THE LONDON SCHOOL OF ECONOMICS AND POLITICAL SCIENCE

Academic

# Research Ethics Policy and Procedures

## Statement of Principles

1. The Research Ethics Policy forms a part of the School's over-arching Ethics Code[1].

2. Researchers in the social sciences have responsibilities: to society at large; to those who fund their research; the institutions that employ them or at which they study; to their colleagues and the wider academic and research community; to the people who take part in their research; and for their own safety and wellbeing. Reconciling those responsibilities can be difficult and may entail ethical judgement. The intention informing this policy statement is that the School should provide a procedural framework to assist staff and students in exercising such judgement.

3. The policy relates to research - whether funded or unfunded - involving human participants[2], or involving data relating to directly identifiable human subjects (whether living or recently deceased), conducted by researchers[3]. It does not relate to other ethical judgements. For the purposes of this policy, the term 'researcher' includes members of the School's academic, contract research staff, postgraduate research and Master's students, and undergraduate students. 'Research' is defined variously according to the Frascati definition or the HEFCE definition used for the Research Excellence Framework.

4. The policy has been adopted in support of the School's wider commitments to intellectual freedom and research excellence. Sound ethical standards are a pre-requisite for excellent research. Equally, disproportionate, over-burdensome and narrowly framed research ethics procedures can be an obstacle to excellent research, and thus themselves create an ethical challenge.

5. The procedures instituted in pursuit of this policy are intended:
   - to facilitate, not inhibit, research;
   - to promote a culture within the School whereby researchers conscientiously reflect on the ethical implications of their research;

[1] http://www.lse.ac.uk/intranet/LSEServices/policies/pdfs/school/ethCod.pdf

[2] Should it arise, researchers conducting research involving animals should consider such elements of this policy as may apply, as well as any other relevant guidelines. Please contact the Research Ethics Committee via research.ethics@lse.ac.uk to check discuss ethics review.

[3] Research involving secondary analysis of established data sets from which it would not be possible to identify any living or recently deceased person need not be subject to the procedure, but wherever it is necessary for data to be effectively anonymised by LSE researchers, the procedure applies.

- to apply a principle of subsidiarity whereby responsibility for research ethics will be embraced by researchers, supervisors, departments or institutes at a level as close as appropriately possible to the actual conduct of the research.

6. The policy is subject to oversight by the Research Ethics Committee, which is accountable to the Research Committee, the Ethics Policy Committee, Academic Board and ultimately Council. It will be reviewed periodically. The policy is freely available to potential research funding agencies in the interests of transparency and to avoid possible pre-contractual misunderstandings. This document has been drawn up with regard to ethical guidelines relevant to research within the School. Any researcher considering research ethics should do so in conjunction with the resources and policies listed in Annex A.

# Policy

## Research ethics applications

7. Where research involves human participants (for example, for interviews, focus groups, surveys, observations, etc.), or involves data relating to directly identifiable human subjects, researchers are required to complete a Research Ethics Review Checklist (see Annex B). The purpose of the Checklist is to require researchers to reflect on the potential ethical implications of their research and the risk of harm (including risks to livelihoods, social relationships, emotional well-being, etc.) that might be caused to the participants.

8. Having completed the Checklist, if researchers (or in the case of student researchers, their supervisors) judge (i) that no significant ethical issues are raised by their research or (ii) that adequate safeguards in relation to such issues can and will be put in place, they may complete the Low risk/Departmental / Centre / Institute Certification in Part II of the ethics review form. The form will then need to be approved/signed by the relevant approver as follows:

| **Ethics form submitted by** | **Reviewed and approved by** | **Audited by*** |
|---|---|---|
| MSc (or undergraduate) students | Project academic supervisor (PhD students should not approve ethics review forms) | Programme director |
| PhD students | Supervisor | Doctoral Programme Director |
| Research staff who are not PIs | Principal Investigator | Designated research ethics champion (as below) |
| **Ethics form submitted by** | **Counter-signed by** | |
| All faculty and any research staff who are PIs on grants | A designated research ethics champion, for example the Research Director within Departments, Institutes or Centres; | |

*By 'audited' we mean that the relevant person should check/moderate a sample of review forms to check that Departmental/Centre/Institute Certification is appropriate (i.e. whether the review form should instead have been sent to the Research Ethics Committee for review).

9. Completed ethics review forms approved by Departmental Certification must be kept on file within the department for seven years or until the completion of the research, whichever is the later.

10. If your research may be subject to ethics review by an external body, please refer to section 15 below.

11. Where Departmental/Centre/Institute Certification is not appropriate, the researcher should complete the Questionnaire (part III of the Review document). This may be because, in the judgment of the researcher (or the supervisor in the case of students), or in the judgement of the relevant Head

of Department or Research Centre (or any departmental committee or subcommittee having responsibility for research ethics) or in the judgement of the Chair of the Research Ethics Committee (where it comes to his/her attention):

i) significant ethical issues are raised by the research and Departmental/Centre/Institute certification of the measures taken to address them would not be appropriate (which includes research characterised by one or more of the features set out in section 13 below; and/or

ii) the researcher wants to seek the advice of the Research Ethics Committee; and/or

iii) external obligations (for instance, funder requirements, data access requirements) require it; and/or

iv) the research will be undertaken by a student or member of staff who does not have sufficient relevant experience or has not received appropriate training in research ethics (see section 27, below).

12. Having completed the Questionnaire, the Review form and any accompanying documents (including the Informed consent documentation) must be submitted for scrutiny by the Research Ethics Committee by email to research.ethics@lse.ac.uk. Note that ethical approval will normally be required before the commencement of research covered by this policy, or else at a particular point in the development of the project, if required by the research funder[4]. (See section 31 below for more details of the procedure for reviews conducted by the Research Ethics Committee.)

