

# Research and Knowledge Exchange Ethics Policy



## Related Documents:

<https://www.westminster.ac.uk/research/research-governance/research-strategies-and-policies>

## Read in conjunction with:

1. [Research Ethics Governance Framework and Researcher Ethics Guidance](#)
2. [Code of Research Good Practice](#)
3. [Procedure for Managing Allegations of Research Misconduct – staff](#)
4. [Regulations for Managing Allegations of Research Misconduct – students](#)
5. [Research Misconduct webpage: including 'Public Interest Disclosure Policy'](#)

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## 1 Introduction

As articulated in our [Research and Knowledge Exchange Strategy](#) the University will maintain a robust and progressive commitment to ensuring the highest standards of rigour and integrity in all aspects of its \*research and KE activities and partnerships (herein referred to as research). This includes the University's commitments to the [Concordat to Support Research Integrity](#) in ensuring that research is conducted according to appropriate ethical, legal and professional frameworks, obligations and standards.

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***“As a multi-faceted university, we are host to a wide range of exciting and important research projects that are impactful both in societal, cultural and academic contexts. It is thus vitally important that we attend to the ethical aspects of those projects to ensure that we maintain care for participants, stakeholders, researchers and the research itself. UREC oversees this work, working in partnership with researchers and governance bodies within the University. We are committed to ensuring a robust set of processes, but mindful that these should not needlessly delay or disrupt time-sensitive research. This policy seeks to attend to these concerns so that we remain leaders in the research fields the University represents.”***

**Professor Catherine Dormor**, Chair of the University Research and Knowledge Exchange Ethics Committee (UREC), and Head of Westminster School of Arts

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## 2. Purpose

The purpose of this Policy is to highlight the research ethics principles which inform the entire research life-cycle and are an integral part of the research itself. The principles also inform the guidance and processes (Research Ethics Guidance) for ensuring research is carried out to the highest standards in ethical practice. Together this Policy and the processes, guidance, development, training and advice available, further strengthens the work of the University in supporting a research environment that is underpinned by a culture of integrity and based on good governance, best practice and support for the development of researchers.

Ethical research not only seeks to minimise risks of harm and increase benefits to participants and others, including the protection of the environment, culture and cultural heritage of groups and communities, but also enhances the quality of the research as a whole.

## 3. Scope

Applies to all fields of research and all disciplines. The Policy applies to all University staff colleagues and students, visiting researchers, and those that collaborate with the University in its research endeavours.

The Policy applies to the entire research life-cycle, defined by [UK Research Innovation \(ESRC\)](#) with regard to active ethical consideration, as including during and within: *the planning and research design stage, the period of funding for the project, and all activities that relate to the project up to, and including, the time when funding has ended. This includes knowledge exchange and impact activities, the dissemination process – including reporting and publication – and the archiving, future use, sharing and linking of data.* Noting that the same principle applies to non-funded research as a sector norm and obligation.

The scope of this policy does not include gifts/donations or University investments, covered elsewhere in the [Donor and Sponsor Relations Policy](#).

## 4. Principles

The University's research ethics principles support the [Research and Knowledge Exchange Strategy's](#) vision to *ensure that our commitment to equity, diversity and inclusion is at the core of how we engage with everyone from their first interactions with us and throughout our work together.*

### Principles of RKE Ethical considerations

Ethical considerations in research include balancing potential risks against potential benefits, in order to avoid or reduce any potential risks of harm. Two important terms to consider are beneficence (doing and promoting good) and non-maleficence (doing no harm). The University's *Research Ethics Policy* and *Guidance* reflect developments in research ethics principles to apply to all disciplines of research and all types of research, which may not be directly linked with human or animal participation. This Policy and Guidance are based on sector best practice, taken from international and national guidance around research ethics and its considerations. The University is an active member of the UK's research integrity advisory body (UK Research Integrity Office) and contributes to best practice, as well as applying it to our own framework. Our research ethics principles are as follows:

