BLOOMSBURY INSTITUTE LONDON

Research Ethics Code of Practice

2021-22

Index

Committee Approval

Committee	Committee Action	Date
QAEC	Recommended Approval	21 July 2021
Academic Committee	Approved	28 July 2021
	Date in force	**1 September 2021**

This Code of Practice will be reviewed annually by our Quality Assurance and Enhancement Committee (QAEC). Any amendments will be subject to approval by the Academic Committee.

1. Introduction

Our Research Strategy 2021-24 articulates how we develop, support and empower all our staff to achieve excellence in research that has considerable internal and/or external impact, reflected through direct relevance to the needs of commerce, industry, culture, and society; to the public and voluntary sectors; and also to ourselves.

We expect that our researchers will carry out their research to the highest ethical standards, while respecting the principles of academic freedom and freedom of speech. Regulation 3 of our Articles of Association provides that we will:

- Respect the principle of academic freedom, subject to compliance with the Institute's equality, diversity and inclusion policies and procedures, and subject to compliance with any legislative or regulatory requirements

- Respect the principle of freedom of speech for all students enrolled on a course delivered by the Institute, members of the Bloomsbury Institute Student Guild, staff employed by the Institute, external speakers, the directors and the shareholders, subject to compliance with the Institute's equality, diversity and inclusion policies and procedures, and subject to compliance with any legislative or regulatory requirements

Our Research Ethics Approval Procedures set out how we achieve this (see **Section 4** below).

2. Scope

This Code of Practice applies to all staff who undertake research within the scope of their employment with Bloomsbury Institute. Where there is more than one member of staff engaged in a research project, a Lead Bloomsbury Institute Researcher is responsible for ensuing compliance with this Code of Practice.

It also applies to persons (including students) who undertake collaborative research with such member of staff. Where collaborative research is undertaken, the Bloomsbury Institute Researcher is responsible for ensuing compliance with this Code of Practice.

It does not apply to students who are completing a dissertation or research project as part of their degree.

3. Research and scholarship

All staff (academic and professional services) are developed, supported and empowered to engage in research.

All academic staff are required to engage in scholarship.

We have simple, clear and distinct definitions of research and scholarship:

Research is defined as a process of investigation leading to new insights, effectively shared[1]. It includes work of direct relevance to the needs of commerce, industry, culture, and society; to the public and voluntary sectors; and also to ourselves. It includes research that is published, disseminated or made publicly available in the form of assessable research outputs[2], for example:

[1] This definition of research is partially taken from the REF 2021 Guidance on Submissions, Jan 2019 (Document REF 2019/01) as amended in October 2020, available at: www.ref.ac.uk/publications/guidance-on-submissions-201901/

[2] By implication, contract and consultancy research that is subject to a confidentiality statement and which cannot, therefore, be "published, disseminated or made publicly available" does not come within our scope of research, although it could lead to a scholarly output that has an internal and/or external impact. However, it should be noted that a confidential report could form part of an institution's REF 2021 submission provided a quality and

- Presenting a research paper at an internal Research Seminar, Widening Participation Forum or Annual Teaching and Learning Conference
- Presenting a research paper at an external conference
- Publishing a research paper in our Working Paper Series
- Publishing an article in a peer-reviewed journal
- Publishing a monograph
- Publishing teaching materials that embody original research
- Publishing other academic-related materials that embody original research
- Publishing professional services materials that embody original research

Scholarship is defined as activities which are undertaken to ensure academic staff have an up-to-date and current knowledge of their discipline, with appropriate breadth and depth to enable them to create high-quality learning experiences for students, and which of itself could lead to other outputs that have internal and/or external impact. It includes, *inter alia*:

- Responding to developments within the discipline to ensure the curriculum remains current
- Reflecting critically on teaching performance, making improvements to its practice and engaging with pedagogical issues
- Keeping up-to-date with the use of learning technology
- Undertaking personal research (to include undertaking a doctoral degree)
- Attending internal forums (e.g. Research Seminars; Widening Participation Forum; Teaching and Learning Forum)
- Attending our Annual Teaching and Learning Conference
- Attending external conferences
- Writing student textbooks
- Publishing short articles in professional journals
- Development of case studies

4. Research Ethics Approval Procedures

We expect that all research we support will be carried out to the highest ethical standards.

