Research Ethics Policy

Classification – *Public*

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Contents

1. Purpose of the Policy

Arden University is committed to ensuring that all research undertaken under its name, or involving its staff, students, or data, is conducted in a rigorous, ethical, and responsible manner.

The purpose of this policy is to:

- set out Arden University's framework for ethical research practice;
- ensure that potential ethical risks to participants, researchers, partner organisations, and the University are identified and appropriately managed;
- support staff and students to conduct research that meets legal, professional, and sector standards;
- protect the rights, dignity, wellbeing, and interests of research participants; and
- safeguard the integrity and reputation of Arden University.

This policy is informed by the Seven Principles of Public Life (the Nolan Principles), which underpin ethical decision-making, transparency, accountability and leadership in public institutions. These principles support the University's commitment to proportionate, fair and responsible ethical review across the research lifecycle.

In applying this policy, Arden University recognises and upholds freedom of speech and academic freedom within the law, in accordance with the University's Freedom of Speech Code of Practice. Ethical review is intended to enable responsible research and safeguard participants, not to restrict lawful inquiry, debate or the expression of academic viewpoints, including those that may be contested or unpopular.

This policy forms part of Arden University's Research Governance Framework and should be read in conjunction with the Research Integrity Policy and Research Publications Policy. Together, these policies provide a coherent framework governing the conduct, approval, safeguarding and dissemination of research undertaken in the University's name.

Ethical consideration is an ongoing responsibility throughout the research lifecycle and does not end once approval has been granted.

2. Ethical Principles and Standards

All research conducted at, by, or in the name of Arden University must adhere to the following ethical principles, in line with the University's Research Governance Framework:

- **Integrity and honesty** – conducting research honestly, responsibly, and openly.
- **Respect and dignity** – recognising the autonomy, rights, values, and diversity of participants.
- **Minimisation of harm and Safeguarding** – identifying foreseeable risks of physical, psychological, social, legal, or reputational harm and responding appropriately.
- **Objectivity and Proportionality** – ensuring that ethical safeguards and review processes are appropriate to the level of risk involved.
- **Informed and voluntary participation** – ensuring participants are provided with clear, accessible information and are free to decline or withdraw without disadvantage.
- **Accountability** – accepting responsibility for ethical decision-making and research outcomes.

This policy is informed by recognised sector frameworks, including the **Concordat to Support Research Integrity** and guidance issued by the **UK Research Integrity Office (UKRIO)**. Ethical review decisions will therefore not be based on the viewpoint, topic, or anticipated findings of the research, but on ethical risk, safeguarding considerations, and legal compliance.

3. Scope of the Policy

3.1. Who the Policy Applies To

This policy applies to:

- all Arden University staff conducting research;
- all students undertaking research as part of their studies;
- visiting, honorary, adjunct, and other Arden affiliated researchers;
- research conducted in collaboration with external partners where Arden University is named or data is used.

A member of Arden University staff will normally act as the Principal Investigator (PI) and hold overall responsibility for ethical compliance.

3.2. Activities Requiring Ethical Approval

Ethical approval is required for academic or scholarly research, including applied research activity, where the purpose is to:

- generate new or generalisable knowledge; and/or
- disseminate findings beyond internal institutional use (e.g. publication, conference presentation, public reporting).

This includes, but is not limited to:

- empirical research involving human participants;
- research using identifiable or sensitive personal data;
- scholarship of teaching and learning intended for external dissemination;
- applied and professional research involving external stakeholders.

Ethical approval must be obtained before participant recruitment or data collection begins, and retrospective ethical approval is not supported.

3.3. Activities Not Requiring Ethical Approval

Formal ethical approval is not required for:

- internal audits;
- service evaluations;
- quality assurance and enhancement activity;
- routine monitoring, evaluation, and institutional analytics;
- statutory and regulatory reporting (e.g. HESA, OfS).

These activities are undertaken for internal operational, quality, or regulatory purposes and do not normally seek to generate generalisable research outputs.

While ethical approval is not required, all such activity must be conducted in line with ethical best practice, including respect for participants, transparency of purpose, and compliance with data protection and information governance requirements.