13. **Applications relating to the following kinds of research should always be subject to review by the Research Ethics Committee**:

(i) Research involving deception of participants, or that is intentionally conducted without their full and informed consent at the time the study is carried out or when the data are gathered

(ii) Research which involves or may lead to the publication of confidential information

(iii) Research where informed consent will be obtained orally but not in writing[5]

(iv) Research involving any of the following:
- vulnerable groups[6];
- sensitive topics[7];
- groups where permission of a gatekeeper is normally required for initial access to members (where involvement of the gatekeeper might raise issues of whether participants' involvement is truly voluntary);
- research which would induce undue psychological stress, anxiety or humiliation or cause more than minimal pain.

(v) Research involving more than minimal risk of harm (whether emotional or physical) to the researcher(s).

Where there is doubt, advice should be sought from the Research Governance Manager and/or the

[4] For example, the ESRC requires full ethical scrutiny and approval only after the confirmation of award. However some funders require ethical safeguards to be described in advance of application, and ethical approval after confirmation of award.

[5] Staff and students in the Anthropology department who will not be obtaining written consent may use their departmental ethics review procedure.

[6] Please note that we follow the ESRC definition of vulnerability as follows: 'Vulnerability may be defined in different ways and may arise as a result of being in an abusive relationship, vulnerability due to age, potential marginalisation, disability, and due to disadvantageous power relationships within personal and professional roles. Participants may not be conventionally 'vulnerable', but may be in a dependent relationship that means they can feel coerced or pressured into taking part, so extra care is needed to ensure their participation is truly voluntary.' https://esrc.ukri.org/funding/guidance-for-applicants/research-ethics/frequently-raised-topics/research-with-potentially-vulnerable-people/

[7] See excerpt from Dixon-Swift, V. et al. *Undertaking Sensitive Research in the Health and Social Sciences* - at http://assets.cambridge.org/97805217/18233/excerpt/9780521718233_excerpt.pdf

Chair of the Research Ethics Committee (via research.ethics@lse.ac.uk).

14. Substantial research projects and projects presenting significant ethical challenges will on occasions require Project Advisory Panels to be established to oversee the progress of the project and in such instances, it may be appropriate that a member of the Research Ethics Committee should sit on the Advisory Panel.

15. Duplication of ethics reviews will be avoided where possible, especially in regard to research that may fall under the rubric of other ethics review bodies (e.g. NHS Research Ethics Committees[8], or the Research Ethics Committees of another university). In these cases the researcher should send their completed ethics review Checklist to the Research Governance Manager (research.ethics@lse.ac.uk) for reference and submit their research for ethics approval to the appropriate body. Once ethics approval has been granted a copy of the letter of approval and relevant documentation should be sent to research.ethics@lse.ac.uk for the records of the LSE Research Ethics Committee. Notwithstanding the principle of avoiding duplication, if deemed appropriate the School will consider the ethical implications of the research in its own right (regardless of whether approval has already been granted externally).

## Informed consent

16. Where information is to be collected from human participants, other than in very particular circumstances informed consent will have to be obtained from those subjects for any use of their information. Researchers should refer to the LSE guidance on Informed Consent[9]. Second, where the research exposes its participants to a risk of harm, the researcher has an ethical duty to consider these risks, even where the participant has consented to participate in the study. It is particularly important to think through carefully the likely impact on vulnerable groups; for example children or people with learning disabilities, or students when they are participating in research as students. Some participants will have diminished capacity to give consent and are therefore less able to protect themselves and require specific consideration. Researchers should refer to the LSE Safeguarding Policy[10].

17. Research that does not entail the direct participation of living human persons may nonetheless indirectly but significantly affect living persons. Researchers may be assessing information about identifiable individuals, the publication or analysis of which may have ethical (and indeed legal) implications. For example, collection and use of archive, historical, legal, online or visual materials may raise ethical issues (e.g. for families and friends of people deceased), and research on provision of social or human services may impact provision for individuals and groups of service users who did not contribute or consent to, or were not consulted about the research. Researchers should so far as possible consider such implications.

## Multi-funder and multi-performer projects

18. Where there are a number of funders of a project the LSE Research Ethics Policy and any relevant funders' ethics policies must be drawn to the attention of all proposed funders prior to a submission for funding. An agreement is necessary with the other funders that the proposed study will comply with all relevant research ethics policies.

19. Where research involves more than one institution, each institution retains formal responsibility for overseeing the ethical review of research conducted under its auspices. Wherever possible the School should accept the decisions made by the Research Ethics Committee of the institution where the Principal Investigator is based.

[8] In general, research falling under the auspices of the Health Research Authority will undergo review by an NHS Research Ethics Committee. See section 26 below.
[9] http://www.lse.ac.uk/intranet/LSEServices/policies/pdfs/school/infCon.pdf
[10] https://info.lse.ac.uk/staff/services/Policies-and-procedures/Assets/Documents/safPol.pdf

## Research conducted outside the UK

20. Where research is to be conducted outside the UK, the researcher must establish whether local ethical review is required by the host country, and if not, how the principles of the Research Ethics Policy can be followed in developing and undertaking the research. The ethical standards that the School expects for UK research apply equally to work undertaken outside the UK. Researchers must, however, ensure that they comply with any legal and ethical requirements of the country/ies where the research is taking place[11].

21. Where the LSE researcher will be hiring local research assistants or project partners overseas, they must ensure that appropriate training is given, and also that any such collaborators work in accordance with the principles of the LSE Research Ethics Policy, data protection policies, and Safeguarding Policy.

## Legal and data protection requirements

22. Researchers must comply with legal requirements. In particular, they must ensure compliance with the UK Data Protection Act 2018 and EU General Data Protection Regulation (GDPR).
23. Where appropriate, researchers must submit to a Disclosure and Barring Service check (for link see Annex A).

24. It remains the responsibility of the researcher to ensure that arrangements are in place to maintain the integrity and security of research data. Please refer to Annex A for guidance on LSE research data management. If further guidance is required regarding the security of data then the matter may be referred to the Research Ethics Committee.

