

University of Greenwich Research Ethics Policy

1. Scope and Purpose

1.1 The aim of the University of Greenwich Research Ethics Policy is to encourage a high quality research and enterprise culture, with the highest possible standards of integrity and practice. The policy applies to all academic, contract research and administrative staff, all postgraduate research students, and also undergraduate and masters students who are undertaking research. In short, the policy applies to all disciplines and research activities within the University, or sub-contracted on its behalf.

1.2 All staff and students are expected to act ethically when engaged in University business. Any research involving the following requires ethical consideration:

1.2.1 Human participation, defined as:

- i. Direct involvement through physically invasive procedures, such as the taking of blood samples
- ii. Direct involvement through non-invasive procedures, such as interviews, questionnaires, surveys, observation, laboratory-based experiments
- iii. Indirect involvement through access to personal information and/or tissue
- iv. Involvement requiring consent on behalf of others, such as by parents for a child participant

1.2.1.1 While particular attention must be paid to the interests of potentially vulnerable groups, including children under the age of eighteen, elderly people, physically or mentally ill people, people with learning difficulties, people in care, bereaved people, and people in prison, the University recognises that it has a duty of care towards *all* members of the wider community affected by its activities.

1.2.1.2 The University also recognises that it has a duty of care to its own staff, and that this includes the avoidance of harm to those undertaking research. In general, it may be inappropriate for undergraduates to undertake research projects involving vulnerable participants.

1.2.2 The use of non-human sentient creatures. This shall be restricted to research falling outside the scope of the Animals (Scientific Procedures) Act 1986, for example this could include observational and behavioural studies of animals in a natural setting. This Act regulates the use of protected animals in any experimental or other scientific procedure which may cause pain, suffering, distress or lasting harm to the animal. A protected animal according to the Act is “any living vertebrate other than man and any living cephalopod. Fish and amphibia are protected once they can feed independently”. The Home Office requires a licence for such studies.

1.2.3 Any research proposal involving harmful or criminal, or sensitive or extremist subject matters or research protocols. Extremism is defined, in line with other University policies, as engagement in, or advocacy of, activities which seek through actual or threatened violence, intimidation or harassment to restrict or oppose values of liberal democracy: tolerance, equality, justice, respect for the rule of law, non-violence, inclusiveness, freedom of thought and of expression of thought (whether by oral, visual, written or other means).

1.2.4 Any research proposal where the University's [Ethical Research Collaboration Policy](#) indicates that the proposal should be referred for ethical review because it may conflict with the University's values.

1.3 Allegations that a staff member or a student has failed to act in accordance with this Policy will be investigated under the following University procedures:

- Allegations against staff: [Procedure for Investigating Research Misconduct](#)
- Allegations against postgraduate research students: [Postgraduate Student Research Misconduct Procedure](#)
- Allegations against undergraduate and taught postgraduate students: [Assessment Misconduct Procedure](#)

2. Responsibilities

2.1 The University has established a framework for research ethics governance in which its University Research Ethics Board (UREB), a Committee of Academic Council, has a central approval and provision of advice role.

2.2 Ethical scrutiny of certain categories of research is delegated to Faculty Research Ethics Committees (FRECs), in line with their Terms of Reference:

- undergraduate and taught postgraduate investigations, procedures and research projects carried out in the Faculty or under its auspices, including at partner colleges;
- research projects by postgraduate research degree students.

2.3 Notwithstanding the delegation of such ethical approval applications to Faculty Research Ethics Committees as set out above, the following proposals must always be submitted to the University Research Ethics Committee for approval following review by the relevant FREC:

2.3.1 any research activity by University staff where ethical approval is required under 1.2 above;

2.3.2 any research activity by undergraduate, taught postgraduate and postgraduate research students involving:

- vulnerable people (as set out in 1.2.1.1 above);
- harmful or criminal, or sensitive or extremist subject matters or research protocols (as set out in 1.2.3 above);
- protected animals (as set out in 1.2.2 above);
- physically invasive procedures (as set out in 1.2.1(i) above);

- where there are ethical concerns about the source of funding of the research (as set out in 1.2.4);
- 2.3.3 any research activity by postgraduate research degree students which involves collecting personal data which is 'special category' data in the sense of the General Data Protection Regulation (race, ethnic origins, political opinions, religious beliefs, trade union membership, genetics, biometrics, health, sexual life, sexual orientation), personal data about criminal convictions or offences, or personal financial information.

UREB may, exceptionally, delegate the ethical approval of taught student proposals in 2.3.2 to a Faculty Research Ethics Committee (e.g. where student projects in an area regularly fall into one of these categories). FRECs may, in turn, delegate approval to any sub-committees which they have established (e.g. at School level) provided the FREC retains oversight and ensures that sub-committees are appropriately supported. UREB shall ensure that any delegation is exercised appropriately by considering the minutes of the FREC and its decisions on applications (para. 2.6), including the decisions of any sub-committees of the FREC.

