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Research Ethics Policy

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Purpose

- 1 This policy provides a framework for decision making on ethical issues that aims to safeguard and protect the rights of University researchers, research participants, other stakeholders, cultures, and the planet.
- 2 This policy should be read in conjunction with the [Code of Good Research Practice](#), which sets out the University's approach to research integrity, and the Guidelines for Ethical Research and Gaining Ethical Approval, which provide more detailed information and instruction for researchers and Research Ethics Panel reviewers.

Applicability and Scope

- 3 This policy applies to all research involving human and/or animal participants conducted by researchers under the auspices of the University. It also includes other types of research that may raise ethical issues or concerns including, but not restricted to, research that may pose risk of damage to the environment, use texts, artefacts, or sites of religious or cultural significance, or technologies with maleficent potential.
- 4 This policy does not apply to other strategic and financial interests of the University.
- 5 This policy does not apply to service evaluations or knowledge exchange activities, for the purposes of internal or external dissemination, except where an academic research output might also be sought as part of the activity.
- 6 This policy may not apply where a creative practice project is undertaken where inclusion of people in the process of developing project-based work and making decisions is inherent to such practice, or where professionals are appointed as project contributors (e.g. photography models).
- 7 Human participants are defined as human beings, human tissue and bodily fluids, human data and records (e.g. medical, genetic, financial, personnel, criminal or administrative records and test results including scholastic achievements), and photographs and videos of individuals. Anonymised human data generated, with prior consent, for another purpose do not meet this definition of human participants.
- 8 Animal participants are defined as live animals, animal tissue and bodily fluids used for testing or experimentation, or for other research purposes (e.g. in the creation of artefacts in art and design research projects). In the UK, research procedures carried out on protected animals (living vertebrates, other than human, and cephalopods; at defined stages of development) are regulated by the Animals (Scientific Procedures) Act 1986 and Directive 2010/63/EU.
- 9 This policy applies to all University employees, all students of the University, and other individuals who are undertaking research using the University's premises or facilities and/or in the University's name.

Principles

- 10 All researchers should be aware of the ethical issues that may arise in the course of their work and should be encouraged to take responsibility for their own ethical actions. They should consider ethical issues through the lifecycle of their research project and be continually reflective as the research progresses.
- 11 Researchers have a duty to understand humans' moral obligations to protect and preserve the environment. Research must be conducted in line with such understanding and safeguard against cruelty to all creatures and ecosystems, therefore considering and preventing excessive carbon footprint, energy consumption, and potentially harmful acts derived by the research against the environment.
- 12 Research that requires the use of animals or animal tissue must maintain good animal welfare in line with guidance by the Animal Welfare Ethical Review Body (AWERB) and comply with the Animals (Scientific Procedures) Act 1986 (ASPA), amended in 2012.
- 13 Research must be undertaken in accordance with any applicable common law or legislation, including those from other countries, if relevant.
- 14 Research must be undertaken with respect for, and a conviction to preserve any cultures that are the subject or site of the study.
- 15 Where at all possible, an inclusive and liberatory approach to research should be adopted. This might include:
 - a. The co-design of research projects with intended beneficiaries.
 - b. Consultation with different groups and sub-groups within the research and acknowledging the barriers and enablers of different research designs.
 - c. The adoption of equitable sampling strategies and accessible participant recruitment documents and data generation tools.
 - d. The generation of diverse perspectives through the research and reporting that reflect results for sub-groups, not just the sample as a whole.
 - e. Appropriate acknowledgement for all contributors.
- 16 Researchers should avoid, prevent, or minimise harm to others in the widest sense. Human and animal participants should not be subjected to unnecessary risks or discomfort and their participation in the research must be essential to achieving aims that could not be realised without their participation. The principle of minimising harm also requires that the minimum number of participants that will ensure valid data should be employed.
- 17 The physical, mental, and social wellbeing of the participants should be promoted. Protection of the participants is the most important responsibility of the researcher.
- 18 The benefits of the research (i.e. its impact or contribution to the literature) must be evidenced or effectively argued, and any risks considered in the context of those benefits.

