Ethics Policy

A. Introduction

1. The integrity of any research depends not only on its rigour, but also on its ethical adequacy. Ethical issues are many and varied; and may be quite complex. Research involving human participants is undertaken by many different disciplines and conducted in a broad range of settings and institutions. While some issues are specific to particular professional groups, all research should be guided by a set of fundamental ethical principles to ensure the protection of human participants.

2. This policy complies with Kingston University's Ethics Policies. It upholds the principles of the Concordat to Support Research Integrity, ensuring that all research conducted is **honest**, **transparent** and **in the public interest**. This framework provides clear guidelines for maintaining ethical research practices. The Concordat sets out five commitments to which we ascribe:
   - We are committed to maintaining the highest standards of rigour and integrity in all aspects of research.
   - We are committed to ensuring that research is conducted according to appropriate ethical and legal and professional frameworks, obligations and standards.
   - We are committed to supporting a research environment that is underpinned by a culture of integrity and based on good governance, best practice and support for the development of researchers.
   - We are committed to using transparent, robust and fair processes to deal with allegations of research misconduct should they arise.

3. Underpinning these commitments are the ethical standards of DO NO HARM (no malfeasance) and DO GOOD (beneficence). The five overarching principles of research ethics CCL adheres to, are:
   - PRINCIPLE ONE: Minimising the risk of harm
   - PRINCIPLE TWO: Obtaining informed consent
   - PRINCIPLE THREE: Protecting anonymity and confidentiality
   - PRINCIPLE FOUR: Avoiding deceptive practices
   - PRINCIPLE FIVE: Providing the right to withdraw

4. Risks and benefits need to be weighed up by researchers, bearing in mind that risk is related to scientific rigour and the quality of research. In medical research physically invasive procedures are easily defined. However, what constitutes risk in social research is sometimes less clear cut. Questionnaires, observation and interviews can all be potentially intrusive and provoke anxiety in participants, or worse, involve psychological risk.

5. **It is the responsibility of staff and students supervising/undertaking research to familiarise themselves and comply with this policy.** In the case of student-led research, it is the responsibility of PDEs to make students aware of the policy and relevant research ethics.

6. This policy should be read in conjunction with:
   - Kingston University's Ethics Policies
   - Safeguarding Policy
   - Student Complaints Procedure
   - Code of Practice for Freedom of Speech
   - Student Conduct Procedure

7. The Code of Practice for Research and the Recommended Document for Researchers from the UK Research Integrity Office summarise key points of promoting good practice in research and these resources are advised to students.

B. Scope of the Policy

8. This policy applies to all higher education programmes delivered by Corndel College London leading to either a Corndel College London Award or a Kingston University Award.

9. All research activities, when involving human participants, or data on humans, require ethical review. This is overseen by CCL's Ethics Panel. This policy applies to research project modules which are normally at level 6. For the purpose of this policy, we define these activities as:

   Activities undertaken in the creation of a knowledge-based artefact, usually articulated in, but not restricted to, a written format. Practical activities involving human subjects or participants may form part of the Research Project. This involvement may range from simple surveys and audience questionnaires to experimental processes. However, the decision to involve third parties in the project is predicated on the contribution of the participants to the research. In short, the activity is instrumental to the research outcome/goal. Furthermore, the activity would not take place (or would take place in a markedly different way) if the Research Project did not exist.

C. Standards

10. The following standards have been developed to guide staff and students undertaking research involving human participants and/or data. They are intended to cover the five general principles outlined above, but they may not address all situations, and the researcher should seek further advice as appropriate.

    a. No research should cause harm, and preferably it should benefit participants. Research should not cause emotional, professional, or reputational harm to

anyone involved, including participants, the organisation or company, or the student. For example (the list below does not limit right to freedom of speech and academic freedom which is balanced against other legal rights such as freedom for harassment and discrimination. For more information please refer to the Code of Practice for Freedom of Speech):

- Don't ask overly intrusive questions
- Don't criticise individuals or departments by name
- Avoid creating conflict in the workplace through your research

b. Potential participants normally have the right to receive clearly communicated information from the researcher in advance

c. Participants should be free from coercion of any kind and should not be pressured to participate in a study. Offering incentives to encourage participation in research (e.g. raffles, gift cards) is not automatically considered coercion, but it does raise important ethical considerations. Coercion occurs when a participant feels they have no real choice but to participate often due to threats, pressure, or undue influence. The key issue is whether the incentive compromises the participant's ability to make a voluntary and informed decision.

d. Participants in a research study have the right to give their informed consent before participating. Participants' right to withdraw from the study should be made explicit.

