HE Research Ethics Policy

Policy Owner	Head of Higher Education and Adult
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1. Statement of Intent

1.1 This Research Ethics policy aims to establish a framework of ethical principles and standards to guide the conduct of all members of our higher education institution.

1.2 It seeks to promote integrity, accountability, and respect in all aspects of academic life, including teaching, research, administration, and community engagement.

1.3 This policy governs the ethical approval, oversight, and monitoring of research conducted by higher education students and staff, ensuring compliance with awarding body and partner university requirements.

2. Legal Background or Relevant Legislation and Guidance

a. Legislation and Regulatory Frameworks
b. UK General Data Protection Regulation (UK GDPR)
c. Data Protection Act 2018
d. Equality Act 2010
e. Human Rights Act 1998
f. Health and Safety at Work Act 1974
g. Safeguarding Vulnerable Groups Act 2006
h. Counter-Terrorism and Security Act 2015 (Prevent Duty)
i. Higher Education (Freedom of Speech) Act 2023

3. Linked/Related Policies

a. Plagiarism Policy
b. Artificial Intelligence Policy
c. Student Behaviour Policy
d. Safeguarding and Prevent Policy
e. Data Protection Policy
f. Staff Code of Conduct
g. USP Higher Education Freedom of Speech and Academic Freedom Statement
h. Internal Quality Assurance Policy

4. Scope

4.1 This policy applies to all higher education research activity conducted under the College's provision. It applies to all students enrolled on higher education programmes and all staff undertaking research activity as part of their role or academic practice.

4.2 This policy covers all forms of research activity. This includes primary research involving human participants, organisations, or environments, and secondary research involving the use, analysis, or interpretation of existing data, particularly where personal, sensitive, or identifiable information is involved.

4.3 This policy applies to all higher education students undertaking research as part of their programme of study, all higher education staff undertaking research activity, and all research conducted as part of collaborative or partner provision, including programmes validated or awarded by Coventry University, the University of Hertfordshire, or Pearson.

4.4 This policy applies to all forms of research activity, including primary research and secondary research involving the analysis or use of existing data.

4.5 This policy does not apply to routine classroom activities that do not involve formal research methodology, or internal quality assurance processes unless the data is intended for research outputs.

5. Research Ethics

5.1 All research must be conducted in accordance with relevant legislation and regulatory requirements. This includes, but is not limited to, the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and safeguarding legislation.

5.2 All research conducted by students is subject to ethical approval.

5.3 Conducting research before ethical approval is granted, or not following the methodology and terms agreed in ethical approval, are considered types of research misconduct.

5.4 Ethical approval should be achieved before any research may begin; this is particularly pertinent where research includes human participants, animals, or personal data.

5.5 Where the research is classified as low risk, it is possible that light-touch ethical approval can be organised.

5.6 Where required, research proposals that exceed the College's approval thresholds or fall within higher-risk categories will be referred to the appropriate ethics processes of the relevant partner university, in accordance with collaborative agreements.

6. Good Ethical Research Practice

6.1 Maintain comprehensive and accurate records, include applications, reviews, decisions, methods and protocols.

6.2 Ensure that the rights of the participants are always protected. Informed consent, confidentiality, and the right to withdraw from a study must be discussed with the participants.

6.3 Treat all participants with dignity and respect.

6.4 Assess, evaluate, and minimise potential risk. This includes identifying potential physical, psychological, social, or economic harms and highlighting strategies to mitigate them.

6.5 All data collected as part of research must be stored securely using College-approved systems. Personal data must be anonymised wherever possible, and access must be restricted to authorised individuals only. Data must be retained only for as long as necessary and must be disposed of securely in accordance with data protection requirements.

7. Responsibilities

7.1 All individuals involved in higher education research have a responsibility to ensure that ethical standards are upheld.

7.2 Students are responsible for seeking ethical approval prior to commencing research and for conducting their research in accordance with the approved methodology and ethical requirements.

