scholarly Activity, the Director of HE, a Head of Department, and two members of the Research Action group (to be nominated by the Director of HE). At this stage, advice from the appropriate University of Brighton Faculty Research Ethics and Governance Committee and/or colleagues at the Centre for Learning and Teaching may be sought.

8. Tier 3 relates to University level scrutiny (Research Ethics Guidance Committee).

9. For externally funded research, there is no need for ethical review to take place before bids are submitted. However, should the bid be successful, an Ethics Protocol form must be submitted to the Director of HE for scrutiny.

Approval Process Flow Diagram



10. Research participants will usually be:

    - Higher Education students
    - People who are potential students
    - Lecturers
    - Other staff members of educational institutions and various educational practitioners
    - Employers, parents and others with an interest in education.

11. Common research settings will include:

    - Universities
    - Colleges
    - Schools
    - Workplaces
    - Community organisations
    - Various locations associated with education, for example field and outdoor learning centres, museums and art galleries.

12. Research enquiries are design within a range of methodologies, and the research methods commonly used are:

    - Overt observation
    - Individual and group interviews
    - Focus groups
    - Questionnaires
    - Dataset, document and artefact analysis
    - Various methods of 'visual research'.

13. Where enquiries use quantitative data, these are most often derived from questionnaires, or institutional records of various procedures relating to, for example, admissions, assessment and evaluation. In the latter case, access to these data is generally regulated by law and institutional protocol.

14. All researchers are encouraged to give careful, reflexive consideration to the position of the researcher in relation to the participants in the research, especially when these are students, peers, colleagues, managers and institutional partners.

15. Please refer to the Ethics Protocol Guidance Form (Appendix 1) when reviewing a student proposal or completing a project application. Successful bidders will be asked to complete an Ethics Protocol Form (Appendix 2) for scrutiny. Successful proposals from staff seeking external funding must be reviewed by the Director of HE (or nominee) and an Ethics Protocol Form completed.

16. Educational researchers must be able to distinguish between routine and non-routine groups of participants, settings and methods, in order to make decisions about the ethical implications of the proposed research design and conduct.

17. Covert research or deception should only be used in cases where transparency is impossible, for example if it would invalidate the research or present a risk to the participants or researchers. In some cases it may be possible to inform participants after they have taken part and hold a debriefing with them.

18. If the proposed research exceeds the scope of the usual participants, contexts and methods described below (Table 1), the Tier 1 reviewers should consider referring it to review at Tier 2. If it involves more than minimum risk, it must be referred to Tier 2 review.

19. Limits of 'routine' educational research

Table 1 suggests the limits of routine research activity (participants, settings and methods) within educational research, and the ethical implications of moving beyond these boundaries.

Table 1

Boundaries of routine educational research activity	***Moving beyond the boundaries with ethical implications which will require further scrutiny***
Participants need to be able give informed consent to research enquiries which focus on routine aspects of higher education. Informed consent may involve the consent of parents, guardians and those with senior roles in institutions, such as Registrars or Pro-Vice Chancellors; Deans or Heads of Department; Principals of colleges; managers of workplaces and other 'external settings'; Head teachers. ***Particular consideration should be given to power relations in education research***.	*Enquiries which:* • move beyond the focus of consent such as questions about home and family life, or experiences beyond the setting; • focus on topics of intensely personal or emotional nature, such as bereavement; • focus on marginal activities such as homelessness, or mis-use of alcohol, drugs or other substances; • have the potential to cause detriment to participants; • place the participants in an unequal power relationship.
Research settings need to be clearly related to the focus of the educational research. If working with children, young people and vulnerable adults, researchers will need to be DBS checked and/or accompanied by other adults. Permissions to conduct research in the educational settings must be granted by people in senior roles.	*Enquiries which:* • take place outside routine settings without clear safeguards for respect and safety of participants and researchers, such as cafes and social spaces; • take place in participants' or researchers' homes; • require covert observation or questioning within a setting.
Boundaries of routine educational research activity	***Moving beyond the boundaries with ethical implications which will require further scrutiny***
Research methods need to collect, store and analyse data in ways which are clear to participants; and ensure privacy, security, confidentiality and negotiated anonymity for participants. *Careful consideration should also be given to opportunities for participant feedback and validation.*	*Enquiries which include:* • methods which need specific permissions for data collection and use, such as photography, video, personal artefacts; • methods which may evoke personal or emotional responses, such as life history interviews, or observation of practice;

	• methods which involve covert enquiry.