e. Where third parties are affected by the research, informal consent should be obtained

f. The consent of vulnerable participants or their representatives' consent should be actively sought by researchers. A vulnerable participant is someone who may have diminished autonomy, limited capacity to understand information, or increased susceptibility to coercion or undue influence. Vulnerability refers to a condition or set of circumstances that may limit a person's ability to freely give informed consent or to protect their own interests during participation in research. Vulnerable individuals or groups may be at increased risk of coercion, exploitation, or harm due to personal, social, or institutional factors.

g. Honesty should be central to the relationship between researcher, participant and institutional representatives. Students should be transparent about:
   - How data was collected
   - Any limitations or biases in their research

   They must not:
   - Falsify data
   - Misrepresent findings
   - Hide information that contradicts their argument

h. Conflicts of interest should be anticipated and managed. A conflict of interest may arise where financial, personal or other considerations could affect research data, conduct, and judgement.

i. Participants' confidentiality and anonymity should be maintained

j. The collection and storage of research data by researchers must comply with the General Data Protection Regulation (GDPR) 2018

k. Undertaking security-sensitive research should be carefully considered and must comply with the Prevent Duty and the Counterterrorism and Security Act (2015)

l. Researchers have a duty to disseminate their research findings to all appropriate parties. This refers to all individuals, groups, or organizations that have a legitimate interest in or could benefit from the research findings. (Details of disseminating the results of the work should be clarified prior to undertaking the research.)

m. Researchers must adhere to the requirements of CCL's Code of Practice fpr Freedom of Speech.

D. Data Ethics and Security

11. Research data management is the safe and effective care of information generated during the research process. Research data management will help collate data that underpins the work in a way that allows it to be used with confidence, both now and in the future.

12. The collection and storage of research data must comply with the General Data Protection Regulation (GDPR) 2018. Anyone responsible for using personal data must make sure the information is:
    - used fairly, lawfully and transparently
    - used for specified, explicit purposes
    - used in a way that is adequate, relevant and limited to only what is necessary
    - accurate and, where necessary, kept up to date
    - kept for no longer than is necessary
    - handled in a way that ensures appropriate security, including protection against unlawful or unauthorised processing, access, loss, destruction or damage

Employer Data

13. When considering each project topic, students should ensure that they have buy-in from their employer to ensure they are able to investigate, research and explore their selected topic in detail.

14. Commercially sensitive material should be considered at project inception by the student with their employer. Similarly, project proposals should be examined for potential conflicts with policies of the employer organisation. **This includes where employer data is fed into any third-party service, including AI/LLM tools. It is the student's responsibility to verify this does not constitute a data breach.**

15. A good general approach might be to have the project signed off by the respective employer stakeholders, e.g., data privacy officer, legal department, and apprentice mentor and manager; especially where clear rules have not been formulated, or protected organisational assets have not been identified explicitly.

16. **It is the student's responsibility during project inception to consult their organisation/employer's relevant policies and procedures and verify that any research project they undertake aligns with ethical practices and data collection and storage management. By embarking on the research project, the student confirms their employer's approval.**

E. Secondary Data Analysis

17. Secondary data analysis in the context of research ethics refers to the use of data that was originally collected for a different purpose, often by someone other than the current researcher, for a new research question or project.

18. The same standards apply for secondary data analysis, yet there are some specific principles the researcher should verify and keep in mind, for instance:
    - Researchers must determine whether the original participants gave consent for their data to be reused. If the data was collected with broad consent for future research, secondary use may be ethically permissible.
    - Even anonymised data can sometimes be re-identified, especially when combined with other datasets.
    - Researchers must respect the terms under which the data was shared, including any licensing or usage restrictions. Attribution to the original data collectors is essential.
    - Even though the data is pre-existing, many institutions still require Ethics Committee approval for secondary data analysis. It must be ensured that the new use of the data aligns with ethical standards.
    - The new research should aim to benefit society or contribute to knowledge without harming the original participants. Researchers should avoid using data in ways that could stigmatise or disadvantage individuals or groups.

19. Students are advised to consider the ethical implications of using sources like blogs, social media, and other open-source secondary data. Student will need to justify its usage, and verify the data is allowed to be used for their purpose.

Use of Internal (Workplace) Data

20. Internal company data (e.g. HR data, performance stats, financial data, feedback reports) is usually considered secondary data unless the student collected it specifically for their project. **Permission must be obtained from the company to use this data for academic purposes.**

21. Students must:
    - Anonymise sensitive data (e.g. names, job titles, departments)
    - Avoid sharing anything that breaches confidentiality, NDAs, or data protection policies
    - Use only what's necessary and relevant to the project
    - Consider the original terms of use of the data
    - Consider whether client data being used in a way that deviates from the original agreement

F. Safeguarding and Code of Conduct for Freedom of Speech

22. In line with our Code of Practice for Freedom of Speech, academic freedom and freedom of speech should be upheld at every opportunity and should only be limited where it is legal to do so.