7.3 Programme leads are responsible for reviewing student research proposals, ensuring that ethical considerations are appropriately addressed, and preventing the commencement of research that has not received appropriate ethical approval. Programme leads must provide guidance to students throughout the ethical approval process and monitor compliance during the research period.

7.4 Programme Leaders are responsible for ensuring that ethical standards are applied consistently across programmes and that students and staff are aware of the requirements outlined in this policy.

7.5 The Head of Higher Education and Adult is responsible for the oversight of research ethics processes, including the escalation of applications to the Higher Education Ethics Committee and ensuring compliance with partner university requirements.

7.6 Staff conducting their own research are required to seek ethical approval through the appropriate processes and to adhere to the same standards expected of students.

7.7 The Higher Education Ethics Committee is responsible for the review and approval of research that falls outside of low-risk criteria, as outlined in this policy.

8. Ethical Approval Process

8.1 All research undertaken by students and staff must undergo an ethical approval process prior to commencement. No research activity may begin until appropriate approval has been granted.

8.2 In the initial stages of project development, teaching staff must ensure that students are informed of the requirements for ethical approval and are supported in identifying potential ethical considerations.

8.3 The ethical approval process begins with the completion of the appropriate ethics checklist or application form. This is reviewed by the assigned programme lead to determine the level of risk associated with the research.

8.4 Low risk research may be approved at programme lead level. Where any element of risk is identified, including the involvement of human participants, sensitive topics, or identifiable personal data, the application must be referred to the Higher Education Ethics Committee for review.

8.5 Low risk research is defined as research that does not involve vulnerable participants, sensitive topics, or the collection of identifiable personal data. All other research must be subject to formal review.

8.6 Where research activity exceeds institutional thresholds or falls within higher-risk categories, it may be referred to Coventry University, the University of Hertfordshire, or Pearson as appropriate, in accordance with partnership agreements.

8.7 At undergraduate level, students will normally utilise secondary data. In such cases, the ethical approval process may be simplified, provided that the data does not include personal or sensitive information.

8.8 Upon deciding on a research methodology, students must complete the Low Risk Research Ethics Approval Checklist (LRREAC) (Appendix 1). This must be discussed with, and reviewed by, the assigned programme lead.

8.9 Where all responses on the checklist indicate no ethical risk, the project may be classified as low risk. The student must complete the Principal Investigator Certification (PIC) (Appendix 2), and the programme lead must countersign to confirm that appropriate due diligence has been carried out.

8.10 Where the checklist identifies potential ethical risks, the student must discuss the project with their programme lead. This may require amendments to the methodology or referral to the Higher Education Ethics Committee.

8.11 Where research involves human participants, additional ethical requirements apply. Participants must be provided with a Participant Information Sheet detailing the purpose of the research and how their data will be used.

8.12 Where data is collected through interviews or other direct engagement, informed consent must be obtained from all participants prior to data collection. Consent forms must be reviewed and approved by the programme lead in advance.

8.13 All Participant Information Sheets and consent documentation must include clear details on how data will be collected, stored, used, and securely destroyed following completion of the research.

8.14 Teaching staff are responsible for ensuring that all documentation relating to ethical approval is appropriately completed, reviewed, and retained in accordance with institutional requirements.

8.15 All ethical approval decisions must be recorded and maintained to support quality assurance, monitoring, and audit processes.

8.16 Any changes to an approved research project must be declared and may require resubmission for ethical approval. Research must be suspended until revised approval is granted.

8.17 If staff or students are uncertain about the ethical implications of a project at any stage, guidance must be sought from the Higher Education Ethics Committee via the Head of Higher Education and Adult.

9. Higher Education Ethics Committee

9.1 The Higher Education Ethics Committee is responsible for overseeing the ethical conduct of research within higher education provision. The committee reviews and approves research applications that fall outside low-risk criteria and ensures compliance with institutional and partner requirements.

9.2 The committee is chaired by the Head of Higher Education and Adult and includes:

a. a minimum of two academic staff members with research experience
b. a representative from the Quality team
c. a Safeguarding Lead
d. a Data Protection Officer or nominee
e. the committee may also include an external member and a student representative where appropriate.