20. The Decision-making Process

20.1. Student research proposals involving human participants will be reviewed by two academic tutors, advisors or supervisors, at least one of whom is appropriately qualified.

20.2. Following the success of a staff research proposal, the Ethics Protocol Form will be reviewed by an Assistant Principal, a member of staff with oversight of Research and Scholarly Activity, the Director of HE, a Head of Department, or a member of the Research Action group (to be nominated by the Director of HE).

20.3. If the reviewers decide that the Ethics Protocol Form requires further work, it will be returned to the author(s) for re-writing and subsequent resubmission.

20.4. If the proposal meets ethical criteria, the reviewers will approve it. If there are any doubts or concerns, the reviewers are advised to discuss the proposal further with colleagues and consider referring the proposal to Tier 2.

20.5. If the proposal does not meet the criteria or raises areas of concern, the reviewers will refer the proposal for consideration at Tier 2.

21. All research proposals should be reviewed at Tier 1 level to ensure that:

21.1 The research is of high quality, is necessary, worthwhile, methodologically sound, feasible and does not duplicate existing work unnecessarily (it is recognised that not all research at undergraduate level will be completely original, but it may still be considered worthwhile because of its educational value, and that Master's level research may also be more valuable for the student's learning than for the actual results).

21.2. The researchers have the appropriate level of experience and expertise required to carry out the research.

21.3. The arrangements and resources needed to conduct the research are in place, and that public funds and resources are being used appropriately.

21.4. The quality of the environment in which the research is to take place is appropriate.

21.5. The research conforms to the guidelines and policies of the University and any relevant funding bodies or professional associations.

21.6. Additionally, all research proposals involving human participants, or access to people's data or property, should be scrutinised to ensure that ethical issues have been identified and addressed appropriately. In particular:

21.6.1 Participants will be fully informed both verbally and via an information sheet regarding the purpose of the study and how it will be carried out, including full details of what their involvement will entail.

21.6.2 It is clear to participants that their participation is voluntary, and they may withdraw from the study at any time without giving a reason.

21.6.3 Where possible, participants will give their consent to taking part by signing the consent form (Appendix 3).

21.6.4 Appropriate arrangements are in place for the collection, handling and storage of data, and issues of confidentiality, anonymity and privacy have been considered.

21.6.5 Any questionnaires, interview questions or recruitment posters, leaflets or letters to be used in the study are or will be clearly written in language suitable for the target audience and worded in a way which is unlikely to cause offence or distress to participants.

21.6.6 Where the research is likely to involve participants who might not adequately understand verbal or written information given in English, arrangements will be made for translation of recruitment materials and information sheets, and provision of interpreters for verbal communication.

21.7 The checklist below should also be used to determine whether there is likely to be more than minimal risk or potential ethical concerns. If any risk is identified, the reviewer should refer the proposal for Tier 2 review.

22. Risk Assessment Checklist

Research which would normally be considered to involve more than minimum risk would include:

22.1 Causing participants physical damage, harm or more than minimal pain.

22.2 Manual handling of participants or other items of a heavy or hazardous nature.

22.3 Vigorous physical exercise or physical activity from which there is a chance of accidents occurring.

22.4 Intrusive physiological or psychological interventions or procedures. These might include the administration of drugs or other substances; taking samples (e.g. blood, saliva or urine) from participants; use of probes or other equipment to measure or monitor bodily performance; techniques such as hypnotherapy. All research involving human tissue must either be covered by a Human Tissue Authority licence, or reviewed by an NHS LREC.

22.5 Exposure of participants (including the researchers) to dangerous situations or environments, or to radioactive or unusually toxic or hazardous materials.