- 2.4 Where approval by UREB is required, postgraduate research degree students (including staff studying for postgraduate research degrees) must receive approval from their Faculty Research Degrees Committee before gaining approval from UREB.
- 2.5 A Faculty Research Ethics Committee may refer a research proposal which falls within its remit to UREB for approval where the FREC considers that it requires UREB's guidance on a proposal which is difficult or contentious.
- 2.6 The minutes of FRECs and decisions on applications considered by FRECs shall be reported to the UREB. Exceptionally, UREB may decide to review an application which has already been considered by an FREC where UREB considers that this is necessary to ensure compliance with the University's research ethics governance framework. UREB's decision in all cases shall be final.
- 2.7 University staff have an obligation to ensure that not only their own research but any undergraduate, postgraduate taught or research degree student research conducted under their supervision is ethically sound and has been approved by the relevant research ethics committee.
- 2.8 Where research projects are subject to external approval, for example by the NHS, the Faculty responsible must ensure that this approval is sought, given, and evidence provided to the University of Greenwich Research Ethics Board. Similarly, where approval for a project has been given by a Research Ethics Committee at another university, as may be the case with a collaborative project, the University of Greenwich Research Ethics Board must be provided with satisfactory evidence of this. UREB may require that further information and clarification is provided for externally approved projects to ensure that appropriate ethical standards have been met.

- 2.9 Research should not commence until the relevant approval has been granted. See the University's [Guidance on Ethical Approval for Research](#) for more guidance.

3. General Principles

- 3.1 The University Research Ethics Policy is based upon widely accepted principles and practices governing research. The key elements are as follows:

3.1.1 Minimal risk of harm to participants and researchers, including emotional and mental distress, and possible damage to financial and social standing, as well as to physical harm. Health and safety issues should always be considered, and risk assessments completed if necessary.

3.1.2 Minimal risk of harm to the environment.

3.1.3 Potential for benefit by society.

3.1.4 Voluntary informed consent by participants. Enough information should be given to participants such that they can understand what the research involves, that they are not coerced into taking part, and can withdraw if they want to. Where this is not possible, for instance in studies where covert observation is employed, or deception is involved, special safeguards or measures should be put into place.

3.1.5 Confidentiality of information supplied by research participants and anonymity of respondents (unless explicit consent is given to the contrary). Issues of lack of privacy and anonymity should always be considered and addressed. Research should conform to Data Protection legislation, including around the keeping, sharing and disposal of personal data.

3.1.6 Maintenance of the dignity of participants.

3.1.7 Independence and impartiality of researchers. Research integrity should be high, research being sound, accountable, and supervised by appropriately qualified and experienced people. Conflicts of interest should be declared. There should be transparency in declaring funding sources.

3.1.8 Appropriate publication and dissemination of research results, in line with the relevant University research governance policies. Assistance will be acknowledged.

4. The Legal Framework, the Role of Professional Associations, and Research Councils

- 4.1 All research undertaken under the auspices of the University of Greenwich must meet statutory requirements. Of particular relevance is the Equality Act 2010, as well as the Human Rights Act 1998, data protection legislation (the Data Protection Act 2018 and the General Data Protection Regulation), the

Human Tissue Act 2004 and safeguarding legislation protecting children and vulnerable adults.

- 4.2 Researchers in particular disciplines should comply with any research ethics guidelines set out by their professional associations.
- 4.3 Research involving NHS patients, staff or facilities may require approval from the [Health Research Authority](#) (HRA), including approval from an NHS Research Ethics Committee. Researchers are responsible for identifying whether their project requires HRA approval and obtaining the necessary approval, and are advised to review the guidance on the HRA's website. Any applications of this type made through the [Integrated Research Application System](#) (IRAS) would not require approval from UREB. Evidence of approval from the relevant body is required to be provided to UREB.
- 4.4 Under the Human Tissue Act, University research ethics committees (including UREB and FRECs) are not authorised to approve projects which involve the storage of human tissue (including blood) for research purposes. As the University does not hold a licence from the Human Tissue Authority, approval of projects involving the storage of human tissue should be sought from an NHS Research Ethics Committee by submitting an application through IRAS. Evidence of approval by the NHS REC should be submitted to UREB. See [Guidance on Ethical Approval for Research](#) for further details.
- 4.5 Research Councils, charitable trusts and other research funding bodies in most cases require an undertaking from grant applicants that research proposals involving human participants have been approved by the University Research Ethics Board or another appropriate body. Some also require audited compliance with their guidelines.

5. Other Relevant University Policies

- 5.1 Staff should also refer to these other University of Greenwich policies:
 - [Data Protection Policy](#)
 - [Code of Practice 7: Protection of certain categories of personal data – students and research](#)
 - [Information Security and Assurance Policy](#)
 - [Intellectual Property Policy](#)
 - [Safeguarding Policy](#)
 - [Academic Regulations for Research Awards](#)
 - [Ethical Research Collaboration Policy](#)
 - [Blood Collection Policy](#)

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