25. Secondary use of datasets must be given careful consideration by the researcher and the Research Ethics Committee, especially where reliance is being placed on a presumed consent by subjects to the use of their information, or where there is a potential risk of disclosure of sensitive information. Researchers who collect primary data that are to be archived and may be used by others for secondary analysis should be mindful that the consent obtained from the persons providing such data and the safeguards applied to protect their identity should be sufficient for that secondary purpose. (For guidance on these matters please contact the Research Data Librarian via Datalibrary@lse.ac.uk )

## Health and Social Care research

26. Researchers working in the field of health or social care must comply with the *UK policy framework for health and social care research*[12]. The policy framework applies to health and social care research involving patients, service users or their relatives or carers. This includes research involving them indirectly, for example using information that the NHS or social care services have collected about them. Researchers should check whether their research should undergo ethics review via the Health Research Authority[13]. Under the UK Policy Framework, the researcher carries defined responsibilities as does the School in its capacity as the employer of the investigator. In addition to the ethics procedures outlined here, documentation will be held on record demonstrating compliance with the UK Policy Framework. The Director of the Research Division will provide written confirmation of

[11] A useful resource is the US Department of Health and Human Services International Compilation of Human Research Standards listing, available at: https://www.hhs.gov/ohrp/international/compilation-human-research-standards/index.html

[12] https://www.hra.nhs.uk/documents/1068/uk-policy-framework-health-social-care-research.pdf

[13] There is an easy-to-use tool to help you ascertain whether or not you need HRA approval or not at: http://www.hra-decisiontools.org.uk/ethics/ For further guidance see: http://www.hra.nhs.uk/research-community/before-you-apply/determine-which-review-body-approvals-are-required/

compliance on behalf of the School, as required by the UK Policy Framework, seeking advice from the Chair of the Research Ethics Committee where necessary.

## Training

27. All students and staff undertaking research are required in the course of their studies or career to have undertaken appropriate training or to have had significant relevant experience before embarking on an evaluation of the ethical implications of their research or other aspects of this Policy. Students and staff must responsibly consider whether their training or experience sufficiently qualifies them to evaluate the ethical implications of their research. If not, they should in the first instance seek appropriate advice from within their department or centre and/ or from colleagues within their discipline with specific expertise in relation to research ethics. Thereafter, in the event of any remaining uncertainty as to the propriety of their research, they are required to submit their research plans to the Research Ethics Committee.

28. This policy should be formally incorporated into any undergraduate/postgraduate training programme/documentation offered at departmental level. All degree programmes (undergraduate, Master's and research degrees) must incorporate at least one lecture, seminar or support session that covers research ethics. All students undertaking research for a dissertation or thesis should have access through their supervisor to appropriate advice and support in relation to research ethics. For further information on training please contact research.ethics@lse.ac.uk. Students should also refer to the training available via LSE LIFE and the PhD Academy.

29. All academic members of the Research Ethics Committee are required to have undertaken appropriate training and/or to have had significant relevant experience before taking up their responsibilities on the Committee.

30. Members of the Policy Team of the Research Division, the Director of the Research Division and the Deputy Director of the Research Division, or any other member of the School's administration, are required satisfactorily to have undertaken suitable training or to have had significant relevant experience before providing advice on the implementation of this Policy.

## Procedures for review by the Research Ethics Committee

31. Applications should be submitted to the Research Ethics Committee via the Research Governance Manager (research.ethics@lse.ac.uk). Researchers should incorporate an appropriate lead-time into planning of their research. The timeframe for REC decision-making can be found at: https://info.lse.ac.uk/staff/divisions/research-division/committees-and-working-groups/Research-ethics-committee

32. The Research Ethics Committee may undertake an expedited review (where the review is carried out by the Chair, who may consult one or more members of the Research Ethics Committee) where this is appropriate in the view of the Chair - generally where research involves no deception, where participants will have consented to participate in writing, and where the potential of the research to cause a risk of harm to participants and others affected by it is not deemed significant. Decisions taken by expedited review will be reported to the Research Ethics Committee.

33. The Chair (in the case of expedited review) or the Committee or a sub-group of the Committee (in the case of full review) will reach a decision on the application as promptly as reasonably possible, having regard to the circumstances and the urgency with which approval may be required

34. Where a case is submitted for full review, the Research Ethics Committee or a sub-group of the Committee will make decisions using a majority voting procedure. Where the Committee is not satisfied with an application, the Chair will consult with the applicant with a view to devising a solution that is acceptable to both the Committee and the researcher. The Committee may at its

discretion request advice and guidance from the Pro Director of Research, members of the Research Committee and School colleagues with particular expertise, and in addition may call upon outside experts to assist with advice and review as required. Decisions made by the Research Ethics Committee for each proposal will be minuted and provided to the relevant researcher(s). The decision will be kept on file for a period of at least seven years or for the duration of the project (whichever is longer).

35. Committee decisions to reject a proposal are very rare. However, should the Committee decline to accept a proposal, the researcher has the right to request that the decision is considered by the Ethics Appeals Panel.

36. Appeals should be made in writing to the Chair of the Ethics Appeals Panel providing all the documentation considered by the Research Ethics Committee and a covering letter setting out sufficient information to allow the grounds for appeal to be understood and demonstrating clearly the basis of the appeal.

37. The Ethics Appeals Panel will consist of the following:
    (i) Pro-Director for Research as Chair (the Pro-Director has the right to appoint another senior member of academic staff in his or her absence)
    (ii) A senior academic appointed by the Chair
    (iii) The Director of the Research Division (who also acts as the Secretary of the Panel)
    (iv) If additional expertise is required, the Chair may invite up to two further members of academic staff with relevant expertise but who have not been involved in the initial decision to join the panel.