- **Respect for persons**  
*Respect for persons incorporates at least two ethical convictions: first, that individuals should be treated as autonomous agents, and second, that persons with diminished autonomy are entitled to protection.*
- **Beneficence and non-maleficence**  
*Persons are treated in an ethical manner not only by having their decisions respected and being protected from harm, but also by efforts being made to secure their well-being.*
- **Distributive justice (ensuring benefits and burdens are shared equitably)**  
*An injustice occurs when some benefit to which a person is entitled is denied without good reason or when some burden is imposed unduly. Another way of conceiving the principle of justice is that equals ought to be treated equally.*

All researchers must apply these principles to their research from inception through to dissemination and impact generation activities, regardless of whether ethics review is required. This should be documented by researchers as a *self-assessment* of their considerations. These must be revisited regularly and updated for review as necessary. In order to apply these principles, the following considerations should occur:

- ethics self-assessment or application for ethics review, with sound and peer reviewed design and methodology, including expert advice where necessary
- the selection criteria and recruitment (of potential participants)
- Valid and appropriate consent considerations (of potential participants)
- Risk/benefit assessment considerations
- the integrity of the environment
- the protection of cultures and cultural heritage, including but not limited to sites or objects of historical importance.
- respect for animals
- following their own professional and legal obligations and being aware of these and seeking advice from the Research and Knowledge Exchange Office (RKEO) as necessary
- independence of research should be maintained and where conflicts of interest cannot be avoided, they should be made explicit.
- research should be conducted with integrity and transparency.

Researchers should refer to the [Research Ethics Guidance](#) for further information on areas they need advice on. All researchers can discuss ethics issues with the CREC representatives throughout the research life cycle and receive governance related advice from the Research and Knowledge Exchange Office (RKEO) and other professional support teams.

Researchers should be aware and familiar with the wider research and knowledge exchange framework at the University, including the [Code of Research Good Practice](#) and the [Procedure and Regulations for Managing Allegations of Potential Misconduct](#). Related documents are listed above and should be referred to regularly.

## 5. Responsibilities and accountabilities

The University expects all those engaged in any research activity, including its academic employees, doctoral researchers, postgraduate students, visiting researchers, and in addition any other staff undertaking research on behalf of the University, to observe these principles.

Supervisors act as Principal Investigators for taught student *ethics self-assessments* and *applications for ethics review*. The Director of Studies acts as Chief Investigator for doctoral researcher *ethics self-assessments* or *applications for review*, and the doctoral researcher acts as Principal Investigator.

Staff principal investigators are responsible for all aspects of the research including research ethics.

Heads of College, Heads of School, College and School Research and KE leads all play a role in disseminating good research practice, including application of these ethics principles.

Research which requires ethics review must not go ahead without an ethics review favourable opinion (this may be staged to allow certain aspects of work to go ahead). Doing so without ethics review favourable opinion is potentially questionable research practice or research misconduct. Additional legal or compliance issues would still require permission to proceed, regardless of receipt of ethics favourable opinion, authorised by the relevant University colleague or team operating as an institutional authoriser. Going ahead without permission could lead to potentially questionable research practice or research misconduct and/or illegal activity.

Under no circumstances will ethics review occur retrospectively, and applicants for self-assessment or review will be required to explicitly state via the VRE forms that they have not carried out any work with ethical implications, which is not covered by existing and non-expired favourable opinion.

The University provides support through its research ethics governance structure and the experts supporting this including ethics reviewers, newsletters, workshops, the researcher development programme and Hub, as well as the *Introduction to Research Ethics* online module. Dedicated guidance for researchers and ethics reviewers is provided in the *Research Ethics Guidance*. The University employs an online research governance and ethics management and review system, the Virtual Research Environment, providing transparency to researchers on the status of their application for review. It acts as an auditable system for all research ethics considerations from researchers at all levels. The system handles both governance and ethics aspects through a single application form and contains useful guidance for applicants within the system.