Where an activity subsequently develops into academic or scholarly research, ethical approval must be sought before that transition occurs.

Further guidance on applying ethical best practice to audits and service evaluations is provided in the **Ethical Best Practice for Audits & Service Evaluation** guidance document.

4. Definitions

For the purposes of this policy, key terms are defined in the Arden Research Ethics Glossary, including but not limited to:

- Research
- Academic / Scholarly Research
- Applied Research
- Audit
- Service Evaluation
- Informed Consent
- Vulnerable Participants
- Ethical Approval

The glossary forms an integral part of this policy and should be used to support consistent interpretation and decision-making.

5. Governance and Institutional Responsibilities

5.1. Institutional Oversight

Overall responsibility for research ethics governance rests with Arden University Research Committee, which provides strategic oversight and assurance.

The Research Ethics Committee (REC) is responsible for the independent ethical review of high-risk research and for advising on complex or contentious ethical issues.

5.2. Roles and Responsibilities

Ethical responsibility is shared across the institution:

- Principal Investigators are responsible for ensuring ethical compliance throughout the research lifecycle.

- Supervisors are responsible for supporting student researchers to identify and address ethical issues.
- Ethics Integrity Officers (EIO) undertake delegated ethical review for low- and medium-risk research.
- The Research Ethics Committee reviews high-risk research and may impose conditions, require amendments, or decline approval.

5.3. Authority to Suspend or Withdraw Approval

Arden University reserves the right to suspend or withdraw ethical approval where:

- substantive ethical concerns arise;
- approved conditions are not met; or
- new information materially alters the ethical risk profile.

6. Ethical Risk Framework

Arden University adopts a risk-based and proportionate approach to ethical review.

Ethical risk refers to the potential for harm to participants, researchers, or the institution, including physical, psychological, social, legal, or reputational harm.

Research proposals are classified into the following categories:

- **Low / Medium-Risk Research**
- **High-Risk Research**
- **Impermissible Research**

Risk classification is determined by the nature of the participants, data, methods, and context, and by the extent to which risks can be effectively mitigated.

Arden University's defined criteria risk criteria and examples are set out in **Appendix A**.

7. Requirement for Ethical Approval

Ethical approval must be obtained prior to:

- recruitment of participants;
- collection or access to research data; or

- commencement of research activity involving ethical risk.

Approval is conditional, time-limited, and subject to ongoing compliance. Material changes to an approved project require further ethical review via the Amendments process outlined in **Appendix B**.

Ethical approval does not replace the need to obtain other required permissions, including legal, contractual, safeguarding, or organisational approvals.

Ethical approval can not be granted retrospectively.

8. Ethics Approval Pathways

Ethical review is undertaken through defined approval pathways, proportionate to risk and appropriate to the type of research being conducted. Risk classification is determined using University-approved criteria (see Appendix A). Delegated review is undertaken only by authorised, trained reviewers.

8.1. Student Research Projects

Student research is subject to ethical review where it meets the definition of research under this policy.

- Projects identified as Low / Medium-Risk may be approved through delegated review, following supervisor endorsement.
- Projects identified as High-Risk must be reviewed and approved by the Research Ethics Committee.
- Research classified as Impermissible will not be approved.

8.2. Staff Research Projects

All staff research proposals must undergo ethical consideration.

- Low / Medium-Risk staff research may be approved through delegated review.
- High-Risk staff research must be referred to the Research Ethics Committee for review and decision.

Line management or Head of School approval may also be required in accordance with institutional procedures.

8.3. Group-Based Research Projects

Where a single research design is delivered repeatedly across a cohort (e.g. group supervision):

- ethical approval should be granted at project level;
- student activities must operate within the approved parameters;
- material deviations from the approved design require further ethical review.

8.4. Impermissible Research

Research will not be approved where it:

- violates legal, professional, or regulatory requirements;
- presents unmitigated or disproportionate ethical risk;
- lacks meaningful informed consent;
- falls outside the competence of the researcher; or
- would bring Arden University into disrepute.

9. Ethical Use of Artificial Intelligence in Research

Arden University recognises that artificial intelligence (AI) tools and systems are increasingly used across the research lifecycle, including in research design, data collection, data analysis, interpretation, and dissemination.