38. All members of the Panel must be fully apprised of and familiar with the School's Research Ethics Policy.

39. Unless the Panel decides to uphold the appeal, hearings must provide the researcher with the opportunity of presenting his/her case in person. Following the withdrawal of the researcher, the Panel will determine its decision and provide clear justification for its decision, whether the appeal has been successful or unsuccessful.

40. Any complaints against the Research Ethics Committee received from external organizations will be considered by the Pro-Director for Research in the first instance and referred to the Ethics Appeals Panel if considered necessary. For external complaints the same procedures detailed above will be implemented.

## Institutional monitoring

41. In the first instance it will be the responsibility of the researcher to monitor the conduct of research that has received ethical approval (for students, in consultation with supervisors). The researcher, together with any Project Advisory Panel or Group where relevant, must ensure that there is an appropriate continuing review of the research, taking into account any possible changes that may occur over the duration of the research project. It is the responsibility of the researcher to alert the Chair of the Research Ethics Committee if any further ethical implications arise. It is the responsibility of the researcher to ensure that data are securely held and preserved.

42. The Research Ethics Committee will periodically conduct a selective audit of current research projects.

43. Where significant concerns have been raised about the ethical conduct of a study, the Research Ethics Committee can request a full and detailed account of the research for a further ethical review.

44. Where the Research Ethics Committee considers that a study is being conducted in a way which is not in accord with the conditions of its original approval it may consider withdrawal of its approval

and require that the research be suspended or discontinued. It is the duty of the Research Ethics Committee to inform the appropriate funding body that ethical approval has been revoked.

## Failure to comply with this Policy

45. Failure to undertake a review of the ethical implications of research or to comply with any other aspect of this Policy or failure to apply reasonable care in assessing the likely ethical implications of a research project, may constitute research misconduct under the School's research misconduct policy and procedures (see Annex A).

# Annex A: Useful External and School Resources

## 1. External Resources

**Anonymisation: managing data protection risk**.
The Information Commissioner's Office (ICO) Code of Practice is available at:
https://ico.org.uk/media/for-organisations/documents/1061/anonymisation-code.pdf
The ICO also has a code of practice on writing privacy notices, which is available at:
https://ico.org.uk/media/for-organisations/guide-to-data-protection/privacy-notices-transparency-and-control-1-0.pdf

**Disclosure and Barring Service**
Criminal record checking which may be required if working with children or vulnerable groups. See:
https://www.gov.uk/government/collections/dbs-checking-service-guidance--2

**ESRC Framework for Research Ethics**. The ESRC requires that the research it supports is designed and conducted in such a way that it meets certain ethical principles; that it is subject to proper professional and institutional oversight in terms of research governance.

http://www.esrc.ac.uk/files/funding/guidance-for-applicants/esrc-framework-for-research-ethics-2015/
See also ESRC Postgraduate Training Guidelines:
https://esrc.ukri.org/files/skills-and-careers/doctoral-training/postgraduate-training-and-development-guidelines-2015/

**European Commission: How to complete your ethics Self-Assessment**
http://ec.europa.eu/research/participants/data/ref/h2020/grants_manual/hi/ethics/h2020_hi_ethics-self-assess_en.pdf

**European Science Foundation European Code of Conduct for Research Integrity.** The code addresses the proper conduct and principled practice of systematic research in the natural and social sciences and the humanities in Europe. https://ec.europa.eu/research/participants/data/ref/h2020/other/hi/h2020-ethics_code-of-conduct_en.pdf

**International Compilation of Human Research Standards** listing (published by the US Department of Health and Human Services) provides a listing of laws, regulations, and guidelines on human subjects protections in 130 countries and from many international organizations:
https://www.hhs.gov/ohrp/international/compilation-human-research-standards/index.html

**Nuffield Council on Bioethics: The ethics of research involving animals.**
http://nuffieldbioethics.org/project/animal-research/

**RCUK Policy and Guidelines on the Governance of Good Research Conduct**. The policy aims to help researchers and research organisations to manage their research, and provides guidance of the reporting and investigation of unacceptable research misconduct.
http://www.rcuk.ac.uk/Publications/researchers/grc/

**The Research Ethics Guidebook**. An online guide for social science researchers
http://www.ethicsguidebook.ac.uk/

**UKRIO Code of Practice for Research: Promoting good practice and preventing misconduct.** An essential reference tool to support researchers in the conduct of their research.
http://www.ukrio.org/what-we-do/code-of-practice-for-research/

**UK policy framework for health and social care research** The policy framework applies to health and social care research involving patients, service users or their relatives or carers. This includes research

involving them indirectly, for example using information that the NHS or social care services have collected about them.
https://www.hra.nhs.uk/documents/1068/uk-policy-framework-health-social-care-research.pdf

**Universities UK Concordat to support research integrity**. The Concordat sets out five commitments that will provide assurances to government, the wider public and the international community that research in the UK continues to be underpinned by sound standards of rigour and integrity. http://www.universitiesuk.ac.uk/highereducation/Pages/Theconcordattosupportresearchintegrity.aspx

## 2. Relevant Statutes

The Research Ethics Policy has been drawn up with due regard to relevant statutes, including:

**The Data Protection Act (2018)** http://www.legislation.gov.uk/ukpga/2018/12/contents/enacted

**The Mental Capacity Act (2005)** http://www.legislation.gov.uk/ukpga/2005/9/contents

## 3. LSE Resources

The Research Ethics Policy should be read in conjunction with other School regulations, policies and procedures, including:

**Code of Research Conduct (incorporating research misconduct policy and procedures)**
http://www.lse.ac.uk/intranet/LSEServices/policies/pdfs/school/codResCon.pdf

**Data Protection and Research**
http://www.lse.ac.uk/intranet/LSEServices/policies/pdfs/school/datProRes.pdf

**Data Storage and Management**
The School's Records Management Policy is available at:
https://info.lse.ac.uk/staff/services/Policies-and-procedures/Assets/Documents/recManPol.pdf

For information on research data management see the Library guidance at:
http://www.lse.ac.uk/library/research-support/research-data-management