This Code of Practice is designed to ensure that, while recognising our respect for the principles of academic freedom and freedom of speech:

impact assessment can be undertaken. This would require the confidentiality statement to be lifted to enable such assessment.

- Any research undertaken will comply with our equality, diversity and inclusion policies and procedures, including our Ethics Policy

- Any research undertaken will comply with any legislative or regulatory requirements

- If a researcher travels outside of the UK to undertake research, the researcher will comply with any overseas legislative or regulatory requirements, and the safety of the researcher will not be compromised

- Any research undertaken that involves a potentially highly sensitive research topic, the use of personal data and/or human participants is subject to formal approval by the Research Ethics Committee prior to the commencement of the research

4.1 Research Ethics Approval Form

The Research Ethics Approval Form (see **Appendix 1**) must be completed by all staff who intend to undertake research within the scope of their employment with Bloomsbury Institute.

Only one Form should be submitted.

Where there is more than one member of staff engaged in a research project, a Lead Bloomsbury Institute Researcher should be appointed who will be responsible for completing the Form on behalf of all researchers.

If students and/or persons who are not employed by Bloomsbury Institute are involved in the research project, the Bloomsbury Institute Researcher will be responsible for completing the Form on behalf of all researchers.

This does not apply to students who are completing a dissertation or research project as part of their degree.

Advice on how to complete the Form is available by emailing research.ethics@bil.ac.uk

The completed Form should be submitted to the Secretary of the Research Ethics Committee. If the Research Ethics Committee is required to provide research ethics approval, the Form must be submitted at least two weeks prior to the meeting of the Research Ethics Committee.

4.2 The five stages of research ethics approval

The Secretary of the Research Ethics Committee will forward each Research Ethics Approval Form to the Chair of the Research Ethics Committee.

Should the researcher be the Chair of the Research Ethics Committee, the proposal must be considered by the Research Ethics Committee.

Otherwise, the Chair of the Research Ethics Committee will progress the Form through the following five stages (where applicable):

- **Stage 1:** If any researcher involved in the research project intends to travel outside of the UK to undertake research, this will be considered by the Chair of the Research Ethics Committee who may refer the matter to the Research Ethics Committee for advice.

- **Stage 2:** If the research does not involve a potentially highly sensitive topic area, the use of personal data or human participants, the Chair of the Research Ethics Committee can provide research ethics approval without referring the matter to the Research Ethics Committee.

- **Stage 3:** If the research involves a potentially highly sensitive topic area, the Chair of the Equality Diversity and Inclusion Committee (EDIC) and the Prevent Lead must

consider the proposal and make a recommendation with regards to research ethics approval to the Research Ethics Committee.

- **Stage 4:** If the research involves the use of personal data, the Data Protection Officer (DPO) must consider the proposal and make a recommendation with regards to research ethics approval to the Research Ethics Committee.

- **Stage 5:** If the research involves human participants, the Research Ethics Committee will decide whether to provide research ethics approval.

These five stages are illustrated in **Appendix 3**: **Research Ethics Approval Procedures - Flowchart**. They are explained in further detail below.

Note: Research must not be started until notification of approval is received from the Secretary of the Research Ethics Committee.

4.2.1 Stage 1: Researcher travels outside of the UK to undertake research

If any researcher involved in the research project intends to travel outside of the UK to undertake research (see **Part 2** of the **Research Ethics Approval Form**), the Chair of the Research Ethics Committee must be satisfied that the researcher will comply with any overseas legislative or regulatory requirements, and the safety of the researcher will not be compromised (taking into account any advice provided by the UK Government at: www.gov.uk/foreign-travel-advice). The latter point is of particular importance during the Covid-19 pandemic.

The Chair of the Research Ethics Committee may refer the proposal to the Research Ethics Committee for advice, prior to making a decision.

4.2.2 Stage 2: Standard approval by the Chair of the Research Ethics Committee

The Chair of the Research Ethics Committee is authorised to provide research ethics approval without the need for the proposal to be considered by the Research Ethics Committee, provided the research does **not** involve **any** of the following:

- A potentially highly sensitive research topic (see **Part 3** of the **Research Ethics Approval Form**);

- The use of personal data (see **Part 4** of the **Research Ethics Approval Form**); or

- Human participants (see **Part 5** of the **Research Ethics Approval Form**).