The use of AI in research does not remove or reduce the ethical responsibilities of researchers. Researchers remain fully accountable for the integrity, validity, and ethical conduct of their work, regardless of whether AI tools are used.

9.1. Principles for the Ethical Use of AI

Where AI tools or systems are used in research, researchers must ensure that their use is consistent with the ethical principles set out in this policy, including:

- Transparency – the use of AI must be disclosed where it materially influences research design, analysis, interpretation, or outputs.
- Accountability – responsibility for research decisions, conclusions, and outcomes remains with the researcher.

- Fairness and bias awareness – researchers must consider and mitigate the potential for bias, exclusion, or distortion arising from AI systems or training data.
- Data protection and confidentiality – AI use must comply with data protection legislation and institutional information governance requirements.
- Respect for participants – AI must not be used in ways that undermine informed consent, participant autonomy, or dignity.

9.2. AI and Ethical Risk

The use of AI may introduce additional ethical risks, including but not limited to:

- opaque or non-explainable decision-making;
- inappropriate use of personal or sensitive data;
- automation of analysis without adequate human oversight;
- reinforcement of existing inequalities or biases;
- misrepresentation of authorship or intellectual contribution.

These risks must be identified and addressed as part of ethical risk assessment and mitigation.

9.3. Disclosure and Review

Researchers are required to declare the use of AI tools where such use is relevant to ethical review, including where AI is used:

- to generate, analyse, or interpret data;
- to make decisions that affect participants;
- to produce research outputs intended for dissemination.

Where the use of AI materially affects ethical risk, transparency, or participant protections, it will be considered as part of ethical review and may influence the level of scrutiny required.

Detailed guidance on acceptable use, disclosure expectations, and examples is provided in institutional guidance.

10. Informed Consent and Participant Rights

Informed consent is a fundamental requirement of ethical research and must be obtained prior to participation in research activities, unless a justified and approved exception applies.

Researchers must ensure that participants:

- are provided with clear, accessible, and sufficient information about the purpose, methods, and nature of the research;
- understand what participation involves, including any potential risks or benefits;
- are informed of how their data will be used, stored, and, where applicable, disseminated;
- are aware of their right to decline participation or withdraw at any time without disadvantage; and
- are informed of any limits to confidentiality, including circumstances where disclosure may be required.

Consent must be appropriate to the research context and participant needs and may be obtained in written, electronic, or verbal form, provided it is documented and auditable.

Where research involves vulnerable participants or complex consent considerations, additional safeguards and ethical scrutiny are required.

11. Data Protection, Confidentiality, and Data Management

All research conducted under this policy must comply with applicable data protection legislation, including the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018, as well as Arden University's data protection and information governance policies.

Researchers are responsible for ensuring that:

- personal data is processed lawfully, fairly, and transparently;
- only data that is necessary for the stated research purpose is collected;
- appropriate measures are in place to protect confidentiality and data security;
- data is anonymised or pseudonymised wherever possible; and
- data is retained, stored, and disposed of in accordance with institutional retention requirements.

Research data must be stored securely using approved institutional systems. The use of external or third-party platforms must be justified and compliant with University policies.

Further guidance on research data management is provided separately.

12. Safeguarding and Duty of Care

Arden University has a duty of care to research participants, researchers, and others affected by research activity.

Researchers must identify and appropriately manage safeguarding risks, particularly where research involves:

- children or young people;
- adults who may be considered vulnerable;
- sensitive or distressing topics; or
- settings where there is an increased risk of harm.[1]

Researchers must also be aware that there may be legal or statutory obligations to disclose information in specific circumstances, including where there is a risk of serious harm to individuals or others.

Such risks must be identified during ethical review, clearly communicated to participants where relevant, and managed in accordance with institutional safeguarding procedures.

12.1. Research involving Arden University students

Research involving Arden University students requires explicit consideration of actual or perceived power imbalances, voluntariness of participation, and the impact on assessment, progression or student experience.