**Ethics Code:** The LSE Ethics Code is a set of six core principles, including Responsibility and Accountability, Integrity, and declaring conflicts of interest. See:
http://www.lse.ac.uk/intranet/LSEServices/policies/pdfs/school/ethCod.pdf

**Freedom of Information (FoI) obligations**. The LSE is obliged to meet the requirements of the FoI Act 2000. The School should maintain a list of the information it makes available as a matter of routine. Any person making a request for information is entitled to be informed in writing whether the School holds the information specified in the request, and if that is the case, to have that information communicated to them.
https://info.lse.ac.uk/Staff/Divisions/Secretarys-Division/Information-Rights-and-Management/Freedom-of-information

**Information Security Policy.** The LSE Information Security policy can be found at:
http://www.lse.ac.uk/intranet/LSEServices/policies/pdfs/school/infSecPol.pdf

**Informed consent:** The School's guidance on informed consent (including a sample Information Sheet and Consent form template) can be found at:
http://www.lse.ac.uk/intranet/LSEServices/policies/pdfs/school/infCon.pdf

**Procedures for the Ethical Screening of Grants and Donations**.
https://info.lse.ac.uk/staff/services/Policies-and-procedures/Assets/Documents/proEthScr.pdf

# Annex B: Research Ethics Review form

A Word version of this form is available at: https://info.lse.ac.uk/staff/services/Policies-and-procedures/Assets/Documents/resEthPolProForm.docx

This form should be completed for every research project that involves human participants or the use of information relating to directly identifiable individuals.

## PART I - CHECKLIST

The Checklist is designed to identify the nature of any ethical issues raised by the research.

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

**1. Name of Researcher:**

| | | | | | |
|---|---|---|---|---|---|
| | Status *(mark with an 'X' as appropriate)* | Undergraduate student | | Masters student | |
| | | Research degree student | | Staff | |
| | Email | | Telephone number | | |
| | Department | | | | |

**2. Student Details if applicable:**

| | | | | |
|---|---|---|---|---|
| | Degree programme: | | | |
| | Supervisor's name: | | Supervisor's email: | |
| | Supervisor's department: | | | |

**3. Title of the proposal and brief abstract**

**i) Title:**

**ii) Abstract**

*(approx.150-200 words. Your abstract should outline in non-technical language **the purpose of the research** and the **methods** that will be used.)*

**4. Funding**

Is it proposed that the research will be funded?

If so by whom?

**5. Where the research will be conducted**

In what country/ies will the research take place? (See Note 1)

**6. Data Management Plans**

Please confirm whether you have completed a Data Management Plan and submitted it to Datalibrary@lse.ac.uk ? (*See Note 2*) Yes / No

| | *Please mark an X in the appropriate right-hand column/box* | **Yes** | **No** | **Not certain** |
|---|---|---|---|---|
| **7. Research that *may* need to be reviewed by an external (non-LSE) Ethics Committee** | | | | |
| i | Will the study require Health Research Authority approval? *(See Note 3)* | | | |
| ii | Does the study involve participants lacking capacity to give informed consent? *(See Note 4)* | | | |
| iii | Is there any other reason why the study may need to be reviewed by another external (non-LSE) Ethics Committee?<br>If yes, please give details here: | | | |
| **If your research will be reviewed by an external (non-LSE) ethics committee,** you may not need to complete the rest of this LSE review form – please email research.ethics@lse.ac.uk for guidance. | | | | |
| | | | | |
| **8. Consent** (See Note 5) | | | | |
| i | Does the study involve children or other participants who are potentially or in any way vulnerable or who may have any difficulty giving meaningful consent to their participation or the use of their information? *(See Note 6)* | | | |
| ii | Are subjects to be involved in the study without their knowledge and consent (e.g. through internet-mediated research, or via covert observation of people in public places)? | | | |
| iiii | Will the study require the co-operation of a gatekeeper for initial access to the groups or individuals to be recruited? *(Answer 'yes' to this question only if the involvement of a gatekeeper in your study might raise issues of whether participants' involvement is truly voluntary or of whether the gatekeeper might influence potential participants in some other way.)* | | | |
| **9. Research Design / Methodology** | | | | |
| i | Does the research methodology involve the use of deception? *(See Note 7)* | | | |
| ii | Are there any significant concerns regarding the design of the research project? For example:<br>• where research intrudes into the private sphere or delves into some deeply personal experience;<br>• where the study is concerned with deviance or social control;<br>• where the study impinges on the vested interests of powerful persons or the exercise of coercion or domination; or<br>• where the research deals with things that are sacred to those being studied that they do not wish profaned. | | | |
| iii | Does the proposed research relate to the provision of social or human services? | | | |
| **10. Financial Incentives** | | | | |
| | Will financial inducements (other than reasonable expenses and compensation for time) be offered to participants that might have an impact on the objectivity of the research? | | | |

| | *Please mark an X in the appropriate right-hand column/box* | **Yes** | **No** | **Not certain** |
|---|---|---|---|---|
| **11. Research Subjects** | | | | |
| i | Could the study induce unacceptable psychological stress or anxiety or cause harm or negative consequences beyond the risks encountered in normal life? | | | |
| ii | Will the study involve discussion of sensitive topics? For example (but not limited to): sexual activity, illegal behaviour, experience of violence or abuse, drug use, etc.). (Please refer to the Research Ethics Policy, § 13). | | | |
| iii | Are drugs, placebos or other substances to be administered to study participants or will the study involve invasive, intrusive or potentially harmful procedures of any kind? | | | |
| **12. Confidentiality** | | | | |
| i | Will research involve the sharing of data or confidential information beyond the initial consent given? | | | |
| ii | Is there ambiguity about whether the information/data you are collecting is considered to be public? | | | |
| iii | Will the research involve administrative or secure data that requires permission from the appropriate authorities before use? | | | |
| iv | Will the research involve the use of visual/vocal methods that potentially pose an issue regarding confidentiality and anonymity? | | | |
| **13. Legal requirements** | | | | |
| | Is there any reason why the research will NOT comply with the requirements of current data protection legislation? (*See Note 8*) | | | |
| **14. Dissemination** | | | | |
| | Are there any particular groups who are likely to be harmed by dissemination of the results of this project? Or is there any potential for misuse of the findings? | | | |
| **15. Risk to researchers** | | | | |
| | Does your research pose any risks to your physical or psychological wellbeing, or that of others working with you? | | | |
| **16. Sensitive research materials** | | | | |
| | Will the research involve accessing security-sensitive material, such as material related to terrorism or violent extremism of any kind? (See Note 9) | | | |