4.2.3 Stage 3: Potentially highly sensitive research topic

If the proposed research involves a potentially highly sensitive research topic (see **Part 3** of the **Research Ethics Approval Form**), approval is required from the Research Ethics Committee.

The following potentially highly sensitive research topics are subject to a higher level of scrutiny:

- Race or ethnicity

- Political opinion

- Religious, spiritual or other beliefs

- Physical or mental health conditions

- Sexuality and/or gender identity

- Child and/or adult abuse
- Criminal activities
- Political asylum
- Conflict situations
- Violence to the person
- Terrorism or violent extremism
- Any other topic which, because of its subject matter, may be classified as 'potentially highly sensitive'

The research proposal will be considered by the Chair of the Equality, Diversity and Inclusion Committee (EDIC) and the Prevent Lead prior to the proposal being considered by the Research Ethics Committee.

The Chair of the EDIC and the Prevent Lead will make a recommendation to the Research Ethics Committee with regards to research ethics approval in relation to the research topic.

If necessary, the Chair of the EDIC may consult with the EDIC (or some of its members) prior to making a decision.

It should be noted that conducting research to a high ethical standard does not mean that potentially highly sensitive research topics should be avoided. A potentially highly sensitive research topic will be approved, thus recognising our respect for the principles of academic freedom and freedom of speech, provided it complies with:

- Our equality, diversity and inclusion policies and procedures (including our Ethics Policy); and
- Any legislative or regulatory requirements (including the Prevent duty).

4.2.4 Stage 4: Research involves the use of personal data

If the proposed research involves the use of personal data (see **Part 4** of the **Research Ethics Approval Form**), approval is required from the Research Ethics Committee.

The research proposal will be considered by the Data Protection Officer (DPO) prior to the proposal being considered by the Research Ethics Committee.

The DPO will make a recommendation to the Research Ethics Committee with regards to research ethics approval in relation to the use of personal data.

When deciding whether to provide research ethics approval, the Research Ethics Committee will need to be assured that:

- All researchers involved in the research project understand the legal obligations associated with data protection;
- All researchers involved in the research project have completed all relevant Bloomsbury Institute online GDPR training, including refresher training [if a researcher is not employed by Bloomsbury Institute, there must be evidence that the researcher understands the legal obligations associated with data protection; e.g. by having undertaken alternative training];
- All researchers involved in the research project will comply with such legal obligations;

- If the research involves the use of administrative or secure data (e.g. data collected by the government or a government agency), the relevant researcher will seek the necessary permission from the appropriate authority before the data is used;

- If the research involves the sharing with a third-party of data or confidential information, the relevant researcher will obtain all necessary consent prior to sharing such data or confidential information with a third-party;

- If data/information will be collected from participants, the method of collection must be appropriate (e.g. collection on a confidential or anonymous basis);

- That any data/information will be used by all researchers involved in the research project appropriately; and

- That any data/information will be stored by all researchers involved in the research project securely and for no longer than necessary.

4.2.5 Stage 5: Research involves human participants

If the proposed research involves human participants (see **Part 5** of the **Research Ethics Approval Form**), approval is required from the Research Ethics Committee.

The Research Ethics Committee will seek to ensure that appropriate safeguards (for both the participants and the researcher) are in place if the research potentially involves particularly vulnerable participants, for example:

- Persons under 18 years of age

- Persons who lack mental capacity

- Persons who suffer from a psychiatric or personality disorder

- Persons with a severe disability

- Persons who are frail or in poor health

- Elderly persons

- Persons who are in care

- Persons who only have a basic knowledge of the English language

- Family members of the researcher

- Persons who may feel they are obliged to participate in the research (e.g. the researcher's students)

Such safeguards may require all or some of the researchers who are involved in the research project to undergo a basic or enhanced Disclosure and Barring Service (DBS) check that is valid (or renewed) throughout the duration of the research.

