

 <b>S P Jain London School of Management</b>	<b>Research Ethics Policy</b>
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## 1. Introduction

- a. The SP Jain London School of Management expects that all research, and the application of research, carried out at or on behalf of the School, by staff, including persons with honorary positions and collaborators, and students, is conducted to the highest level of ethical standards and in accordance with current legislation and policy requirements.
- b. The purpose of this policy is to protect:
  - i. the dignity, rights, safety and well-being of research participants;
  - ii. the safety and reputation of researchers;
  - iii. the correct use of personal data in accordance with data protection legislation
  - iv. the reputation of the School.

It is also to ensure research carried out in connection with the School is lawful; to manage and mitigate the risks arising from research; and to ensure ethical awareness is embedded.

- c. The policy sets out the required standards of researcher integrity and requirements for ethical review of research projects that must be complied with for all projects undertaken by staff and students of the School. Researchers are also subject to the ethical guidelines and codes of practice relevant to their own subject areas.

## 2. Scope

- a. The policy applies to all studies carried out in connection with the School, by staff and students.
- b. The policy covers all areas and subjects of research, but it should also be applied more broadly,

to activities such as enterprise and innovation, consultancy, the application of research, and service evaluation and audit where there are material ethical issues.

- c. Breaches of this code should be considered as research misconduct. In staff cases, this will be dealt with under the Code Of Practice For The Investigation Of Allegations Of Misconduct In Research. Student cases will be dealt with under the Academic Integrity and Misconduct Policy.

### 3. Definitions

- a. Adopting the UK Research Excellence Framework (REF), SPJL defines research as a process of investigation leading to new insights, effectively shared. It includes work of direct relevance to the needs of commerce, industry, and to the public and voluntary sectors; scholarship; the invention and generation of ideas, images, performances, and artefacts including design, where these lead to new or substantially improved insights; and the use of existing knowledge in experimental development to produce new or substantially improved materials, devices, products and processes, including design and construction. It excludes routine testing and routine analysis of materials, components and processes such as for the maintenance of national standards, as distinct from the development of new analytical techniques. It also excludes the development of teaching materials that do not embody original research.

### 4. Research integrity

- a. Researchers should ensure they carry out all their research activities in compliance with the following good practice principles, drawn from [Universities UK's concordat to support Research integrity](#) and the [UK research integrity office's code of practice for research](#), which sets out the responsibilities and values relevant to research. Adherence to good research practice can help researchers avoid allegations of research misconduct.

#### b. Principles

- i. **Excellence:** researchers should aim to conduct their research to the highest possible standards of research integrity in order to produce work of the highest quality.
- ii. **Honesty:** in all aspects of research, including the presentation of research goals, intentions and findings; in reporting on research methods and procedures; in gathering data; in using and acknowledging the work of other researchers; and in conveying valid interpretations and making justifiable claims based on research findings.
- iii. **Rigour:** in line with prevailing disciplinary norms and standards: in performing research and using appropriate methods; in adhering to an agreed protocol where appropriate; in drawing interpretations and conclusions from the research; and in communicating the results.
- iv. **Integrity:** researchers should ensure they comply with all relevant legal and ethical requirements relating to their research area. They should be aware of and declare any potential or actual conflicts of interest relating to their research, and take steps to resolve them where necessary.
- v. **Cooperation:** researchers should promote the open exchange of ideas, research methods, data and results, and their discussion, scrutiny and debate, subject to any considerations of confidentiality.
- vi. **Transparency and open communication:** in declaring conflicts of interest; in the reporting of research data collection methods; in the analysis and interpretation of data;

- in making research findings widely available, which includes sharing negative results as appropriate; and in presenting the work to other researchers and to the general public.
- vii. **Accountability:** researchers should ensure that their research activities are compliant with any agreements, terms and conditions relating to the project, ensuring and cooperating with appropriate governance and transparency. Researchers should be aware of and compliant with requirements and guidance of any professional bodies in their field of research, and those who are members of a regulated profession must follow the requirements and guidance of the body regulating their profession. In and through their work researchers are ultimately accountable to the general public and should act accordingly.
  - viii. **Training and skills:** researchers should ensure they have the necessary skills, training and resources to carry out research; they should take advantage of training opportunities provided by their host institution; and should identify, report and resolve any unmet training needs.
  - ix. **Safety:** researchers should ensure the dignity, rights, safety and wellbeing of all involved in research and avoid unreasonable risk or harm to research subjects, participants, researchers and others. Research should be initiated and continued only where the anticipated benefits justify the risks involved. Any concerns relating to the dignity, rights, safety and wellbeing of those involved in research should be reported and resolved.
  - x. **Care and respect:** for all participants in and subjects of research. Those engaged with research must also show care and respect for the stewardship of research and scholarship for future generations.