23. Safeguarding and Prevent Policy
    Safeguarding is about helping to protect adults and children, including those who are vulnerable, from abuse and neglect. This includes equipping people to protect themselves from the risk of radicalisation and adopting a zero-tolerance approach to bullying and/or harassment.

24. All research must uphold the highest standards of safeguarding, ensuring the welfare and protection of children, young people, and vulnerable adults involved directly or indirectly in research activities. Researchers must remain vigilant to potential risks of harm, exploitation, or abuse, and are required to follow institutional safeguarding procedures, including prompt reporting of concerns. In line with the UK Government's Prevent Duty, researchers must also be alert to the risk of radicalisation and ensure that research environments do not facilitate extremist ideologies. Ethical review processes will assess projects for compliance with safeguarding and Prevent responsibilities.

G. Process

25. Students will need to consider the ethical implications of their project and ensure they meet the standards set in section C of this policy. It is important that students discuss their ideas early to facilitate the smooth navigation through the applicable ethical approval process.

26. The Research Ethics Checklist (see Appendix A) should be completed for every research project. Especially projects that involve human participants/data and when one or more of the criteria below are present:

a) the project has the potential to offend or harm any human participants involved in the project;
b) when a programme cannot resolve or agree on an ethical issue that has arisen;
c) if the CCL student and/or advisor associated with the project deems that there is a potential ethical issue;
d) when the material might be linked, or interpreted as linked, to terrorism/matters that the Prevent duty is concerned with.

27. This checklist is used to identify issues that need to be considered for ethical approval by the Ethics Panel. The checklist must be completed before potential participants are approached to take part in any research.

28. If in completing the checklist you have answered **NO** to all of the declarations, then the PDE may authorise the project to be initiated. The checklist needs to be filed alongside the final submitted module assessment.

29. If in completing the checklist you have answered **YES** to any of the declarations, then further information needs to be provided as required in section 4 of the form. The forms should be presented for review to the PDE, who will then escalate to the Academic Registrar (or nominee).
    - Where, upon review, the Academic Registrar (or nominee) is satisfied that any ethical issues have been appropriately managed, it is in their discretion to approve the project.
    - Where the Academic Registrar (or nominee) is concerned about any ethical issues, they will request for a meeting of the Ethics Panel to be convened to consider the proposed research. The Ethics Panel will be convened within ten CCL working days of receiving notification of the issue. The PDE and the student will be informed of the outcome ASAP and within five CCL working days of the meeting of the Ethics Panel. The Panel will convene on an ad-hoc basis as is necessary.

30. The Ethics Panel will consist of three members: the relevant PDE, Delivery Director, and Academic Module Lead. If either of the latter serves as the PDE, then an additional, independent, PDE will be included.

31. The Panel may either meet virtually or be consulted (and agree on their outcome) electronically. If needed, the panel may invite an external with the required professional or academic expertise.

32. Any member of CCL who believes that there may have been a breach of research integrity should refer the matter to the Academic Registrar. CCL will invoke its staff and/or student disciplinary procedures in relation to alleged breaches of research integrity.

33. Examples of such breaches include:
    - Misappropriation of another's intellectual property by plagiarism or breach of confidence

- Theft or damage of another's research-related property
- Misrepresentation of research findings by deception or lying
- Obstruction, including withholding, destroying or falsifying evidence
- Unfairly influencing witnesses or interviewees
- Breach of confidentiality required by external contracts
- Deliberate commercial exploitation of ideas without acknowledgement / informed consent
- Failing to comply with statutory or institutional regulations, including ethical review

H. Student Support

34. Corndel College London is committed to providing a supportive and inclusive environment that enables all students to reach their academic potential and successfully meet the requirements of their programme.

35. Our aim is to promote and support positive mental health and wellbeing throughout the student journey. Students experiencing mental health challenges are encouraged to seek support as early as possible. Students can speak to their PDE at any time if they are struggling with their wellbeing or mental health. PDEs are trained to listen, provide initial support, and help signpost students to appropriate services.

36. In addition, students can access Qwell, a free, confidential online counselling and emotional wellbeing service, available 24/7. Qwell offers access to qualified counsellors, peer support communities, and self-help tools, and can be used without a referral. It is a valuable resource for students who may prefer to seek help outside of regular working hours or in a private setting.

I. Reporting and Monitoring

37. The Ethics Panel will report to the Academic Board and will keep a summary record of casework, and an overview of decisions reached. Annual reports will show trends and make recommendations for improvements to this policy and procedure where necessary.