When deciding whether to provide research ethics approval, the Research Ethics Committee will need to be assured that:

- The information provided to participants is clear and appropriate;

- The way in which participants are targeted/recruited/selected is appropriate;

- Participants will not be identified within the research, either directly or indirectly;
- The Consent Form is clear and appropriate;
- Participants can withdraw from the research at any time, and will have this option made clear to them;
- If participants may feel they are obliged to participate in the research (e.g. the researcher's students), that the information provided to the participants makes it clear that they are not obliged to participate and that they will not suffer any detriment if they do not participate; and
- Any financial inducements offered to participants (other than reasonable expenses and compensation for time) will not affect the validity of the research.

Participant Consent Form

A suggested **Research Project: Participant Consent Form** is available at **Appendix 2**.

If, for example, the research will gather evidence from participants through an online questionnaire, it may be beneficial to incorporate the requirements for participant consent into the actual online questionnaire. For example, the following could be included at the beginning of the online questionnaire:

- Name of the Bloomsbury Institute Researcher and contact details if the participant has any questions
- Title of the Research Project
- Link to an information sheet setting out the scope of the Research Project, and the role of the participants [or including the information sheet as text]
- The following statement (amended as appropriate)

  By completing this online questionnaire, I am confirming that I have read and understand the scope of this Research Project, that I understand my role as a participant, and I have had the opportunity to ask any questions.

  I understand that any data/information that I provide shall be used for this Research Project on a **confidential/anonymous basis**. *[The Researcher should delete the one that is not applicable and include one of the following two statements]*

  Confidential basis means that the researcher will know that you provided the data/information, but the published research project will not link the data/information to you. **OR** **Anonymous basis** means that the researcher will not know what data/information you have provided.

  I understand that my participation is voluntary and that I am free to withdraw at any time, without giving reason.

  I agree to take part in the above Research Project.

  I am competent to make an informed consent to participate in this Research Project.

- The following additional statement, if applicable:

  I agree to the use of anonymised quotes to be included within the Research Project.

5. Research Ethics Committee

5.1 Terms of Reference

- Receiving and considering for approval Research Ethics Approval Forms where the proposed research involves a potentially highly sensitive research topic, personal data and/or human participants.
- Receiving and considering for approval Research Ethics Approval Forms that are referred by the Chair of the Research Ethics Committee.
- Approving a Research Ethics Annual Report.

5.2 Membership

- One member of staff who holds a PhD and who is research-active (Chair)
- Chair of the Research Forum
- RDP Coordinator
- One other member of staff who holds a PhD and who is research-active
- Chair of the Equality, Diversity and Inclusion Committee (EDIC) (or nominee)
- Prevent Lead (or nominee)
- Data Protection Officer (DPO)

The Quality and Compliance Division provides a secretariat service.

5.3 Conflict of interest

If a member's Research Ethics Approval Form is being considered by the Committee, the member must leave the meeting during any discussions, will not participate in any decision, and will only return to the meeting after the discussion and decision have been concluded.

5.4 Quorum

No business other than the appointment of a Chair shall be transacted at any meeting of the Research Ethics Committee if the persons attending it do not constitute a quorum. Three members shall constitute a quorum, that must include at least two members who hold a PhD.

If such a quorum is not present within fifteen minutes from the time appointed for the meeting, the meeting shall stand adjourned.

6. Related regulations, policies and procedures

- Data Protection Policy
- Equality, Diversity and Inclusion Policy
- Ethics Policy
- Internet Acceptable Use Policy

- Prevent Policy
- Research Development Plan 2021-22
- Research Ethics Approval Form [see **Appendix 1**]
- Research Project Participant Consent Form [see **Appendix 2**]
- Research Ethics Approval Procedures - Flowchart [see **Appendix 3**]
- Research Strategy 2021-24

7. Review of the Research Ethics Code of Practice

This Code of Practice will be reviewed annually by our Quality Assurance and Enhancement Committee (QAEC). Any amendments will be subject to approval by the Academic Committee.

Appendix 1: Research Ethics Approval Form

This Form must be completed by any member of staff who undertakes research within the scope of their employment with Bloomsbury Institute.

Where there is more than one member of staff engaged in a research project, a Lead Bloomsbury Institute Researcher should be appointed who will be responsible for completing the Form on behalf of all the researchers.

