

Research Ethics Policy and Procedures

Statement of Principles

1. The Research Ethics Policy forms a part of the School's over-arching Ethics Code¹.
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 participants², or involving data relating to directly identifiable human subjects (whether living or recently deceased), conducted by researchers³. 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 review

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. The purpose of the review 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 (as well as to the researcher(s) themselves).
8. Researchers should refer to the guidance and instructions as to how to complete the online ethics review form which can be found [here](#). **Low risk** applications are reviewed/approved at Departmental/Centre level (**'Departmental Certification'**) by either the supervisor (for student applications), or by the faculty approver (for staff applications). **Higher risk** applications are reviewed/approved by the **Research Ethics Committee**. Ethics review applications are automatically routed to either the Departmental or REC review process. In the case of student applications which are higher risk, the supervisor will review the application prior to submitting it to the Research Ethics Committee.
9. Higher risk applications, requiring review/approval by the Research Ethics Committee, are deemed to be those where the research:
- Will involve vulnerable groups⁴ or sensitive topics⁵
 - Might induce emotional or psychological stress, anxiety or humiliation
 - Involves deception of participants or that is intentionally conducted without their full and informed consent at the time the study is carried out
 - Might have negative repercussions for any individuals or groups
 - Requires permission of a gatekeeper for initial access to participants (where involvement of the gatekeeper might raise issues of whether participants' involvement is truly voluntary);
 - Will involve more than minimal risk of harm (whether emotional or physical) to the participants or the researcher(s)
- Or where:
- The researcher will obtain consent orally but not in writing⁶

⁴ 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/>

⁵ 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

⁶ This alone does not require REC review for researchers in the Anthropology department.

- External obligations (e.g. funder requirements, data access requirements) require approval by the Research Ethics Committee
10. If your research may be subject to ethics review by an external body, please refer to section 13 below.
 11. Any queries regarding the ethics review procedure should be directed to the Research Governance Manager in the first instance (via research.ethics@lse.ac.uk).
 12. 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.
 13. 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 Committees⁷, or the Research Ethics Committees of another university). In these cases the researcher should provide details of the external review body in the relevant section of the online ethics review form. The researcher will receive confirmation via Research Governance Manager as to whether or not LSE ethics review/approval is also required. The researcher will be asked to submit a copy of the letter of approval from the relevant review body. Notwithstanding the principle of avoiding duplication, if deemed appropriate the LSE Research Ethics Committee will consider the ethical implications of the research in its own right (regardless of whether approval has already been granted externally).
 14. 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 funder⁸. Researchers should incorporate an appropriate lead-time into the planning of their research to allow for the ethics review process. 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>
 15. The Research Ethics Committee may undertake an expedited review (where the review is carried out by the Chair or Deputy 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.
 16. 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
 17. 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

⁷ 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.

⁸ 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.

decision will be kept on file for a period of at least seven years or for the duration of the project (whichever is longer).

18. 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. See section 34 below.

Informed consent

19. 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 (which includes a sample template)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 Policy¹⁰.
20. 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

21. 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.
22. 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.

Research conducted outside the UK

23. 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 place¹¹.

⁹ <https://info.lse.ac.uk/staff/services/Policies-and-procedures/Assets/Documents/infCon.pdf>

¹⁰ <https://info.lse.ac.uk/staff/services/Policies-and-procedures/Assets/Documents/safPol.pdf>

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>

24. 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

25. 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).
26. Where appropriate, researchers must submit to a Disclosure and Barring Service check (for link see Annex A).
27. 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.
28. 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

29. 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 Authority¹³. 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 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

30. 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

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/>

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.

31. 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.
32. 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.
33. 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.

Appeals procedure

34. As stated in §18 above, 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.
35. 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.
36. 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.
37. All members of the Panel must be fully apprised of and familiar with the School's Research Ethics Policy.
38. 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.
39. 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

40. 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.
41. The Research Ethics Committee will periodically conduct a selective audit of current research projects.
42. 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.
43. 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

44. 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-notice-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.

<https://www.ukri.org/files/legacy/reviews/grc/rcuk-grp-policy-and-guidelines-updated-apr-17-2-pdf/>

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)
<https://info.lse.ac.uk/staff/services/Policies-and-procedures/Assets/Documents/codResCon.pdf>

Data Protection and Research

<https://info.lse.ac.uk/staff/services/Policies-and-procedures/Assets/Documents/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:

<https://info.lse.ac.uk/staff/services/Policies-and-procedures/Assets/Documents/ethCod.pdf>

Freedom of Information (Fol) obligations. The LSE is obliged to meet the requirements of the Fol 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:

<https://info.lse.ac.uk/staff/services/Policies-and-procedures/Assets/Documents/infSecPol.pdf>

Informed consent: The School's guidance on informed consent (including a sample Information Sheet and Consent form template) can be found at:

<https://info.lse.ac.uk/staff/services/Policies-and-procedures/Assets/Documents/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>

Review schedule

Review interval	Next review due by	Next review start
November 2014	January 2021	October 2020

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
v9	August 2020		Updated ethics review procedure to align with online ethics review submission system; removal of Annex B (the previous ethics review from) and Annex C (the previous flowchart)
V9(i)	September 2020	Research Governance Manager	Re-insertion of a couple of missing footnotes

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	