## 6. Legal framework impacting research ethics:

Research ethics is impacted by a number of legislative and regulatory requirements, as well as



internal or external policy compliance, some of which are listed here:

Equality Act 2010  
Mental Capacity Act 2005  
Health and Safety at Work Act 1974  
Human Tissue Act 2004  
Animals (Scientific Procedures) Act 1986 (amended 2012)  
Data Protection Act 1998, 2018  
Misuse of Drugs Act 1971 (MDA) and the Misuse of Drugs Regulations 2001 (MDR)  
Counter-Terrorism and Security Act 2015  
National Security and Investment Act 2023  
European Union draft Artificial Intelligence Act

Research is also governed by a number of authorities and regulators including the Department of Health and Social Care (Health Research Authority), UK Health Security Agency, Human Tissue Authority, Ministry of Defence, Ministry of Justice, His Majesty's Prisons and Probation Services and the Home Office.

Where there is a cross-over between University governance matters, compliance issues and research ethics, University Research Governance and Compliance checks will occur as well as an ethics review. Some research may have very little or no ethical implications but may have governance related obligations which would mean only a Governance and Compliance review or check will occur. This process for routing a review is managed via the VRE System. See *Research Ethics Guidance*.

## 7. International research

When carrying out research with global dimensions, the University **also** expects its researchers to act with fairness, respect, care and honesty, with extra mitigations for avoiding any risk of harms to local populations (human or animal), environments, natural habitats, resources, and cultures, particularly in resource poor settings. The University researchers and those working with them will respect local cultures, and where appropriate seek additional local ethics review/favourable opinion in addition to that from the University. The University's researchers are amongst the most diverse communities of researchers in the world.

Where researchers or research ethics reviewers require advice about working with certain individuals, organisations or jurisdictions, they should seek advice from the Head of School and RKEO.

## 8. Ethics Guidance

Consideration and reflection around ethical dimensions of research is an ongoing exercise, and guidance alone cannot replace experiential or hypothetical application of ethical principles to research and knowledge exchange issues. All researchers and those reviewing research or supporting researchers are encouraged to self-reflect and carry out peer conversations around ethical issues, seek expert advice, be knowledgeable and current about the own professional obligations and requirements for their discipline, form ethics advisory groups, and actively seek participant or collaborator inclusion in the research itself. Research ethics and the legislation surrounding research is constantly evolving and developing, and therefore researchers need to keep up to date with these developments, and should be supported by their managers, Supervisors, leaders, and the University in doing so.

The University has developed the *Research Ethics Guidance* to support researchers and reviewers, this includes through standard processes and guidance documents. The processes used by ethics reviewers are also provided to all researchers through the *Research Ethics Guidance* document, to help researchers secure a favourable ethical opinion, **provide transparency of details around the remit of review of the [University's Research Ethics and Knowledge Exchange Committees \(RECs\)](#)**.

The *Guidance* document also contains an easily navigable index for the area researchers need help with, and it is available on the [Researcher Development Hub](#), where students can access it directly.

## 9. Research Ethics Governance

The University's Research Ethics governance is carried out within a broader set of institutional policies, including for research integrity (research good practice), researcher development and research governance.

The University has an ethics governance structure, with ethics review primarily devolved to *College Research and Knowledge Exchange Ethics Committees (CRECs)*. The role of the *CRECs* is wholly concerned with the review of proposals and their ethical soundness i.e. they are ethics review bodies. They do not provide 'approval' nor 'permission to proceed', rather they provide an opinion on whether the research is deemed as ethically sound, e.g. a favourable opinion.

The *CRECs* terms of reference specifically state that the *CREC* will:

*Ensure that all decisions of the Committee consider cultural sensitivities and support the University's commitments to equity and inclusivity and that they will promote a culture of ethical research and knowledge exchange and provide advice to the UREC on matters relating to ethical review if requested.*

The *CRECs* are accountable to the *University Research and Knowledge Exchange Ethics Committee (UREC)* which oversees the University's research ethics structure and review process, policies, and training needs around research ethics. The *UREC* only reviews certain work involving external research governance issues, or research which is deemed to have the potential for a significant risk of harm or reputational risk.