If students and/or persons who are not employed by Bloomsbury Institute are involved in the research project, the Bloomsbury Institute Researcher will be responsible for completing the Form on behalf of all the researchers.

NOTE: This form should **not** be completed by students who are completing a dissertation or research project as part of their degree.

Advice on how to complete this Form is available by emailing research.ethics@bil.ac.uk

The Form should be submitted to the Secretary of the Research Ethics Committee. If the Research Ethics Committee is required to provide research ethics approval, the Form must be submitted at least two weeks prior to the Research Ethics Committee meeting.

Part 1: General

1.1	Project Title	

1.2	Name of Bloomsbury Institute Researcher [Lead Bloomsbury Institute Researcher if more than one researcher]	
1.3	Position	
1.4	Email address	
1.5	State the name(s) of any other member of Bloomsbury Institute staff who is involved in the research	
1.6	State the name(s) of any Bloomsbury Institute student who is involved in the research	
1.7	State the name(s) and affiliation (e.g. university, professional body) of any other person who is involved in the research	
1.8	If the research is being funded or sponsored by an external source, please provide details	

Part 2: Researcher travels outside of the UK to undertake research

2.1	Will any of the researchers travel outside the UK to undertake the research?	

If you answered yes to 2.1, please complete 2.2 and then complete Part 3.

If you answered no to 2.1, please complete Part 3.

2.2	State which of the researchers will travel outside of the UK to undertake the research, in which countries the research will take place, and explain how any local legislative or regulatory requirements will be complied with.	

Part 3: Potentially highly sensitive research topic

3.1	Does the research involve any of the following?	
	Race or ethnicity	
	Political opinion	
	Religious, spiritual or other beliefs	
	Physical or mental health conditions	
	Sexuality and/or gender identity	
	Child and/or adult abuse	
	Criminal activities	
	Political asylum	
	Conflict situations	
	Violence to the person	
	Terrorism or violent extremism	
	Any other topic which, because of its subject matter, may be classified as 'potentially highly sensitive'	

If you answered yes to any of the topics listed at 3.1, please complete 3.2 to 3.4, and then complete Part 4.

If you answered no to each of the topics listed at 3.1, please complete Part 4.

3.2	Provide a clear summary of the proposed research (maximum 150 words).	
3.3	Explain how the proposed research will comply with our equality, diversity and inclusion policies and procedures.	
3.4	Explain how the proposed research will comply with any legislative or regulatory requirements (including the Prevent duty).	

Part 4: Research involves the use of personal data

4.1	Does the research involve the use of personal data?	

If you answered yes to 4.1, please complete 4.2 to 4.10, and then complete Part 5.

If you answered no to 4.1, please complete Part 5.

4.2	Do all of the researchers understand the legal obligations associated with data protection? A guide is available at: ico.org.uk/for-organisations Further guidance is available from our Data Protection Officer (DPO)	
4.3	Have you completed the Bloomsbury Institute GDPR online training and any Refresher training (if required)?	
4.4	[If applicable] Have all the other researchers undertaken the above GDPR training? [If no, please provide details of how the researcher(s) understand(s) the legal obligations associated with data protection] **Note:** JISC has a free training video available at: https://youtu.be/S86E-r1tB_U	
4.5	How will you and any other researcher ensure compliance with the legal obligations associated with data protection?	
4.6	Does the research involve administrative or secure data (e.g. data collected by the government or a government agency) that requires permission from the appropriate authority before use?	
	If you answered yes to 4.6, please provide details of how any researcher who will be using administrative or secure data will seek the necessary permission(s) before the data is used.	
4.7	Does the research involve the sharing with a third-party of data or confidential information?	
	If you answered yes to 4.7, please state how any researcher who will be sharing data or confidential information with a third-party, will	

	obtain the necessary consent(s) before sharing such data or confidential information with a third-party.	
4.8	Will data/information be collected from human participants?	
	In you answered yes to 4.8, please state whether the data will be collected from the participants on a confidential basis (i.e. the researcher will know who provided the data/information, but any research output will not link data/information to any specific participant) or on an anonymous basis (i.e. the researcher will not know who provided the data/information).	
4.9	How will the data/information be used?	
4.10	How will each researcher ensure that the data/information is stored securely?	
4.11	How will each researcher ensure that the data/information is stored for no longer than necessary?	