# Please continue to Part II

## PART II: LOW RISK, DEPARTMENTAL/CENTRE/INSTITUTE CERTIFICATION AND/OR NEXT STEPS

Please note that there are certain circumstances where Self-certification of ethics review is not appropriate. Please see Note 10.

**A** If, after careful consideration, you have answered **No** to all the questions, you do not need to complete the questionnaire in Part III, unless you are subject to some external requirement that requires you to seek formal approval from the School's Research Ethics Committee. You can select **A** in the **Low risk, Departmental/Centre/Institute Certification Section** below, sign as appropriate and submit the form to the appropriate approver in your Department, Centre or Institute. Occasional audits of such forms may be undertaken by the School.

**B** If you have answered **Yes** or **Not certain** to any of the questions in sections 8-16 of the checklist you will need to consider more fully how you plan to deal with the ethical issues raised by your research. Answering the relevant questions in the Questionnaire in Part III below may assist you. If having done so you are wholly assured that adequate safeguards in relation to the ethical issues raised can and will be put in place, you may select **B** in the Low risk/Departmental/Centre/Institute certification Section below, sign as appropriate and submit the form to the appropriate approver in your Department, Centre or Institute. Occasional audits of such forms may be undertaken by the School.

**C** If you have answered Yes in section 7 that your research will be subject to review by an external (non-LSE) ethics committee, please select **C** below and send the Checklist (questions 1-7) to research.ethics@lse.ac.uk. You should submit your research for ethics approval to the appropriate external body. Once approval is granted please send a copy of the letter of approval to research.ethics@lse.ac.uk.

**D If Departmental/Centre/Institute certification is not appropriate** you should complete the questionnaire in Part III below, the '**Refer to Research Ethics Committee Section'** at the end of the form, and then submit the form to research.ethics@lse.ac.uk

## LOW RISK, DEPARTMENTAL/CENTRE /INSTITUTE CERTIFICATION

***Select A, B or C*** *(delete as appropriate):*

I have read and understood the LSE Research Ethics Policy and the questions contained in the Checklist above and confirm:

**A** that no significant ethical issues are raised by the research, or

**B** that adequate safeguards in relation to such issues can and will be put in place, or

**C** that the research will be subject to an external ethics review

**Please complete the box below and sign the relevant section**

**i) Summary of any ethical issues identified and safeguards to be taken**

**ii) Details of relevant experience or training in this area**

Low risk/Departmental / Centre / Institute Certifications should be approved as follows:

- MSc (or undergraduate) student review forms should be approved/signed by the academic supervisor. (PhD students cannot approve ethics review forms);
- PhD student review forms should be approved/signed by the supervisor
- Research staff who are not PIs should have their review forms approved/signed by the PI;
- Faculty and any research staff who are PIs on grants should have their review forms counter-signed by a designated research ethics champion in their Department / Centre or Institute, for example its research director

| | | | |
|---|---|---|---|
| Signature of researcher (whether student or staff): | | Date: | |
| Approved by (name) | | | |
| Approved by (signature)*: | | Date: | |

*By signing here the approver confirms that to the best of their understanding any ethical issues have been adequately addressed in the research design, and the researcher has been made aware of her/his responsibilities for the ethical conduct of her/his research. If in doubt, please refer to your departmental ethics champion, or to the Research Governance Manager, research.ethics@lse.ac.uk

## Part III - QUESTIONNAIRE

The questionnaire enables you to explain how the ethical issues relating to your research will be addressed. If you are intending to submit your proposal to the Research Ethics Committee it needs to be completed in full.

**17. Research aims**

*Please provide brief (no more than approx.500 words) details in non-technical language of the research aims, the scientific background of the research and the methods that will be used. This summary should contain sufficient information to acquaint the Committee with the principal features of the proposal. A copy of the full proposal should nonetheless be attached to this document in case it is required for further information.*

**18. Informed consent**

| | |
|---|---|
| i. | Has information (written and oral) about the study been prepared in an appropriate form and language for potential participants? At what point in the study will this information be offered? (See Note 5) |
| | |
| ii | Will potential participants be asked to give informed consent ***in writing*** and will they be asked to confirm that they have received and read the information about the study? If not, why not?<br>*Please attach your proposed information sheet and consent form.* |
| | |
| iii. | If the research takes place within an online community, explain how informed consent will be obtained? What arrangements are in place for ensuring that participants do not include vulnerable groups or children? |
| | |