## 5. Responsibilities

- a. All **staff** who carry out research at or on behalf of the School, including persons with honorary positions and collaborators, are responsible for familiarising themselves with School's requirements for ethical review and approval of research and ensuring that the necessary approvals are sought prior to starting the research.
- b. **Supervisors** of student researchers are responsible for advising students on the ethical implications of their research, both prior to, and during the life of the project. They are also responsible for confirming where there are no ethical implications for research and signing off the stage 1 process. The academic supervisor will take ultimate responsibility for the ethical conduct of the research.
- c. **Research Ethics Coordinator** all programmes must appoint a coordinator who is responsible for reviewing all ethical checklists and approving or submitting them for a full review.
- d. All **students** are responsible for ensuring that they understand the ethical requirements as set out in modules handbooks, fulfilling these requirements and waiting until confirmation of ethical approval before starting their project.
- e. Staff and students are responsible for conducting all research in compliance with good research practice, legal requirements and professional ethical standards relevant to the subject area.

## 6. Research requiring ethical review

- a. All staff and student research must undergo ethical review before initiation of the research project.
- b. For research which is using desk-based data and which does not include human participants, the

process will require confirmation that this is the case before it is started. This will be undertaken by a self-assessment checklist which will be signed off by the supervisor as part of the project proposal and approved by the research ethics coordinator for the programme.

- c. For research which includes participants, a more in-depth review must be undertaken. This includes studies such as questionnaires and internet research where the researcher may not have direct contact with participants; and also studies involving combination of anonymous data where there is a possibility that individuals could be identified by combination of the data with another dataset or other information that is already in the public domain. Where data is collected from the internet, the checklist should also consider the methods of collection. Appropriate ethical approval must be in place before any contact with participants, or their data, begins.
- d. Research not involving human participants, but which raises other ethical issues, must also undergo ethical review before it starts. This could include research involving risks to the researcher, for example.
- e. Research activities overseas must also be reviewed to ensure that they are in compliance with legal and ethical requirements of the host country and must be able to demonstrate this with documentary evidence. Where students are undertaking research as part of an exchange with SPJ Global School of Management (SPJG), this must be approved by SPJG under its processes.

## **7. Research which will not normally be approved**

- a. The School considers that the safety of researchers is an important aspect of research ethics. Research which might endanger the individual such as research in a country where the foreign and commonwealth office advises against travel will not be approved.
- b. Research into security sensitive material will also not be approved unless the outcomes of the research outweigh the risks to the individual and the School and there is a clear link to the School mission and vision. Any research into security sensitive material must be in line with UUK guidance <https://www.universitiesuk.ac.uk/what-we-do/policy-and-research/publications/oversight-security-sensitive-research>.
- c. The School will not normally approve research involving children or vulnerable adults unless it is integral to the research interests of the member of staff.

## **8. Data protection**

- a. All personal data must be processed in line with data protection legislation and the School's Data Protection Policy. This includes providing an appropriate Privacy Statement to participants, setting out how data will be collected and processed, including deletion. It also includes proper methods of data collection, storage and deletion. Guidance on how to meet the requirements of data protection legislation are outlined in Appendix 1.

## **9. The ethical review process**

- a. The ethical review process is proportionate and risk-based, and involves two stages:

- b. The first stage is completion of a research ethics form which must be countersigned by the ethics representative for the programme or the line manager in relation to staff research. For student research, the form must also be countersigned by the supervisor who, by signing, is confirming that the mitigations of ethical risks provided by the student are appropriate.
- c. The form asks questions about the type of project to be undertaken and will identify, by a 'yes' response to any of the questions, those projects that require further, full review.
- d. If all questions on the form are answered as 'no' then the form should be recorded, along with the project protocol and supporting documentation such as questionnaires and consent forms. The researcher can continue with the project once confirmation of receipt and approval to proceed has been received.
- e. The second stage, full review for those projects that require it, involves completion of a more comprehensive application form, designed to gather all information about the study, relevant for a full review. The second stage form, along with supporting documentation (project protocol; consent forms; participant information sheets; research instruments; recruitment advertisements, etc. as appropriate) must be submitted to the Research Ethics Sub-Committee and the researcher must receive final approval from the sub-committee before initiating the study.

#### **10. Research Ethics Sub-Committee**

- a. The Research Ethics Sub-Committee will comprise a chair appointed by the Dean and the research ethics representative for each programme. The Terms of Reference are outlined in Appendix 2.