- 19 There should be equality in distribution of benefits and risks among the population group(s) likely to benefit from the research.
- 20 Everyone involved in a research project should be treated fairly. Researchers should weigh up and make judgements about competing claims and interests of all involved in the research, regardless of the vested interests of the researchers.
- 21 Human participants must give their informed consent before taking part in research. Valid consent must be obtained voluntarily, not by coercion or manipulation, and participants must be given sufficient information and time to make a judgement.
- 22 Participants should be selected in an equitable way avoiding, where possible, any populations that may be coerced into taking part. Where power relationships do exist between researchers and *essential* (to the research) participant populations, all measures should be taken to ensure the voluntariness of their participation.
- 23 Consideration must be given to vulnerable people or groups whose diminished decision-making capacity makes them vulnerable. Vulnerable people include children, prisoners, and adults with mental health problems or learning disabilities, and all measures should be taken to ensure the voluntariness of their participation.
- 24 Human participants have the right to withdraw their consent and cease their involvement in the research at any time before or during the data generation process, without penalty or the requirement to give reasons. Where possible, participants should be able to withdraw the research data they have contributed until it is no longer practical to do so (e.g. after the analysis or anonymisation of data).
- 25 Researchers should take precautions to protect the confidentiality of participants. Personal data should only be collected, stored and/or shared if necessary, and in line with the Data Protection Act 2018. Research data should be anonymised, at the earliest possible time, unless a strong case for non-anonymisation or de-anonymisation can be made by the researcher.
- 26 Anonymised research data should be stored for a minimum of three years and may be shared on request.

Ethics review framework

- 27 Any research falling within the Applicability and Scope of this policy document (Paragraphs 3-9) will undergo scrutiny by the University Research Ethics Panel (UEP), its subcommittees, or formally nominated representatives, with two exceptions:
 - a. Where ethical approval has been obtained from another UK institution for a collaborative project, further approval is not required unless University staff or students will be recruited as participants.
 - b. Where ethical approval is required from a recognised external body, such as the Health Research Authority (HRA) or the Ministry of Defence Research

Ethics Committee (MoDREC), further approval is not required unless University staff or students will be recruited as participants. However, applications to these bodies must be endorsed by the chair or secretary of the UEP.

- 28 The UEP is a formal body of academic and some PSE employees charged with promoting, regulating, and monitoring ethical research practice in the University, and is a standing committee of the Research and Enterprise Committee. The UEP's Terms of Reference can be found [here](#).
- 29 Each Academic School will have at least one Research Ethics Subcommittee to consider research investigations undertaken by students on taught programmes. All subcommittees will provide annual summaries of their activities to the UEP.
- 30 Research should not begin until ethical review has taken place and approval confirmed.
- 31 Research projects are normally approved for two-years from receipt of confirmation of approval. Longitudinal projects, which require a data collection period of more than two-years, will be approved for a stated time period.
- 32 Any extensions for an additional time period or any significant divergence from the approved project must be subject to further scrutiny by the UEP, its subcommittees, or formally nominated representatives.
- 33 In line with sector best practice, retrospective ethical approval will not be considered by the UEP, its subcommittees, or formally nominated representatives.
- 34 At the end of the period of ethical approval, applicants will be required to complete a brief project completion form.
- 35 Following initial approval, the UEP may impose ongoing monitoring and conditions on projects that it considers to be high-risk.

Appeals

- 36 Employees and research students may appeal the decision by UEP within 10 working days of receipt by emailing ResearchUnit@bnu.ac.uk, stating their grounds for appeal, and providing evidence where available.
- 37 Appeals by employees and research students will only be considered on the grounds of procedural irregularities, bias or reasonable perception of bias, and/or an undeclared conflict of interest in the review process. However, there is no limit to the number of times an employee or research student may resubmit an application to UEP with further evidence or mitigation of risks.
- 38 Assessment of appeals by employees and research students will be undertaken by the chair of the Research and Enterprise Committee.
- 39 Students on taught programmes may appeal the decision by a School subcommittee within 10 working days of receipt by emailing the subcommittee's lead, stating their grounds for appeal, and providing evidence where available.

- 40 Appeals by students on taught programmes will only be considered on the grounds of procedural irregularities, bias or reasonable perception of bias, and/or an undeclared conflict of interest. If a student on a taught programme has no further opportunities to resubmit their application, they will also be permitted to appeal on the grounds of new and improved mitigation of risks, which, for valid reasons, could not have been applied at the time of review.
- 41 Assessment of appeals by students on taught programmes will be undertaken by a member of the School's senior management team.