| | |
|---|---|
| iv. | How has the study been discussed or are there plans to discuss the study with those likely to be involved, including potential participants or those who may represent their views? |
| | |
| v | Will potential participants be clearly informed that no adverse consequences will follow a decision not to participate or to withdraw during the study? |
| | |
| vi | What provision has been made to respond to queries and problems raised by participants during the course of the study? |
| | |
| **19. Research design and methodology** | |
| i | Where the research involves the use of deception (or the withholding of full information about the study), how does the research methodology justify this? |
| | |
| ii | How will data be collected and analysed during the project? |
| | |
| iii | How have the ethical and legal dimensions of the process of collecting, analyzing and storing the data been addressed? |
| | |
| iv | If agencies, communities or individuals may be directly affected by the research (e.g. participants, service users, vulnerable communities or relations), what means have you devised to ensure that any harm or distress is minimized and/or that the research is sensitive to the particular needs and perspectives of those so affected? |
| | |
| **20. Ethical questions arising from the provision of incentives** | |
| | Are any incentives being offered to participants? If so, please provide details |
| | |
| **21. Research participants** | |
| i | Who do you identify as the participants in the project? Are other people who are not participants likely to be directly or indirectly impacted by the project? |
| | |
| ii | Are there any specific risks to research participants or third parties? If so, please give details |
| | |
| iii | If the research involves pain, stress, physical or emotional risk, please detail the steps taken to minimize such effects. |
| | |
| **22. Confidentiality** | |
| i. | What arrangements have been made to preserve confidentiality and anonymity for the participants or those potentially affected, and compliance with data protection law? |
| | |
| ii | Have you considered the limits to confidentiality, if, for instance, a participant should disclose information which suggests that they or someone else may be at significant risk of harm? |
| | |

| | |
|---|---|
| **23. Dissemination** | |
| | Will the results of the study be offered to those participants or other affected parties who wish to receive them? If so, what steps have been taken to minimize any discomfort or misrepresentation that may result at the dissemination stage. |
| | |
| **24. Risk to researchers** | |
| | Are there any risks to researchers? If so, please provide details. |
| | |

## REFER TO RESEARCH ETHICS COMMITTEE

Approval is required by the Research Ethics Committee on one or more of the following grounds (please mark with an 'X' in the appropriate place in the right-hand column):

| | | |
|---|---|---|
| a. | Significant ethical issues are raised by the research, including research characterised by one or more of the following features:<br>(i) Research involving deception of participants, or which is conducted without their full and informed consent at the time the study is carried out or when the data is gathered, or which involves the use of confidential information.<br>(ii) Research where informed consent will be obtained orally but not in writing;<br>(iii) Research involving any of the following: vulnerable groups; personally intrusive or ethically sensitive topics; groups where permission of a gatekeeper is normally required for initial access to members (where involvement of the gatekeeper might raise issues of whether participants' involvement is truly voluntary); research which would induce undue psychological stress, anxiety or humiliation cause more than minimal pain<br>(iv) Research involving more than minimal risk of harm to the researcher(s) | |
| b. | The researcher wants to seek the advice of the Research Ethics Committee | |
| c. | External obligations (for instance, funder requirements, data access requirements) require it | |
| d. | Research undertaken by a student or member of staff who has not received appropriate training or has insufficient experience in research ethics and has been unable to access appropriate advice or support. | |

Please submit your review form, research proposal and your planned Information Sheet and Consent form to research.ethics@lse.ac.uk for review by the Research Ethics Committee.

## NOTES

1. If the research will be conducted abroad you will need to complete a Notification to Travel form. If you will be travelling to a high risk destination you may need to complete a risk identification form and a risk assessment form. Please see: https://info.lse.ac.uk/staff/divisions/Risk-and-Compliance-Unit/Health-and-Safety/Fieldwork-overseas-travel-and-off-site-activities. Note that if the location or nature of the research presents a high degree of risk, the Research Ethics Committee may check with the Health and Safety team that a risk assessment is underway.

2. If you have not already done so, please complete a Data Management Plan (DMP). We recommend using the templates provided on DMPonline: https://dmponline.dcc.ac.uk/ Guidance on writing a DMP and using DMPonline can be found on the Library webpages at: http://www.lse.ac.uk/Library/Research-support/Research-Data-Management/What-is-a-Data-Management-Plan-and-how-do-I-write-one Unless you have a research funder that is listed, selected the generic DMP option. Please submit your completed DMPs to the Data Librarian on Datalibrary@lse.ac.uk

3. If your research involves participants identified from, or because of, their status as patients of the NHS or other health services of the UK Devolved Administrations, and/or the relatives of such patients then it will most likely fall under the remit of the Health Research Authority; similarly, social care research involving adults children or families and some proposals for social science studies situated in the NHS will fall under the remit of the Social Care Research Ethics Committee. There is an easy-to-use tool to help you ascertain whether or not you need HRA approval or not at: http://www.hra-decisiontools.org.uk/ethics/ For further guidance see: http://www.hra.nhs.uk/research-community/before-you-apply/determine-which-review-body-approvals-are-required/

4. Under the Mental Capacity Act 2005, research involving adults aged 16 or over with learning difficulties or who otherwise 'lack capacity' will be subject to approval by an NHS REC if that research is deemed to be 'intrusive'. For guidance see:
http://www.hra.nhs.uk/resources/research-legislation-and-governance/questions-and-answers-mental-capacity-act-2005/

5. Please refer to the LSE guidance on Informed Consent (which includes a sample template) here: *http://www.lse.ac.uk/intranet/LSEServices/policies/pdfs/school/infCon.pdf*. Note that if you will **not** be obtaining **written** consent then your ethics application will need to be submitted to the Research Ethics Committee for review.

6. Please note that we follow the ESRC definition of vulnerability which is as follows: 'Vulnerability may be defined in different ways and may arise as a result of being in an abusive relationship, vulnerability due to age, potential marginalisation, disability, and due to disadvantageous power relationships within personal and professional roles. Participants may not be conventionally 'vulnerable', but may be in a dependent relationship that means they can feel coerced or pressured into taking part, so extra care is needed to ensure their participation is truly voluntary.' https://esrc.ukri.org/funding/guidance-for-applicants/research-ethics/frequently-raised-topics/research-with-potentially-vulnerable-people/
Please also note that as general guidance, research participants under the age of 18 may be vulnerable. If your research will involve children or other potentially vulnerable participants please refer to the LSE Safeguarding policy at:
https://info.lse.ac.uk/staff/services/Policies-and-procedures/Assets/Documents/safPol.pdf
Also, see Note 4 above regarding the Mental Capacity Act.