[1] Harm refers to any actual or potential adverse impact arising from research activities that negatively affects the rights, safety, dignity, or well-being of participants, researchers, or others who may be affected by the research. This includes physical, psychological, social, economic, legal, or reputational harm, whether occurring directly through participation or indirectly through research processes or outcomes. UK Research and Innovation, *Preventing harm (safeguarding) in research and innovation policy* (2024) UKRI-040424-Preventing-harm-Safeguarding-in-Research-and-Innovation-policy.pdf

Ethical review must consider whether:

- participation could be perceived as compulsory;
- recruitment is undertaken by staff directly responsible for teaching or assessment;
- alternative recruitment methods are available; and
- appropriate safeguards are in place.

13. Research Involving External Organisations and Sponsors

Where research involves external organisations, partners, or sponsors, researchers must ensure that:

- appropriate organisational or gatekeeper permission is obtained prior to participant recruitment or data collection;
- roles, responsibilities, and expectations are clearly defined;
- any additional ethical, legal, or contractual requirements are identified and met;
- data ownership, intellectual property, and publication rights are agreed where applicable; and
- their information is available for organisation gatekeepers to make an informed decision to permit their organisation to be part of the study.

Research involving external sponsors or funders may be subject to additional ethical obligations and reporting requirements. These must be declared and addressed as part of ethical review.

International research must take account of local legal, cultural, and ethical considerations in addition to UK requirements.

Where research is conducted through a partner institution, collaborative partner or franchise arrangement, researchers must comply with this policy unless an equivalent ethical review process has been formally recognised by Arden University.

14. Training, Support, and Research Culture

Arden University is committed to fostering a positive research culture in which ethical practice is embedded and supported.

The University will:

- provide guidance and training to staff and students on ethical research practice, signposting the relevant policies and processes;
- support supervisors, reviewers, and committee members in fulfilling their ethical responsibilities; and
- promote awareness of ethical standards and research integrity across the institution.

Researchers are expected to engage with relevant training and guidance appropriate to their role and level of experience.

15. Misconduct and Complaints

Failure to comply with this policy or with the conditions of ethical approval may constitute a breach of research ethics and, in some cases, research misconduct.

Concerns relating to ethical breaches, misconduct, or participant complaints will be managed in accordance with Arden University's relevant policies and procedures, including those relating to research misconduct and whistleblowing.

Participants must be provided with appropriate contact details for raising concerns or complaints about research participation.

16. Monitoring, Review, and Continuous Improvement

Ethical responsibility extends beyond approval and throughout the research lifecycle, including dissemination, publication, and secondary use of research outputs. Arden University will monitor the operation of this policy and the effectiveness of its ethical review processes to ensure they remain robust, proportionate, and aligned with sector expectations.

The policy will be reviewed periodically to reflect:

- changes in legislation or regulatory requirements;
- developments in research practice or emerging technologies;
- feedback from staff, students, and committees; and
- external guidance and best practice.

Continuous improvement in ethical governance is integral to maintaining research quality, integrity, and public trust.

Appendix A – Ethical Risk Levels

1. Low/Medium-Risk Research

Low/Medium-Risk Research includes projects where some risks may be present, but where those risks are low-level, foreseeable, and effectively mitigated through appropriate design and safeguards. Such projects do not exceed the level of risk encountered in everyday life, professional practice, or routine educational research contexts.

Research in this category typically involves:

- Adult participants who are not considered vulnerable
- Identifiable personal data that is non-sensitive and appropriately anonymised or pseudonymised
- Limited use of Special Category Data where justified and where risks of harm or distress are minimal and mitigated
- Common research methods such as surveys, interviews, focus groups, or non-intrusive observations
- Minimal or mild deception that does not conceal risk and is followed by a clear debrief
- Reasonable incentives or reimbursements that do not exert undue influence (Staff only)

Potential impacts:

- No more than minimal discomfort, inconvenience, or short-term emotional impact, comparable to that encountered in everyday life.
- No realistic risk of serious psychological, physical, legal, or reputational harm

Governance arrangements:

- Informed consent is clear, explicit, and documented
- Risks are clearly identified and proportionately mitigated
- No requirement for external ethical approval

2. High-Risk Research

High-Risk Research involves inherent or residual ethical risks that remain significant even after reasonable mitigations are applied. These projects often require complex ethical judgement and therefore require full review by the Research Ethics Committee.