Research misconduct

- 42 Research participants should be informed about who to contact to make a complaint about the research or researcher. Normally, this information would be included on the participant information sheet.
- 43 For all students, including research students, complaints should be lodged with the principal supervisor in the first instance, but may be escalated to the chair of the UEP (for research students) or the lead of the relevant subcommittee (for taught students).
- 44 For employee research, complaints should be lodged with the chair of the UEP in the first instance but may be escalated to the chair of the Research and Enterprise Committee.
- 45 Where complaints against BNU students are received, the procedures outlined in the [Student Code of Conduct](#) will be followed. Informal resolutions will be considered, where appropriate, before recourse to the formal complaints procedure.
- 46 Where complaints about BNU employees are received, the procedures outlined in the [Employee Disciplinary Policy and Procedure](#) will be followed. Informal resolutions will be considered, where appropriate, before recourse to the formal complaints and disciplinary procedure. No disciplinary action will be taken until the case has been fully investigated.
- 47 In line with sector expectations for research integrity, researchers should self-declare any known breaches of ethical codes or deviation from the research protocols approved by the UEP.
- 48 All employees have a right and duty to raise concerns about research misconduct. These should normally be raised through the chair or the secretary of the UEP. However, employees may also raise their concerns confidentially to whistleblowing@bnu.ac.uk, which will be received by the Human Resources Directorate.
- 49 All concerns about research misconduct will normally be dealt with in line with the Employee Disciplinary Policy and Procedure for employees or the Student Code of Conduct for research students.
- 50 Concerns about research misconduct by students on taught programmes will normally be dealt with in line with the Student Code of Conduct.

- 51 Any complaints or cases of research misconduct will be documented in the annual report of the UEP, received by the Research and Enterprise Committee.
- 52 Any allegations of research misconduct on research projects, which could reasonably be considered as directly or indirectly supported by Research England funding, should be promptly reported by the secretary of the UEP to Research England at researchintegrity@re.ukri.org, as well as the outcome of any formal investigation by the University. Any other funding bodies or sponsors of the research should also be informed.

Responsibilities

- 53 All researchers should ensure they are familiar with research ethics codes relevant to their discipline or field and are responsible for the ethical design and conduct of their research.
- 54 All research employees at the University, and especially its research leaders, including the Director of Enterprise and Research, the Head of Graduate School, all research professors and associate professors, and the chair and representatives of the UEP, are responsible for cultivating ethical consciousness and a culture of ethical practice among all employees and students.
- 55 Principal investigators are responsible for deciding if ethical review is required for their proposed research project and for seeking advice when needed.
- 56 Principal investigators are responsible for deciding if ethical review from an outside body (e.g. the HRA or MoDREC) is required for their proposed research project and for seeking advice when needed.
- 57 All representatives of the UEP are obliged to provide ethical guidance to researchers on request and provide reasonable support for applicants to the UEP pre- and post-review.
- 58 Academic Schools are responsible for ensuring all students on taught programmes engaging in research are overseen by an ethics subcommittee. Subcommittees are autonomous and will produce an annual report for the UEP.
- 59 Representatives of the UEP will monitor and review the University's research ethics policy, guidelines, and procedures in light of the external ethics environment and legal and regulatory considerations and propose changes as required to the Research and Enterprise Committee.
- 60 Representatives of the UEP must undergo research ethics training and should engage in regular training and development.

Table of Definitions

Research	The systematic process of investigation leading to new insights, which are shared with the academic <i>and</i> other relevant audiences.
Inclusive research	Research that seeks to remove barriers to participation and/or ensure all cultural groups have a voice in and through the research. Inclusive researchers conduct studies <i>with</i> , rather than <i>about</i> , the people or cultures at the centre of the research problem.
Liberatory research	Transformational research that seeks to challenge dominant logic or paradigms, which are complicit in oppressive, discriminatory, or inequitable treatment of people, groups, or cultures.
Non-maleficence	The principle of doing no harm to people (including physical, emotional, professional, and social harm), cultures, or the environment. Where the risk of harm is identified, this must be weighed against the potential benefits of the research and mitigated as much as possible.
Beneficence	The principle of ensuring research brings the most benefit to the largest number of people.
Informed consent	The consent of participants to be researched and to the processing of their personal data and research data based on full disclosure by the researcher.
Voluntariness	The principle that informed consent must be achieved by the will of the participant and not through coercion, force, or deception. In rare cases where some level of deception is required in order to maintain the legitimacy of research data, participants must voluntarily (re)consent once the deception has been revealed.
Vulnerability	The consideration of people or groups who may be at additional risk of harm through the research and/or may lack the capacity or autonomy to provide voluntary informed consent.
Confidentiality	The obligation of all researchers to protect the personal data/information of research participants, usually by way of safe storage and processing of those data.
Anonymity/anonymisation	Anonymity is a form of confidentiality in which the identity of the participant is not known. Anonymisation refers to the process the researcher follows to remove any personal

	data/information, or any other markers of a participant's identity, from research outputs.
Personal data	Information about a participant that might allow them to be identified. This may include direct identifiers, such as names, addresses, contact details, images, or any combination of indirect identifiers, such as gender, ethnicity, nationality, age, which collectively identify an individual.
Research data	Information provided by the participant, which addresses the research objectives.
Research misconduct	Any activities or behaviours of a researcher, which contravene this research ethics policy, the Concordat to Support Research Integrity , or any other relevant ethical codes of practice.
Principal investigator	The lead researcher on a project. Generally, the main holder of research funding or institutional lead for a collaborative project.