Version Control	
Document Title	Ethics Policy
Maintained By	Assistant Registrar (Quality)
Owned By	Academic Registrar
Ratifying Committee	Academic Board
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Current Version	Version 1.1

APPENDIX A

<u>Research Ethics Checklist</u> *(Qualtrics/MS Form link to follow)*
This checklist should be completed for every practical research project. Especially those that involve human participants and when one or more of the criteria below are present:

1. the project has the potential to offend or harm any human participants involved in the project;
2. when a programme cannot resolve or agree on an ethical issue that has arisen;
3. if the CCL student and/or advisor associated with the project deems that there is a potential ethical issue;
4. when the material might be linked, or interpreted as linked, to terrorism/matters that the Prevent duty is concerned with.

It is used to identify issues that may need to be considered for ethical approval by the CCL Ethics Panel.

This checklist must be completed before potential participants are approached to take part in any research.

Section 1: Student Details

Name of Student	
Programme	
Module name and number	
PDE	

Section 2: Project Summary and Title

Project Title	Project Summary

Section 3: Declaration by Student (Please tick the appropriate boxes)

☐	I have read the CCL Ethics Policy
☐	The topic merits further research
☐	I have the skills to carry out the research
☐	I have a procedure for recruitment and obtaining informed consent

☐	The research is exempt from additional ethics review from an organisation/s outside of CCL (i.e. employer, NHS etc.)

Research Declaration Checklist

Please answer each question by ticking the appropriate box:

	Yes	**No**
Will the study involve participants who are particularly vulnerable or who may be unable to give informed consent (e.g. children, people with learning difficulties and/or some mental health difficulties and/or problems with understanding/communication)?	☐	☐
Could a conflict of interest arise that is not permissible?	☐	☐
Will deception be necessary i.e. will participants take part without knowing the true purpose of the study or without their knowledge /consent at the time (e.g. covert observation of people in non-public places)?	☐	☐
Will the study involve discussion of topics which the participants may find sensitive?	☐	☐
Could the study induce psychological stress, anxiety, cause harm, or negative consequences beyond the risks encountered in normal life?	☐	☐
Will the study involve unusually prolonged or repetitive testing?	☐	☐
Will participants' right to withdraw from the study at any time be withheld or not made explicit?	☐	☐
Will participants' anonymity be compromised or their right to anonymity be withheld or information they give be identifiable as theirs?	☐	☐
Has the employer been consulted and permission obtained where necessary, on using and disclosing primary and/or secondary data sets? Has the project been verified to align with all relevant employer policies and procedures? (It is advised to add the relevant company clause and/or acknowledgement of consent to the project work.)	☐	☐
Will research data be collected and stored complying with the General Data Protection Regulation?	☐	☐

If all items in the Research Declaration Checklist are ticked and if you have answered NO to ALL questions send the completed form to the PDE for information. You may proceed with the research but should follow any subsequent guidance from

your PDE. A copy of this form should be retained and submitted with the research submission.

If any of the items in the Research Declaration Checklist are not ticked AND/OR if you have answered YES to ANY of the questions you will need to describe more fully in section 4 of this form how you plan to deal with the ethical issues raised by your research.

This does not mean that you cannot do the research, only that your proposal will need to be approved by the Academic Registrar, or if the Academic Registrar is concerned with any issue, the CCL Ethics Panel.

Section 4: Addressing Ethical Issues/Problems

If any of the items in the Research Declaration Checklist are not ticked AND/OR if you have answered YES to ANY of the questions you will need to describe more fully in this section how you plan to deal with the ethical issues raised by your research.

Summary of issue	Action to be taken to address the ethics problem/s

Signed: Student
Date:

Signed: PDE
Date:

For completion by the Academic Registrar:

Please tick the appropriate box/boxes:

The ethical problems raised in this study do not require any additional consideration	☐

Appropriate action/s taken to maintain ethical standards	☐
The research protocol should be revised to eliminate the ethical concerns or reduce these to an acceptable level using the attached suggestions	☐
There are ethical problems that need to be referred to the Ethics Panel for further consideration	☐

Signed:
Date:

Copy of this page to be returned to the student

For completion by the Chair of the Ethics Panel:

Please tick the appropriate box/boxes:

Appropriate action/s taken to maintain ethical standards – Research is approved.	☐
The research protocol should be revised to eliminate the ethical concerns or reduce these to an acceptable level using the attached suggestions	☐
There are ethical problems that cannot be resolved – the Research Project should not go ahead.	☐

Signed:
Date:

Copy of this page to be returned to the student