Part 5: Research involves human participants

5.1	Does the research involve human participants?	

If you answered yes to 5.1, please complete 5.2 to 5.10, then go to Part 6 to sign/date the form, and then submit it to the Secretary of the Research Ethics Committee.

If you answered no to 5.1, please go to Part 6 to sign/date the form, and then submit it to the Secretary of the Research Ethics Committee.

5.2	Does the research "potentially" involve particularly vulnerable participants, for example: • Persons under 18 years of age • Persons who lack mental capacity • Persons who suffer from a psychiatric or personality disorder • Persons with a severe disability • Persons who are frail or in poor health • Elderly persons • Persons who are in care • Persons who only have a basic knowledge of the English language • Family members of the researcher • Persons who may feel they are obliged to participate in the research (e.g. the researcher's students)	
	If you answered yes to 5.2, please provide full details, including details of any safeguarding mechanisms (for both the participants and all the researchers).	
5.3	Please provide a clear statement of the output of the research	
5.4	Please provide a copy of the information that will be provided to participants about the research project and the role of the participant	
5.5	Please provide details of how participants will be targeted/recruited/selected	
5.6	Will participants be identified within the research either directly or indirectly? [Note: Ethics approval will **not** be granted if participants could be identified within the research either directly or indirectly]	
5.7	Please provide a copy of the proposed Consent Form [using the Consent Form Template or the online declaration]	

5.8	Please provide information about how a participant can withdraw from the research [this should be included in the information provided to participants at 5.4]	
5.9	Does the research involve participants who may feel obliged to participate (e.g. family members of a researcher; student of a researcher)?	
	If you answered yes to 5.9, please provide information about how a participant is informed that they are not obliged to take part in the research and that if they do not participate they will not suffer any detriment [this should be included in the information provided to participants at 5.4]	
5.10	Will financial inducements be offered to participants (other than reasonable expenses and compensation for time)?	
	If you answered yes to 5.10, please provide full details.	

Part 6: Signature

Signature of Researcher:	Date:

Please submit the completed Form to research.ethics@bil.ac.uk

Decision [For Bloomsbury Institute use only]

	Chair of Research Ethics Committee	Chair, EDIC	Prevent Lead	Data Protection Officer	Research Ethics Committee (REC)
Recommend approval to REC					
Recommendation subject to the following conditions					
Not recommended for approval to REC [please state reasons]					
Approved					
Approved subject to the following conditions					
Not approved [Please state reasons]					
Date					

Appendix 2: Research Project Participant Consent Form

Full title of Research Project:	
Name, position and email address of Bloomsbury Institute Researcher:	

If you have any queries when completing this form, please email research.ethics@bil.ac.uk for advice.

1. I confirm that I have read and understand the information sheet for the above Research Project, that I understand my role as a participant, and I have had the opportunity to ask questions.	Yes/No
2. I understand that any data/information that I shall provide shall be used for this Research Project on a **confidential basis/anonymous basis**. **Confidential basis** means that the researcher will know that you provided the data/information, but the published research project will not link the data/information to you. **Anonymous basis** means that the researcher will not know what data/information you have provided. **Note: Before submitting Form for approval, the Bloomsbury Institute Researcher must delete whichever is not applicable: *confidential basis* or *anonymous*** 	Yes/No
3. I understand that my participation is voluntary and that I am free to withdraw at any time, without giving reason.	Yes/No
4. I agree to take part in the above Research Project.	Yes/No
5. I am competent to make an informed consent to participate in this Research Project.	Yes/No

Note: Include the following statements if appropriate, or delete from your consent form – include any other questions that may be applicable

5. I agree to any interview / focus group / consultation being audio recorded.	Yes/No
6. I agree to any interview / focus group / consultation being video recorded.	Yes/No
7. I agree to the use of anonymised quotes to be included within the Research Project.	Yes/No

Name of Participant	Signature	Date
Name of Researcher	Signature	Date

Appendix 3: Research Ethics Approval Procedures – Flowchart

Note: Should the researcher be the Chair of the Research Ethics Committee, the proposal must be considered by the Research Ethics Committee.