Appendix: Equality Impact Assessment

1. What is changing and why?

The University Research Ethics Panel (UEP) monitors the external ethics environment and legal and regulatory considerations to propose changes to the policy, guidelines, and procedures as required. In line with the sector, the Policy has been abbreviated to the key principles for better accessibility and to better represent the flexible and disputable nature of research ethics. A second, more detailed document, which provides guidance on more specific areas of research ethics has been created to support the Policy document and help researchers to put together successful ethics applications and conduct more ethical research. Updated or added information to the latest policy and/or guidelines includes:

- Clarification about the rights of young people and adults with cognitive impairments or learning difficulties to consent to their participation in research.
- Additional focus on the ethical use of animals in research.
- Further guidance around the use of emerging technologies, including Microsoft Teams and similar platforms, and social media, for research purposes.
- Insertion of the need to engage in inclusive and liberatory approaches to research as an ethical principle.
- Greater emphasis on the need to respect and preserve any cultures that are the subject or site of research as an ethical principle.
- Further clarity about risks to the researcher/research team and how to mitigate these.
- Further emphasis on the procedures for receiving and investigating complaints about research, or accusations of research misconduct.

2. What do you know?

A working group of diverse membership was established, on a voluntary basis, from the wider UEP members to review the research ethics policy and supporting documents. While an audit of the UEP processes, using the [UKRIO audit tool](#), revealed no significant gaps or issues, the working group members raised a number of their own concerns about the policy and guidelines' non-coverage, limited coverage, or ambiguous coverage of the issues noted above (Section 1 of this form). This review also coincided with the development of BNU's Inclusive Research and Knowledge Exchange strategy, which has since been ratified by the University Research and Enterprise Committee and Senate, as well as the development of the [UK Funding Councils EDI Strategies and Action Plans](#) and the [UK Government's Guide to Inclusive Social Research Practices](#). While none of these sources were specifically focused on research ethics, they reaffirmed the need for ethics policies and processes to encourage and affect inclusive and liberatory approaches to research and further protect and give a voice to underrepresented groups, vulnerable people, and other overlooked stakeholders in the research process.

3. Assessing the impact				
	Could benefit	May adversely impact	What does this mean? Impacts identified from what you know (actual and potential)	What can you do? Actions (or why no action is possible) to advance equality of opportunity, eliminate discrimination, and foster good relations
a) How could this affect different ethnicities? <i>Including Gypsy, Roma, Traveller, Showmen and Boaters, migrants, refugees and asylum seekers.</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>UEP maintains a diverse membership from across the University and global ethnic majority staff are encouraged to join UEP. This ensures that BNU can continue to maintain focus on the research participants' (and other stakeholders') experience from different ethnicities, and amplify the voices of different ethnic groups.</p> <p>The research ethics policy states the need to engage in inclusive and liberatory approaches to research where this is at all possible and appropriate. This includes conducting research <i>with</i>, as opposed to <i>on</i> or <i>for</i>, different ethnicities. It further emphasises, as a key principle of ethical research practice, the requirement to respect and protect different cultures.</p>	<p>The UEP, and the academic Schools, can continue to encourage global ethnic majority membership of UEP.</p> <p>UEP, through its review processes, can encourage researchers to follow the principles of inclusive research by, for instance, consultation and co-design of research with global ethnic majority communities, and equitable sampling strategies and reporting, which fully represent different ethnicities, their experiences and perspectives.</p> <p>UEP can also steer researchers to useful tools for inclusive research design, such as the UK Government's Guide to Inclusive Research Practices.</p>
b) How could this affect cisgender and transgender men and women (including maternity/pregnancy impact), as well as non-binary people?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>UEP maintains a gender diverse membership and <i>all</i> staff are encouraged to join UEP to ensure that we can focus on the research participants' (and other stakeholders') experience, and amplify the voices of different gender identities.</p> <p>The inclusion of liberatory approaches to research as an ethical principle emphasises the</p>	<p>UEP, along with other research bodies within BNU, such as the Research and Enterprise Committee, can encourage researchers to pursue impactful, liberatory research. Further, and relatedly, we can encourage researchers to follow the principles of inclusive research by, for instance consultation and co-design of research with LGBTQ+ groups, and equitable sampling strategies and reporting, which fully represent</p>