9.3 The committee will meet at least once per term. Additional meetings may be convened as required, and urgent decisions may be made through Chair's action.

9.4 A quorum for meetings requires the Chair and at least two additional members, including one academic member and one member with safeguarding or data protection expertise.

9.5 The committee is responsible for reviewing research applications, approving or rejecting proposals, maintaining records of decisions, monitoring ethical compliance, and reporting annually to the Academic Board.

10. Risk Categories and Approval

10.1 Research is classified according to risk level in order to determine the appropriate approval route.

10.2 Low risk research may be approved by a supervisor. Medium risk research must be reviewed by the Higher Education Ethics Committee. High risk research, including research involving vulnerable groups, sensitive topics, or significant ethical implications, may require full committee review and referral to a partner university or awarding body, where necessary.

10.3 Vulnerable participants include individuals under the age of 18, individuals lacking capacity to consent, or groups considered at risk. Sensitive topics include issues that may cause distress, discomfort, or harm.

11. Data Protection and Confidentiality

11.1 All research must comply with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. Personal data must be collected only where necessary and must be processed lawfully, fairly, and transparently.

11.2 Data must be stored securely using College-approved systems and access must be limited to authorised individuals. Personal data must be anonymised wherever possible. Research data must not be stored on personal devices unless explicitly authorised.

11.3 Data must be retained in accordance with institutional retention policies and securely destroyed when no longer required.

12. Research Misconduct

12.1 Research misconduct includes conducting research without ethical approval, failing to adhere to approved methodologies, breaching confidentiality or consent agreements, and misuse of data.

12.2 Any concerns regarding research misconduct will be investigated in accordance with the College's disciplinary and academic misconduct procedures. Appropriate action will be taken where misconduct is identified.

13. Appeals

13.1 Students and staff have the right to appeal decisions made in relation to ethical approval. Appeals must be submitted in writing within ten working days of the decision.

13.2 Appeals will be reviewed by an appropriate individual or panel independent of the original decision-making process. The outcome of the appeal will be communicated in writing.

14. Monitoring and Review

14.1 The implementation of this policy will be monitored through regular review of ethical approval decisions and processes. The Higher Education Ethics Committee will produce an annual report summarising activity, including approvals, issues, and areas for improvement.

14.2 This policy will be reviewed annually to ensure continued alignment with legislative requirements and the expectations of partner universities and awarding bodies.

Appendix 1 – Low Risk Research Ethics Approval Checklist

Completion of this checklist does not replace the requirement for formal ethical approval where risk is identified.

Applicant Details

Name :	E-mail :
Department :	Date :
Course :	Title of Project :

Project Details

Summary of the project in jargon-free language and in not more than 120 words: Research Objectives Research Design (e.g. Experimental, Desk-based, Theoretical etc) Methods of Data Collection

Risk to Participants

Will the project involve human patients/clients, health professionals, and/or patient (client) data and/or health professional data?	Yes	No
Will any invasive physical procedure, including collecting tissue or other samples, be used in the research?	Yes	No
Is there a risk of physical discomfort for those taking part?	Yes	No
Is there a risk of psychological or emotional distress to those taking part?	Yes	No
Is there a risk of challenging the deeply held beliefs of those taking part?	Yes	No
Is there a risk that previous, current or proposed criminal or illegal acts will be revealed by those taking part?	Yes	No
Will the project involve giving any form of professional, medical or legal advice, either directly or indirectly to those taking part?	Yes	No

If you answered **Yes** to any of these questions, this may not be a low-risk project.

If you are a student, please discuss your project with your assigned programme lead.