#### **11. References and additional guidance**

- a. Researchers must be aware of and comply with all relevant research integrity guidance and policy, including School guidance and requirements, their relevant professional guidelines, and codes of practice relevant to their own subject areas.

## Appendix 1: Data Protection Guidelines

### Compliance with the Data Protection Policy

Researchers **must** ensure that all data collection, analysis, storage and deletion is compliant with these guidelines to ensure that they are in line with the School's data protection policy and therefore compliant with data protection legislation.

### Informing participants

Where personal data is being collected, it must be explained to participants what data you are collecting, how it will be collected, how it will be used and how long it will be stored. There must be brief statements on the participant consent form as well as a privacy statement outlining this information in detail. There must also be a contact so that they can withdraw their permission to be part of the study. This must be referenced in the participant guidelines.

### Data collection

In respect of data collection please note the following:

- **Data collection Software** -All researchers must use the data collection software that is supported by the School. Researchers should check this before starting data collection. Please note, as Google stores its data outside of the EU, Google applications should not be used to create questionnaires.
- **Video/audio recording of interviews** - this is considered identifiable data until it is transcribed (or removed/deleted), and so this will need to be appropriately safeguarded until then. MS teams should normally be used and approval will be needed for other forms of software. Staff should not use personal phones for this purpose.
- **Collecting data from the internet** - whilst this is freely available 'in the public domain' and therefore is not considered primary data, you must still be mindful of the fact that people's images are considered biometric data. The individuals may well have consented to the use of their images on platforms such as TikTok, Twitter, Instagram etc but it is unlikely that they have consented for third party use, i.e., by yourselves to support your research project. All personal identifiers must therefore be removed and any images should be blurred to prevent identification and ensure that there is no harm the individuals concerned as no consent for this research use will be sought. You should also consider the published terms and conditions of the platforms from which data will be collected as these often have clauses covering the potential use of information by researchers. Copyright is another issue to consider, especially if the researcher is planning to publish any images in findings. If you are collecting data from the internet please also see the Association of Internet Research Internet Research Ethics 3.0. <https://aoir.org/reports/ethics3.pdf>

### Data Storage

- Staff Personal data should not store research data on personal electronic devices such as laptops, pads, mobile phones, USB's, external hard drives, or drop-boxes. It should be stored on the School OneDrive which is secure and accessible to staff.
- All recordings and transcriptions should be stored electronically on School OneDrive. Once transcription has been completed the recordings should be deleted.
- Where possible, data should be anonymised or pseudonymised.
- Staff research data should be stored in accordance with the appropriate guidelines. All personal data collected by students should be deleted as soon as the project marks have been confirmed by the

## Appendix 2: Research Ethics Sub-Committee terms of reference

### Terms of Reference of the Research Ethics Sub Committee

Terms of Reference	
Administering Entity	Learning and Teaching Committee
Latest Approval/ Amendment Date	
Last Approval/ Amendment Date	
Approval Authority	Academic Board
Indicative Time of Review	

#### 1.1 Reporting Arrangements

- a. The Research Ethics Sub Committee reports to the Learning and Teaching Committee

#### 1.2 Purpose and Scope

- a. The primary role of Research Ethics Sub Committee is to:
- i. Provide advice to the Learning and Teaching Committee on the Research Ethics Policy and procedures;
  - ii. Review applications for ethical approval
  - iii. Promoting awareness of research ethics across the School.

#### 1.3 Responsibilities

- a. To review the Research Ethics Policy and make recommendations to the Learning and Teaching Committee
- b. To monitor the two stage ethical approval policy to ensure that it is fit for purpose
- c. To review the Research Code of Practice for the Investigation of Allegations of Misconduct In Research and make recommendations to the Learning and Teaching Committee
- d. To review cases of research misconduct for students and make recommendations to ensure that such cases are minimised.
- e. To monitor stage 1 ethical approvals
- f. To consider and determine stage 2 ethical reviews
- g. Seeking appropriate external advice from an appropriate person for complex cases.

#### 1.4 Membership

- a. Chair, nominated by the Dean.
- b. A member from each programme offered by the School responsible for research ethics for that programme.

#### 1.5 Administrative support

- a. An appropriate member of administrative staff will be secretary to the Sub-Committee.

#### 1.6 Term of Office

- a. The Chair will be nominated for periods of three years
- b. Other members will continue to serve while they are the person responsible for research ethics for their programme

**1.7 Meeting Frequency and Quorum**

- b. The Sub Committee will meet at least twice per year to review policy issues and as required to review requests for stage 2 ethical approvals
- c. Quorum of half the membership (not including casual vacancies).