			importance of engaging in research, which might set women and LGBTQ+ people free from the social, political, and economic constraints that hinder their development and quality of life.	different genders, their experiences and perspectives. UEP can also steer researchers to useful tools for inclusive research design, such as the UK Government's Guide to Inclusive Research Practices .
c) How could this affect disabled people or carers? <i>Including neurodiversity, invisible disabilities and mental health conditions.</i>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Full consideration of vulnerable groups, including people with disabilities that might put them at greater risk of harm from research, is required in the research ethics application process. Neurodivergent people may find the research ethics application process more challenging.	UEP can provide additional support for neurodivergent applicants, providing the time and advice of Panel leads as well as additional time to complete documents if needed.
d) How could this affect people from different faith groups?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The research ethics policy places emphasis on the need to respect and preserve any cultures or faiths that are the subject or site of research as an ethical principle.	UEP can further ensure that researchers employ the University's definitions of antisemitism and islamophobia and challenge these through liberatory research where applicable.
e) How could this affect people with different sexual orientations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The inclusion of liberatory approaches to research as an ethical principle emphasises the importance of engaging in research, which might set LGBTQ+ communities free from the social, political, and economic constraints that hinder their development and quality of life.	UEP, along with other research bodies within BNU, such as the Research and Enterprise Committee, can encourage researchers to pursue impactful, liberatory research. Further, and relatedly, we can encourage researchers to follow the principles of inclusive research by, for instance, consultation and co-design of research with LGBTQ+ groups, and equitable sampling strategies and reporting, which fully represent different genders, their experiences and perspectives.

				UEP can also steer researchers to useful tools for inclusive research design, such as the UK Government's Guide to Inclusive Research Practices
f) How could this affect different age groups or generations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>The rights to self-determination for young people and children receive more attention in the ethics guidelines, specifically the need to ensure their consent to participate in research using age-appropriate information.</p> <p>Older people, while not necessarily vulnerable, are considered to be potentially more at risk from certain research interventions. UEP places emphasis on the need to treat older people with respect and take into account some of the difficulties that might come with age.</p>	UEP can encourage researchers to use age-appropriate participant recruitment materials in their research and to identify potentially vulnerable participants.
g) How could this affect those who are married or in a civil partnership?	<input type="checkbox"/>	<input type="checkbox"/>	Nothing identified.	Nothing identified.
h) How could this affect people from different backgrounds such as: socio-economic disadvantage, homeless, alcohol and/or substance misuse, people experiencing domestic and/or sexual violence, ex-armed forces, looked after children and care leavers.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>The inclusion of liberatory approaches to research as an ethical principle emphasises the importance of engaging in research, which might set different communities free from the social, political, and economic constraints that hinder their development and quality of life.</p> <p>Full consideration of vulnerable groups, or people that may be at greater risk of harm from research, is required in the research ethics application process.</p>	UEP can encourage researchers make appropriate referrals during or post-research intervention.

i) How could this affect people with multiple intersectional experiences?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The inclusion, as an ethical principle, of the need to engage in inclusive and liberatory approaches to research will safeguard the rights and freedoms of <i>all</i> stakeholders in research.	<p>UEP, along with other research bodies within BNU, such as the Research and Enterprise Committee, can encourage researchers to pursue impactful, liberatory research. Further, and relatedly, we can encourage researchers to follow the principles of inclusive research by, for instance, consultation and co-design of research with different groups, and equitable sampling strategies and reporting, which fully represent a diverse population, their experiences and perspectives.</p> <p>UEP can also steer researchers to useful tools for inclusive research design, such as the UK Government's Guide to Inclusive Research Practices.</p>
4. Overall outcome				
No major change needed <input checked="" type="checkbox"/>	Adjust approach <input type="checkbox"/>	Adverse impact but continue <input type="checkbox"/>	Stop and remove <input type="checkbox"/>	
5. Details of further actions needed				
Nothing specific identified but UEP has the responsibility to continue monitoring the external ethics environment, EDI, and the legal and regulatory considerations to propose changes to the policy, guidelines, and procedures as required.				
6. Arrangements for delivery and future monitoring				
The new ethics policy and guidelines will be promoted to all academic employees via a BEN story and information exchanges and workshops, run by the chair of UEP, will be updated and continue to be delivered across academic Schools.				
7. Completed by:	Ben Clayton	Chair of University Research Ethics Panel	Date	18/03/2024
8. Signed off by:	Florin Ioras	Director of Research and Enterprise	Date	15/03/2024



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