7. Deception can occur at a variety of levels: for example, at one level, experimental methods may depend on participants being deliberately misled as to the true nature or purpose of the research in which they are taking part; at another, covert participant observation may entail an implicit deception as to the true identity and role of the researcher. Deception may be a legitimate and necessary feature of social scientific research, but its use must always be properly justified. Any research involving deception must be submitted to the LSE Research Ethics Committee for review.

8. Please refer to the School's guidance on Data Protection and research:
https://info.lse.ac.uk/staff/services/Policies-and-procedures/Assets/Documents/datProRes.pdf

9. Where staff or students are planning research projects that will entail accessing security-sensitive material, it is important we ensure that the necessary safeguards are in place to protect both the researcher and the School. Even where there are no ethical issues raised by the research (inasmuch that there are no human participants) it is very important that we have a log of any such research so that students or staff do not run the risk of being wrongly accused of accessing such materials for other/non-research reasons. If your research will involve accessing such material please email research.ethics@lse.ac.uk

10. Applications relating to the following kinds of research should always be subject to review by the Research Ethics Committee:

(i) Research involving deception of participants, or that is intentionally conducted without their full and informed consent at the time the study is carried out or when the data are gathered
(ii) Research which involves or may lead to the publication of confidential information
(iii) Research where informed consent will be obtained orally but not in writing[14]
(iv) Research involving any of the following: vulnerable groups; sensitive topics; groups where permission of a gatekeeper is normally required for initial access to members (where involvement of the gatekeeper might raise issues of whether participants' involvement is truly voluntary); research which would induce undue psychological stress, anxiety or humiliation or cause more than minimal pain.
(v) Research involving more than minimal risk of harm (whether emotional or physical) to the researcher(s)

[14] Staff and students in the Anthropology department who will not be obtaining written consent may use their departmental ethics review procedure.

# Annex C: Flowchart of the LSE research ethics review process[15]

**Does the research project involve human participants or personal data that could identify a living individual[16]?**

YES

No

**No ethics review required**
But DMP recommmended. See below

**Research Ethics Review process**

i) Access the ethics review form at: www.lse.ac.uk/intranet/LSEServices/policies/pdfs/school/resEthPolProForm.docx Part I of the form is a 'Checklist', designed to help researchers think through whether or not their proposed research raises any significant ethical issues. If your answers are all 'No', then most likely there are no significant ethical issues raised by your research. However, if some answers are 'Yes' or 'Not certain' then you should complete part III of the form, the Questionnaire.

ii) If you will be collecting data from participants (e.g. via interviews, focus groups, surveys, observation, etc.) you will need to draw up a Participant Information Sheet and Consent form. Please refer to the guidance (which includes a sample template) here: http://www.lse.ac.uk/intranet/LSEServices/policies/pdfs/school/infCon.pdf Students should discuss their completed ethics review form and draft Participant Information Sheet and Consent form with their supervisors.

iii) If the supervisor and/or relevant departmental approver agrees that there are no significant ethical issues then you and they can sign Part II of the review form, **Departmental Certification'**. The form then needs to be filed in your department and no further action is required.

iv) If, however, the research raises more than minimal ethical issues (or involves certain features – please refer to §13 of the Research Ethics Policy above) you should send the completed form (including Part III) and your informed consent documents to research.ethics@lse.ac.uk for **review by the Research Ethics Committee**.

**Amendments:** If your study design changes you may need to complete/update your ethics review form. Contact your supervisor or research.ethics@lse.ac.uk for advice.

**Other requirements**

**Data Management Plans (DMPs):** we recommend all researchers complete a DMP (for funded research it is a requirement). There are easy to use templates (customised for LSE) available at: https://dmponline.dcc.ac.uk/ You will need to create an account, but it's very quick to do and you can use your LSE login credentials. Completed DMPs should be sent to: Datalibrary@lse.ac.uk who will respond with any comments and advice.

**Travel:** If you are conducting research overseas you must complete a 'Notification to Travel' form, and check whether any risk assessment is required for the location in question. Guidance can be found at: https://info.lse.ac.uk/staff/divisions/Risk-and-Compliance-Unit/Health-and-Safety/Fieldwork-overseas-travel-and-off-site-activities

**If your research may undergo ethics review elsewhere…**

Duplication of ethics reviews will be avoided where possible. If your research will undergo ethical review elsewhere (for example, if you are collaborating with another university, or if the research requires NHS Research Ethics Committee approval), contact the research ethics manager via research.ethics@lse.ac.uk to ascertain whether or not LSE research ethics review/approval is required or not.

[15] Some departments may use alternative internal documentation or procedures so please check with your department first. However, note that if Research Ethics Committee approval is sought or required, a completed Ethics Review Questionnaire, as described above, will need to be completed and submitted.

[16] Note that this could include, for instance, social media user/profile names.

## Review schedule

| Review interval | Next review due by | Next review start |
|---|---|---|
| November 2014 | October 2017 | February 2017 |

## Version history

| Version | Date | Approved by | Notes |
|---|---|---|---|
| Nov 14 | Nov 2014 | REC, RC | Completed review of policy plus annexes A, B and C |
| annexB2016_v4 | Nov 2016 | REC Chair | Minor amendment of wording to Q6 (re DMP) in Annex B |
| annexB_v5 | Oct 2017 | RC Chair | Updated web links; small change to fieldwork/risk assessment wording; sentence added to start of Part II re circumstances where Self-certification of ethics review is not appropriate |
| v8 | Dec 2018 | REC, RC | Changes to Self-certification process; revised policy and annexes |

## Contacts

| Position | Name | Email | Notes |
|---|---|---|---|
| Research Governance Manager | Lyn Grove | l.grove@lse.ac.uk | Author |

## Communications and Training

| | |
|---|---|
| Will this document be publicised through Internal Communications? | **Yes** |
| Will training needs arise from this policy | **Possibly** |
| Staff and students should contact research.ethics@lse.ac.uk regarding any training needs | |