Risk to Researcher

Will this project put you or others at risk of physical harm, injury or death?	Yes	No
Will the project put you or others at risk of abduction, physical, mental or sexual abuse?	Yes	No
Will this project involve participating in acts that may cause psychological or emotional distress to you or to others?	Yes	No
Will this project involve observing acts which may cause psychological or emotional distress to you or to others?	Yes	No
Will this project involve reading about, listening to or viewing materials that may cause psychological or emotional distress to you or to others?	Yes	No
Will this project involve you disclosing personal data to the participants other than your name and the College as your contact and e-mail address?	Yes	No
Will this project involve you in unsupervised private discussions with people who are not already known to you?	Yes	No
Will this project potentially place you in a situation where you may receive unwelcome media attention?	Yes	No

Could the topic or results of this project be seen as illegal or attract the attention of the security services or other agencies?	Yes	No
Could the topic or results of this project be viewed as controversial by anyone?	Yes	No

If you answered **Yes** to any of these questions, this is not a low-risk project. Please:

If you are a student, discuss your project with your assigned programme lead.

Informed Consent of the Participant

Are any participants under 18?	Yes	No
Are any of the participants unable mentally or physically to give consent?	Yes	No
Do you intend to observe the activities of individuals or groups without their knowledge and/or informed consent from each participant (or from his or her parent or guardian)?	Yes	No

If you answered **Yes** to any of these questions, this may not be a low-risk project. Please:

If you are a student, discuss your project with your programme lead.

Participant Confidentiality and Data Protection

Will the project involve collecting data and information from human participants who will be identifiable in the final report?	Yes	No
Will information not already in the public domain about specific individuals or institutions be identifiable through data published or otherwise made available?	Yes	No
Do you intend to record, photograph or film individuals or groups without their knowledge or informed consent?	Yes	No
Do you intend to use the confidential information, knowledge or trade secrets gathered for any purpose other than this research project?	Yes	No

If you answered **Yes** to any of these questions, this may not be a low-risk project:

If you are a student, discuss your project with your assigned programme lead.

Gatekeeper Risk

Will this project involve collecting data outside college buildings?	Yes	No
Do you intend to collect data in shopping centres or other public places?	Yes	No
Do you intend to gather data within nurseries, schools or colleges?	Yes	No
Do you intend to gather data within Health provider premises?	Yes	No

If you answered **Yes** to any of these questions, this is not a low-risk project. Please:

If you are a student, discuss your project with your assigned programme lead.

Other Ethical Issues

Is there any other risk or issue not covered above that may pose a risk to you or any of the participants?	Yes	No
Will any activity associated with this project put you or the participants at an ethical, moral or legal risk?	Yes	No

If you answered **Yes** to these questions, this may not be a low-risk project. Please:

If you are a student, discuss your project with your assigned programme lead.

Applications may be escalated to the Higher Education Ethics Committee where appropriate.

Appendix 2 – Principal Investigator Certification

If you answered No to all the above questions, then you have described a low-risk project. Please complete the following declaration to certify your project and keep a copy for your record as you may be asked for this at any time.

Agreed restrictions to project to allow Principal Investigator Certification

Please identify any restrictions to the project, agreed with your assigned programme lead to allow you to sign the Principal Investigator Certification declaration.

Participant Information Leaflet attached.
Informed Consent Forms attached.

Principal Investigator's Declaration

Please ensure that you:

Tick all the boxes below and sign this checklist.

Students must get their assigned faculty member to countersign this declaration.

I believe that this project does not require research ethics approval. I have completed the checklist and kept a copy for my own records. I realise I may be asked to provide a copy of this checklist at any time.	
I confirm that I have answered all relevant questions in this checklist honestly.	
I confirm that I will carry out the project in the ways described in this checklist. I will immediately suspend research and request a new ethical approval if the project subsequently changes the information I have given in this checklist.	

Signatures

If you submit this checklist and any attachments by e-mail, you should type your name in the signature space. An email attachment sent from your college inbox will be assumed to have been signed electronically.

Principal Investigator

Signed : (Principal Investigator or Student)

Date : .....

Students storing this checklist electronically must attach to it an email from your assigned faculty member confirming that they are prepared to make the declaration above and to countersign this checklist. This email will be taken as an electronic countersignature.