22.6 Work being carried out outside the UK where there may be issues of local practice and political sensitivities.

22.7 Causing psychological or emotional stress, anxiety or humiliation.

22.8 Addressing sensitive topics, such as beliefs, painful reflections or traumas, experience of violence or abuse, illness, sexual behaviour, illegal or political behaviour, or people's gender or ethnic status.

22.9 Deception or conduct of research without participants' full and informed consent.

22.10 The possibility of breaching confidentiality or disclosing information beyond the initial consent given (for example to avoid future harm to participants or others in cases where criminal activity, violence or abuse is revealed during the research).

22.11 People who are vulnerable, for example due to age, social inequality, psychological or medical condition, or who lack mental capacity (research involving those who lack capacity must be approved by an 'appropriate body' under the Mental Capacity Act 2005 – normally an NHS LREC).

22.12 Groups where permission of a gatekeeper is normally required for access to its members.

22.13 Participatory research where members of the public are involved in research data collection.

22.14 Access to or use of secure data; records of personal or confidential information; visual images or recordings where individuals may be identifiable; documents, web sites or other materials of a sensitive political, moral, medical or religious nature.

22.15 Likelihood of significant negative impact on the physical or social environment.

Appendix 1

Ethics Protocol Guidance Form

Ethics are an essential part of "maintaining the honesty, integrity and legitimacy of research practice" (May, 1997: 42). There are number of different ethical issues that need to be considered when conducting a research project. This consideration should take place throughout the whole research process (from planning, through to data collection and analysis, writing up and dissemination of research results).

This guidance has been adapted from the Learning and Teaching Department of the University of the Creative Arts to assist you in drawing up an ethics protocol for your research project. For the vast majority of research projects, this will be straight-forward and non-problematic. For others, there may be particular ethical issues that might arise in your research which require deliberation and perhaps resolution or compromise. In such cases, you will be advised accordingly *(see Ethics Approval Form at Appendix 2).*

Please keep a copy of this form and protocol for your own records.

ETHICS REVIEW CHECKLIST

HOW WILL YOU:
1. Fully inform participants about the nature of the research? *All research participants need to have a full understanding of the research purpose (including what their participation involves, how their data will be used, how and where you will report on the research findings and who you will report the research findings to). Consent should be obtained at every stage of data collection. Please use the Greater Brighton Metropolitan College Student Consent Form (Appendix 3) which is available on the HE VLE under Scholarly Activity – Guidelines.*
2. Ensure that participants take part freely and voluntarily? *Participation in a research project must be entirely voluntary. Researchers should avoid putting any pressure on participants to participate against their free will (including ensuring that gatekeepers do not exert any undue pressure on potential participants). Incentives to participate should be kept within reasonable limits. For example, you should ensure that any financial inducements that you offer to participants are reasonable (e.g. compensation for time).*
3. Gain the additional consent required for any vulnerable participants? *Informed consent must be obtained from all those participating in the research study and where this involves children/young people under the age of 16 or vulnerable groups such as older persons or adults with learning difficulties, it may also be appropriate to gain consent from their guardians (e.g. parents) or 'responsible others' (e.g. carers, teachers, social workers etc.). See the BERA Revised Ethical Guidelines for Educational Research (2004) for more information on researching children, vulnerable young people and vulnerable adults.*
4. Justify deception of participants if this is necessarily involved (e.g. covert observation of people)? *Gaining participant's voluntary consent is considered the normal procedure for the conduct of research. Deception of participants (i.e. research without consent) should be avoided unless the research design specifically requires you to conduct your research in this way. Decisions to use deception must be the subject of full deliberation and approval for this course of action should be obtained from the Greater Brighton Metropolitan College Research Guidance Committee (see Ethics Approval Form at Appendix 2)*
5. Offer protection for any vulnerable participants in your study? *It is the responsibility of the principal researcher to ensure that all research project staff comply with legal requirements in relation to working with children/young people under the age of 18 or vulnerable young people/adults. For example, all staff working with these groups of people must have been subject to a Criminal Records Bureau check (see www.crb.gov.uk for more information).*

6. Inform participants that they have the right to withdraw from the study?

Researchers have a duty to make participants aware of their right to withdraw at any stage of the research for any or no reason and without negative consequences. Whilst you may do this verbally, it is good practice to include this information on the Greater Brighton Metropolitan College Student Consent Form (Appendix 3)

HOW WILL YOU:

7. Ensure that your research does not cause harm or have negative consequences for the participants?

Research should be designed and conducted in a way that minimises harm or risk to individuals and respects the interests of all groups whatever their age, gender, ethnicity, culture, religion, disability or other characteristics. Participant's interests or well-being should not be damaged as a result of their participation in the research. Researchers must cease immediately from any actions in the research process that cause emotional or other harm to their participants.

8. Deal with issues of anonymity and confidentiality in your study?

Researchers should ensure that data collected in their study remains confidential and anonymity of participants is respected, unless participants have specifically waived that right. In such circumstances, the researcher should get a waiver in writing. Researchers must also remember that in some research contexts, participants may expect to be identified with any publication of their original work or other input and, where appropriate, this wish should be respected.

9. Deal with any legal issues which arise from your research study?

If illegal behaviour comes to light during the course of a research investigation, the researcher must carefully consider making a disclosure to the appropriate authorities (particularly if the behaviour is likely to be harmful to the participants or to others). Decisions to override agreements on confidentiality and anonymity must be referred to the Greater Brighton Metropolitan College Research Guidance Committee for deliberation.

10. Comply with the Data Protection Act (1998) in respect to the storage, use and availability of the data you collect?

Researchers must comply with the legal requirements in relation to the storage, use and availability of research data as described in the Data Protection Act (1998). According to BERA (2004) the implications of this are:
(1) Research participants are entitled to know how and where their personal data is being stored, how it is going to be used and who will have access to it.
(2) Participant's permission must be gained in order to disclose their personal information to third parties and researchers must ensure that such parties are permitted to have access to such information in the first place.
(3) Private citizens have the right to access any personal data that is stored in relation to them.
(4) It is the researcher's responsibility to ensure that all data is stored securely and that the form of any dissemination does not directly or indirectly lead to a breach of agreed confidentiality or anonymity.
(5) Unless otherwise agreed, any records, such as audio/video recordings and transcripts must be destroyed following completion of the research (see the Data Protection Act (1998) for more information).

11. Inform the participants of the outcomes of the research?

It is good practice for researchers to debrief participants at the end of the research and to provide them with copies of any reports or publications arising from their participation. In large research projects where this may be impractical, alternative means should be used to ensure participants are informed of the outcomes (e.g. via a website). Dissemination of research findings to participants should be made appropriate to the audience (e.g. non-technical, lay terms).

HOW WILL YOU:

12. Ensure that you fulfil any obligations/responsibilities to your sponsor/s?

Researchers must fulfil their responsibilities to sponsors to the highest possible standards. It is in the researcher's interests that respective responsibilities (and entitlements) should be agreed with the sponsors at the beginning of a research project. BERA (2004) suggests that such agreements should minimally cover the purpose of the research, the research methods to be used, any conditions of access to data or participants, ownership of data, the researcher's right to publish, requirements for reporting and dissemination, deadlines for completion of the work and the accounting for the use of funds. Researchers must avoid agreeing to any sponsor conditions which could lead to the contravention of the good practice detailed in the BERA Ethical Guidelines for Educational Research (2004).

13. Minimise risks to your own health and safety in conducting this research?

Researchers should conduct their research in a way that minimises any risks to their own health and safety. For example, collecting research data alone at a private address or insecure location should be avoided wherever possible and should only be considered if a public space is not convenient or appropriate. If a researcher is collecting data from such a location then suitable precautions should be put in place to ensure their safety (e.g. informing a reliable person where you are, what time you are planning to return and arranging to telephone them when you leave the address, so that if there is any concern about your safety, then they will respond appropriately).

14. Guarantee that any researchers or support staff involved in the project understand and adhere to the ethical guidelines of this project?

It is the responsibility of the principal researcher to ensure that any staff (academic and/or support) involved in the research project are fully informed and adhere to the ethical guidelines of the research project.

15. Protect the reputation of educational research?

All educational researchers must protect the reputation of educational research by ensuring they conduct their research to the highest standard. The ethical principles of integrity, honesty, confidentiality, voluntary participation, and avoidance of harm to participants characterise research that is conducted in a professional and ethical manner.

Bibliography

British Educational Research Association (2004) *Revised Ethical Guidelines for Educational Research*, Southwell: BERA, available from www.bera.ac.uk/files/2008/09/ethica1.pdf [accessed 3 March 2009]

Economic and Social Science Research Council (ESRC) *Research Ethics Framework*, available from http://www.esrc.ac.uk/ESRCInfoCentre/Images/ESRC_Re_Ethics_Frame_tcm6-11291.pdf [accessed 3 March 2009]

May, T. (1997) *Social Research: Issues, Methods and Process*, Second Edition, Buckinghamshire: Open University Press.

Acknowledgements: This guidance quotes verbatim, summarises and paraphrases recommendations made in the 'BERA Revised Ethical Guidelines for Educational Research' and the 'Economic and Social Research Council's Research Ethics Framework'. The design and content of the form is based on best practice examples used in other higher education institutions (for example, University of Bristol and the University of Southampton).

Appendix 2

Ethics Protocol Form

Name of principal researcher/s	
Department	
Campus	
e-mail address	
Telephone number	
Title of research project	

Does your research involve human participants?	
If yes, who are they? Early Years/Pre-school; School-aged children; Young people (aged 17-18); Adults – please describe them	
Which data collection methods are you using (select ALL that apply)	
Interviews	
Focus groups	
Questionnaires	
Action Research	
Observation	
Use of personal records	
Literature review	
Other (please describe):	

Having considered the ethics review checklist (Appendix 1 of the Ethics Policy and Procedure), please detail the specific procedures for how you will handle these issues in the collection and dissemination of data in your research project. If you anticipate any of the issues being problematic in your study, please give a summary of the issue and the action to be taken to address it.

For further advice about research ethics, please contact Jac Cattaneo on 01903 273481 or by email Jacqueline.Cattaneo@gbmc.ac.uk.

Ethics protocol:

Protecting participants

Collection methods

Potential problems

Data analysis

Dissemination of Results

Declaration

I confirm that to the best of my knowledge this is a full description of the ethical issues that may arise in the course of this research project.

Should I significantly change the question, design or conduct of the research over the duration of the project, I understand that I may be required to submit a new ethics protocol form for approval.*

Name: ……
(PLEASE PRINT)

Signed: …… Date: ……

***Please attach the following documents to this form:**

- Your research proposal (this should provide a clear description of your research, including who is doing what, to whom, to how many, where, when and why)
- Information sheets and other materials to be used to inform potential participants about the research, where applicable.

To be completed by the Director of HE

Appropriate action taken to maintain ethical standards – no further action necessary. **This project now has ethical approval**	
The issues require further ethical guidance. **This project does not yet have ethical approval**	

Comments:

Name: ……
(PLEASE PRINT)

Signed: …… Date: ……..

Appendix 3

Greater Brighton Metropolitan College Student Consent Form

I am carrying out project to study ***<insert brief description of your project and/or refer to more detailed information sheet if you have produced one>.*** This may involve documenting some teaching sessions and other activities; selected students and/or staff may also be interviewed about their views and experiences. All recordings and interview material will be stored securely and used only for the purposes of the project; confidential data will be seen only by the project leader(s).

1. If you are willing to be included in recorded activities please write your name clearly and sign and date the form below. There is no obligation to agree to this.
2. Please add your email address or other contact details if you are willing to be interviewed and/or if you wish to be contacted so you can preview any materials before they are used for project reports, online resources, etc, or to be identified as the author of your work if it is included in any published images.
3. If you have any queries about the project, please contact me <***insert name***> at <***insert Greater Brighton Metropolitan email address***>.

I have read the above information and I consent to taking part in this study. I understand that some teaching sessions and other activities in which I participate may be recorded for the purposes of the project. By signing this form I give Greater Brighton Metropolitan College, its agents and employees full copyright and authority to use extracts from this material in any or all media and for educational purposes only without compensation. My consent is freely given and there is no obligation to agree.

Name	Course	Signature	I am willing to be interviewed / I wish to preview draft resources [delete as appropriate] - email me at:	Date