Research in this category may involve:

- Vulnerable groups such as children, adults lacking capacity, trauma-affected individuals, patient populations or detained populations
- Extensive or intrusive Special Category Data, including topics such as trauma, abuse, self-harm, or sexual behaviour
- Settings or activities requiring DBS checks due to participant vulnerability
- Invasive or physically demanding procedures, or biological samples governed by the Human Tissue Act (2004)

Potential harms:

- Meaningful risk of psychological distress, re-traumatisation, or physical harm
- Significant reputational, occupational, or social risks to participants or researchers
- Likelihood of safeguarding or legal disclosures (e.g. self-harm, serious criminal activity)

Research design features:

- Significant deception where participants are misled about the nature or risks of participation
- Strong or unmitigated power imbalances
- Incentives that may exert undue influence or coercion (staff only)
- Requirement for external ethical approval (e.g. NHS, military, schools, prisons)
- Procedures or environments exceeding what participants would reasonably encounter in everyday life

3. Impermissible Research

Research will not be permitted where it:

- Violates legal requirements or professional, statutory, or regulatory body standards
- Involves unmitigated high-risk elements or disproportionate harm
- Uses deception that is unjustified, excessive, or inadequately debriefed
- Proceeds without meaningful informed consent
- Encourages or requires illegal activity
- Falls outside the competence of the researcher(s)
- Requires ethical approval or gatekeeper permission that has not been obtained
- Risks serious harm to participants, researchers, or the institution
- Does not meet programme-specific academic or professional requirements

Appendix B – Amendments to Ethical Approval

Ethical approval granted under this policy is conditional, time-limited, and subject to ongoing compliance. Researchers retain responsibility for ensuring that their research continues to meet ethical and safeguarding standards throughout the research lifecycle.

Where changes are proposed to an approved project, researchers must consider whether those changes materially affect the ethical basis on which approval was granted.

Principles governing amendments

The following principles apply to all amendments to ethically approved research:

- **Continuity of ethical responsibility** – Ethical approval applies to the approved design, scope and conditions of a project. It does not automatically extend to material changes.
- **Materiality and risk** – Changes that may affect participants, consent, safeguarding, data use, methods, dissemination, or the overall risk profile of the research require further ethical consideration.
- **Safeguarding and duty of care** – Any change that introduces new or increased safeguarding risks, involves new participant groups, or alters support arrangements must be reviewed before implementation.
- **Proportionality** – Ethical consideration of amendments will be proportionate to the nature and level of risk introduced by the proposed change.
- **Prior approval** – Material amendments must be reviewed and approved through an appropriate ethical route before the amended activity takes place.
- **Ongoing dialogue** – Researchers are expected to seek advice where there is uncertainty about whether a change constitutes a material amendment.

Failure to seek ethical consideration for material amendments may constitute a breach of this policy and may, in some cases, be treated as research misconduct.

Amendments Process

Where a proposed change is identified as a material amendment, the following process applies:

1. **Identification:** The researcher (or student researcher, with supervisory support) identifies a proposed change to an ethically approved project and

considers whether it may materially affect ethical risk, safeguarding, consent, data use, or dissemination.

2. **Notification and submission:** Details of the proposed amendment, including the rationale and any updated participant materials, are submitted for ethical consideration via the appropriate institutional route.

3. **Proportionate ethical consideration:** Amendments are considered on a risk-based and proportionate basis, with lower-risk amendments normally considered through delegated ethical review and higher-risk amendments escalated for committee consideration where required.

4. **Decision and conditions:** The outcome of amendment consideration may include approval, approval with conditions, a request for further information, or referral for further ethical review.

5. **Implementation:** Approved amendments may be implemented only once ethical consideration has been completed and any conditions have been met.

Researchers are expected to retain records of approved amendments and ensure that any changes are reflected in project documentation, participant information, and subsequent dissemination or publication.

The University will keep its approach to ethical amendments under review and will publish further guidance as processes and systems are developed.

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