The following core principles relate specifically to the conduct of research ethics committees rather than the ethics of the research which they are designed to review; independence, competence, facilitation, transparency and accountability:

### 1. INDEPENDENCE

*All institutional processes supporting best practice in research ethics, including formal and informal reviews, training and support, must operate free from conflicts of interest so that the application of ethics principles and reasoning is neither impeded nor compromised.*

This is upheld, through multi-disciplinary *CRECs*, which include members external to the School research being reviewed, and where possible members external to the University. The *CREC* Terms of Reference and Membership composition allows for properly constituted *CRECs* which can make informed decisions and expert decisions around ethical implications. The *CRECs* regardless of any representation external to the University maintain objectivity and avoid bias and conflicts of interest, as a core principle at the heart of their operations.

The *CRECs* report to *UREC*, acting as an overarching policy body which has oversight for the maintenance of consistent research ethics standards, monitors performance and provides a means to manage appeals against *CREC* decisions.

The *CRECs* operate only to consideration of ethics in research proposals, and not issues of University governance, legal or internal compliance, nor institutional reputational risk concerns.

The *UREC* is not entirely independent from the University, in that it considers issues of reputational risk of harm, including to the researcher as well as University and work with significant governance dimensions.

## 2. COMPETENCE

*Ethics review and other processes supporting institutional best practice and sector standards must be consistent, coherent and well-informed.*

This principle is upheld by ensuring CRECs includes ethics expertise for the range of disciplines the CREC reviews. The University provides a work-load allocation model for CREC chairs, and Colleges may provide this for members if appropriate. The University recognises that research ethics preparations by researchers are an integral and important part of their research itself.

The UREC draws on current national and international developments for the management of research ethics training and support for its CREC members, ad-hoc ethics reviewers and researchers.

The UREC is committed to regular review of its research ethics processes, and to providing standard and consistent processes for application by researchers and CRECs across the University.

The UREC is also committed to providing regular training for CREC/UREC members and others providing research ethics support to ensure adequate expertise for supporting new and emerging research areas.

## 3. FACILITATION

*Ethics review and other supporting processes must make the facilitation of ethically sound research a priority. This will be evidenced by researchers viewing engagement with institutional research ethics processes as positive and valuable for all phases of their research.*

The UREC seeks to provide guidance and training for researchers in ethics issues and in the policies and mechanics of ethics review, seeking to develop researchers' autonomy and skills in making reasoned ethics judgments. The University's Introduction to Research Ethics online module is designed for all researchers to undertake on a voluntary basis and the CREC members and ad hoc ethics reviewers are mandated to undertake this as part of their role.

The CRECs provide efficient review with clear timescales, with appropriate analysis of risks of harm and in proportionality.

The CRECs are motivated by an endeavour to give favourable opinions to ethical research through the provision of advice to researchers, aiming to ensure that a favourable opinion is secured, their opinions must include appropriate positive feedback as well as any necessary constructive criticisms. They should be transparent and accessible, justify opinions, providing clear rationales.

The UREC provides guidance documents for ease of access by all researchers and reviewers, including for participant information and consent purposes. The CRECs and UREC are available for advice and support to researchers, throughout the research life cycle.

The University encourages researchers to include the cost of preparation for ethics review when seeking funding.

## 4. TRANSPARENCY AND ACCOUNTABILITY

*Decisions and advice by RECs must be open to public scrutiny and responsibilities must be recognised and discharged consistently.*

This is upheld by ensuring that CRECs provide regular reports to the overarching policy body, UREC, at least once a year, evidencing CREC performance in responding to applications for formal ethics review, including data such as the number and types of opinions given and the average time taken to complete reviews. CRECs should include information in their annual report around trends, concerns, training needs identified in the College for researchers and/or reviewers. In turn the UREC will conduct audits of the decision-making CRECs of approved and not approved applications to identify any issues or needs for further training.



The University published its Research Ethics Policy and Guidance publicly as well as the UREC and CREC Terms of Reference. The University has a single point of contact for research integrity enquiries published on its public research website, as well as a named contact for any allegations of suspected potential misconduct.

The University guides researchers to provide an independent point of contact for participant complaints which is not a member of the research team, and should not have a conflict of interest with the research itself, i.e. Head of College or School.

## 10. Research Ethics Reviewer Decision Appeals

See Research Ethics Appeals Procedure (within Research Ethics Governance Framework).

## 11. Contacts

See [Research and Knowledge Exchange Ethics website](#) for key contacts.

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