Student's assigned faculty member

Countersigned : (programme lead)

Date : .....

I have read this checklist and confirm that it covers all the ethical issues raised by this project fully and frankly. I also confirm that these issues have been discussed with the student and will continue to be reviewed during supervision.

Equality and Diversity Statement & Impact Assessment

USP College is committed to equality of opportunity. The aim is to create an environment in which people treat each other with mutual respect, regardless of: age, disability, family responsibility, marital status, race, colour, ethnicity, nationality, religion or belief, gender, gender identity, transgender, sexual orientation, trade union activity or unrelated criminal convictions.

This form should be used by managers and policy owners within their area of responsibility to carry out Equality and Diversity Impact Assessments (EDIAs) in relation to protected characteristics including, but not limited to: Age, Disability, Gender reassignment, Marriage and civil partnership, Pregnancy and maternity, Race, Religion and belief, Sex, Sexual orientation. The word 'policy' is taken to include strategies, policies, procedures and guidance notes; both formal and informal, internal and external.

1. Name of Policy

HE Research Ethics Policy

2. Which of the following groups could be affected by this policy?
(Tick all that apply)

Students	√
Staff	√
Wider Community	

3. Complaints

Have complaints been received from anyone with one or more protected characteristic about the service provided? If yes, then please give details.

No

4. The Impact

Four possible impacts should be considered as part of the assessment:

a. **Positive Impact -** Where the policy might have a positive impact on a particular protected characteristic.
b. **None or Little Impact –** Where you think a policy does not disadvantage any of the protected characteristics
c. **Some Impact –** Where a policy might disadvantage any of the protected characteristics groups to some extent. This disadvantage may be also differential in the sense that where the negative impact on one group of individuals with protected characteristic is likely to be greater than on another.
d. **Substantial Impact –** Where you think that the policy could have a negative impact on any or all of the protected characteristics. This disadvantage may be also differential in the sense that the negative impact on one protected characteristic is likely to be greater than on another.

Thought-provoking questions, which might help come to a decision about the impact of a policy on individuals with protected characteristics:

e. Does policy outcomes and service take up differ between people with different protected characteristics?
f. What key information do we have? Does data or engagement with people with protected characteristics give insights into areas of disadvantage, which relate to the policy area?
g. If the policy is likely to have a negative impact on individuals, sharing particular characteristics what steps can be taken to mitigate these effects?
h. Will the policy deliver practical benefits for certain groups?

i. Does the policy miss opportunities to advance equality of opportunity and foster good understanding/ relationships between groups?
j. Do other policies need to change to make this policy more effective?
k. Are there any elements of the policy that could be unlawful under the Equality Act 2010?

Use the guidance provided above and complete the following table: **(Please Tick √)**

Gender/Age	Positive Impact	No or Little Impact	Some Adverse Impact	Substantial Adverse Impact
Gender		√		
Age		√		
Disability	Positive Impact	No or Little Impact	Some Adverse Impact	Substantial Adverse Impact
Visually Impaired		√		
Hearing impaired		√		
Physical Disability		√		
Specific Learning Difficulties		√		
Global Learning Difficulties		√		
Autistic Spectrum Disorder		√		
Any other disability – Various		√		
Other Factors	Positive Impact	No or Little Impact	Some Adverse Impact	Substantial Adverse Impact
Race		√		
Culture		√		
Religious Belief		√		
Sexual Orientation		√		
Gender Reassignment		√		
Marriage/Civil Partnership		√		
Pregnancy /Maternity /Paternity		√		

Please comment on any areas where some or substantial impact is indicated. Any resulting actions must be added to the below action plan.

5. Is there anything that cannot be changed?

What cannot be changed?	Can this be justified?	If so, how?

E.g., Disabled people can be treated more favorably under the Disability Discrimination Act 2005. If a policy appears to treat disabled people more favorably than other equality groups, the disadvantage may be justifiable		

Please list the main actions that you plan to take as a result of this assessment in your area of responsibility. (Continue on separate sheets as necessary)

Action Plan: