

**Code of Practice on
Research Integrity**

April 2022

governance
undergraduates

ethics
integrity
code of practice

PHD

researchers

students

governance
staff
research

PHD

Code of Practice on Research Integrity

Version no.	Status	Revisions	Lead Author
1.1	Approved by Academic Board, May 2013		Gráinne Barkess
2.0	Approved by University Research Integrity Committee, January 2016	Revisions to reflect dissolution of faculties; additions of guidance notes approved by URIC during AY14/15; addition of a misconduct investigation procedure	Gráinne Barkess
3.0	Approved by University Research Integrity Committee, October 2018	Revisions to reflect change in data protection law, increased detail on authorship	Gráinne Barkess
4.0	Approved by University Research Integrity Committee, April 2022	Revisions to reflect changes in approved survey software, guidance on payment of participants and external participation requests, changes to reflect sector guidance regarding data protection and safeguarding	Lindsay Ramage

This document supersedes any codes of practice on research integrity written before 2022.

Contents

Section 1

Introduction..... 7

Section 2

Guiding principles for research at Edinburgh Napier University..... 8

Section 3

Research should not cause harm to participants or researchers, and preferably it should benefit society 9

Section 4

Potential participants normally have the right to receive clearly communicated information from the researcher in advance 10

Section 5

Participants should be free from coercion of any kind and should not be pressured in a study 11

Section 6

Participants in a research study have the right to give their informed consent before participating 12

Section 7

Honesty should be central to the relationship between researchers, participants and other interested parties 14

Section 8

Participant’s confidentiality and anonymity should be maintained 15

Section 9

The use of research data should adhere to our Research Data Management policy and the Data Protection Act 2018 16

Section 10

Researchers have a duty to disseminate their research findings to all appropriate parties..... 17

Section 11

Researchers should take responsibility for their contributions to all publications, reports and other representations of their research..... 18

Section 12

Researchers should report any suspected misconduct to the appropriate authorities 19

Research Guidance Note 1

Definitions of research, knowledge exchange and researchers..... 20
 Research 20
 Knowledge Exchange..... 20
 Researchers 20

Research Guidance Note 2

Research Ethics & Governance Structures 21
 Governance structures 21
 Cross-University Ethical Approval Procedure..... 21
 School Ethics, Structures and Policies 22
 The Role of ‘Gatekeepers’ 23
 Ethical Approval Appeals Process..... 24

Research Guidance Note 3

Informed consent..... 25
 Gaining informed consent..... 25
 Information is key to ‘informed’ consent 25
 Gaining consent is a process 26
 Research in public contexts..... 27
 Example of a consent form..... 28
 Example of a consent form for use with children and young people..... 30

Research Guidance Note 4

Online survey tools 31
 Anonymity for participants should be considered a priority and the confidentiality of the participant should be respected..... 31
 Informed consent must be demonstrated 31

The researcher has a responsibility to alert the participant to the point at which they may withdraw, after which all data will be fully anonymised and therefore untraceable.....	31
University approved online survey software	32
Roles and responsibilities for using NOVI and MS Forms	32
Availability of NOVI.....	32
Requesting access to NOVI	33
Availability of MS Forms	33
Limitations on survey use	33
Assuring adherence to guidelines for research involving human subjects.....	33
Terms of use	34
Misuse of the survey applications.....	34
 Research Guidance Note 5	
Research involving vulnerable groups.....	35
Potentially vulnerable groups	35
Working with children and young people	36
Protecting Vulnerable Groups (PVG) Scheme	36
 Research Guidance Note 6	
Confidentiality, anonymity and data protection	37
Confidentiality and anonymity.....	37
Data Protection Legislation.....	38
What to consider when using personal data for research.....	38
 Research Guidance Note 7	
Research misconduct	40
 Research Guidance Note 8	
Research conducted outside the UK	41
Taught overseas programmes containing research projects	41
Research conducted overseas by UK based staff and students	41
 Research Guidance Note 9	
Research versus evaluation activities.....	43
Introduction.....	43
What is research?.....	43

What is evaluation?	44
Key differences between research and evaluation	44
Academic publication.....	45
Ethical conduct is required for both research and evaluation activities.....	46
Assessing the risks to participants, researchers and society.....	46
Adopting a risk analysis approach to ethical approval for evaluation activity.....	47
Seek advice from experienced staff and professional bodies.....	47
 Research Guidance Note 10	
Internet-mediated Research	50
What are the ethical issues in internet-mediated research?	50
Informed Consent can be more challenging to obtain in online settings.....	50
Participation in the research	51
Confidentiality	51
Where are the human subjects in the research data?	51
Reliability of data	52
Secondary data and information online	52
What guidance is there?	52
 Research Guidance Note 11	
External Requests for Participation	54
Have the following been considered?.....	54
Governance protocol	54
Recruiting participants.....	55
School conditions	55

Section 1

Introduction

This Edinburgh Napier University Code of Practice on Research Integrity defines and details the research principles and practices to which all students and staff at the University are required to adhere. The Code was ratified for this purpose by the Academic Board on May 2013. The Code underpins the University's commitment to promoting high standards of ethical practice by all those undertaking research.

Any Code of Practice on Research Integrity must be meaningful and relevant to researchers and be accepted by them. To this end, the Code of Practice is supported by a number of research guidance notes that help support researchers in turning the guiding principles within this document into practice that underpins the research carried out by the University.

We encourage both our staff and students to be ethically aware, self-reflective researchers who take responsibility for embedding the principles within this code into their day-to-day research practices.

As a University, we commit to the principles laid out in the ['Concordat to Support Research Integrity'](#) as well as the ['Singapore Statement on Research Integrity'](#).

Section 2

Guiding principles for research at Edinburgh Napier University

All research within the University should be conducted with:

- honesty
- rigour
- transparency and open communication
- care and respect
- accountability.

The guiding principles of this Code of Practice are the ethical imperatives of **do no harm** (non-maleficence) and **do good** (beneficence).

Researchers must weigh up — and reach a rational judgement on — the potentially conflicting risks and benefits of a particular piece of research in terms of the principles above.

Ethical research conduct does not require the avoidance of potentially high-risk research. Proper recognition of risks and responsible management of them are required for an ethical approach. Ethical research is therefore a matter of being risk aware, not risk averse.

Researchers are expected to comply with the ethical, legal and professional frameworks, obligations and standards as required by statutory and regulatory authorities, and by employers, funders and other relevant stakeholders.

The following standards have been developed to guide staff and students undertaking research. They are intended to cover general principles, but they may not address all situations and the researcher should seek further advice from their local 'gatekeeper', the School or University Research Integrity Committee and their profession's Code of Practice for Research Ethics as appropriate. For further information on 'gatekeepers' see [Research Guidance Note 2](#).

Training is available on various aspects of the standards of behaviours it expects from its staff, students and any associated personnel engaged in research and innovation activities and is available through this Code of Practice, Moodle site, University training events (HR connect) and from the School Integrity Committees.

Section 3

Research should not cause harm to participants or researchers, and preferably it should benefit society

Any potential risks such as physical, social or psychological distress to participants and researchers, whether directly or indirectly involved, which might arise in the course of the research should be identified.

This should include potential safeguarding risks for the participants and research team such as sexual exploitation, abuse and harassment, bullying, psychological abuse and physical violence for all individuals that are employed on, participate in or otherwise come into contact with the research and innovation activity.

Procedures must be justified, explaining why alternative approaches involving less risk cannot be used.

The potential benefits of the research must be clearly stated but not overestimated.

Any cultural, religious, political, social, gender or other differences in a research population should be sensitively and appropriately handled by researchers at all stages of the research.

Section 4

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

Most research procedures should be explained on an information sheet written in simple language that is easily comprehensible by any potential research participant.

When a research protocol is being developed a privacy impact assessment should be performed. This should identify any personal data, how this will be handled with integrity, and how the study complies with data protection legislation. This information will then inform the content of the participant information sheet and consent form. The Privacy notice must be available to participants at the time of consent. This can be embedded in the participant information sheet or available as a link to an online version.

If personal data is obtained from a source other than the individual it relates to, we provide them with privacy information:

- within a reasonable of period of obtaining the personal data and no later than one month;
- if we plan to communicate with the individual, at the latest, when the first communication takes place; or
- if we plan to disclose the data to someone else, at the latest, when the data is disclosed.

The information sheet should set out the purpose of the investigation; the procedures; who will have access to the data; the risks; the benefits or absence of them to the individual or to others in the future or to society; a statement that participants may decline to participate; ways to withdraw from the research; an invitation to ask questions and contact details for the researchers. More information can be found in [Research Guidance Note 3](#).

Participants should be given plenty of time to study the information sheet and to ask questions from relevant parties as needed and provided with a copy of the sheet. The information sheet and the consent form (see [Research Guidance Note 3](#) for examples) should form part of any application for ethics approval.

Researchers should maintain records of consent to participate. Note – this will count as processing personal data.

Section 5

Participants should be free from coercion of any kind and should not be pressured in a study

Inducements, such as special services or financial payments (other than reimbursement for travel expenses or, in some cases, time) and the creation of inappropriate motivation should usually be avoided.

Risks involved in participation should be acceptable to participants, even in the absence of inducement.

Reimbursement of participants' expenses, for example travel expenses, is not payment in the sense of reward, and can be provided.

In some instances, it may be justifiable to use techniques such as a free prize draw or book or gift vouchers to encourage survey responses. Respondents should not be required to do anything other than agree to participate or return a questionnaire to be eligible to enter a free prize draw. It should be clear that participants can enter the prize draw even if they do not answer the questions in the survey. Incentives should not be offered that require the respondent to spend money or which undermine other ethics considerations (such as anonymisation). If you are unsure whether or not it is appropriate to provide a prize draw as part of your survey, you should consult with your School Integrity Lead.

Researchers should consider the implications for the quality of consent from participants who are in a potentially dependent relationship with the researcher (for example, students, employees and patients). These groups may require careful consideration, as willingness to volunteer may be unduly influenced by the expectation of advantageous benefits or fear of consequences arising from not participating.

Section 6

Participants in a research study have the right to give their informed consent before participating

Participants should understand the purpose and nature of the study, what participation in the study requires, and what benefits are intended to result from the study.

Voluntary informed consent should usually be obtained in writing from any participant who is able to give consent. A copy of the consent form should be provided to each participant.

Participants must be given information on ways to withdraw from the study, along with information on when it may no longer be possible for their data to be removed (for example, after publication or after submitting an anonymous online survey response — see [Research Guidance Note 4](#)).

‘Consent to process’ may need to be obtained where information collected from individuals is to be used later for research purposes.

Participants should be made aware of their rights to exercise their [data rights](#) through the Privacy Notice. This includes the rights to subject access, erasure, rectification, cease processing, portability and restrict automated decision making for personal data processing. This is separate from research consent.

Research involving children under 18 years will usually require the informed consent of parents or other legal guardians. [Research Guidance Note 5](#) gives more information on working with vulnerable groups and outlines exceptions to gaining informed consent of parents.

Young persons of 16 years and over are generally thought to be able to give informed consent, but this will vary depending on the nature of the research and advice may need to be sought.

Where third parties such as school or care staff are affected by the research, consent should be obtained from these third parties.

Consent should be confirmed before the completion and return of any online survey questionnaires, removing the need for written consent.

[Research Guidance Note 4](#) outlines good practice in using online survey tools.

Individual consent may be unnecessary for some research activities, such as community research, which may be quite unobtrusive (for example, studies involving observation of public behaviour). Unobtrusive observation and the method used to record such research data may still carry risks which must be considered. Researchers are encouraged to seek advice from relevant 'gatekeepers' if they are considering this type of research. More information can be found in [Research Guidance Note 3](#).

Section 7

Honesty should be central to the relationship between researchers, participants and other interested parties

The use of covert research or deception of participants must be clearly justified and would require prior approval from the School or University Research Integrity Committee.

If covert research or deception is necessary, the reasons should be explained to participants after the study when appropriate.

Researchers should not actively deceive or passively mislead participants just because of an expectation that their prior permission will not be obtained.

Researchers must provide convincing reasons why such covert research should proceed without informants' proper consent, and how the likely benefits outweigh the lack of informed consent by research subjects.

The independence of research must be clear, and any conflicts of interest or partiality must be explicit.

Section 8

Participant's confidentiality and anonymity should be maintained

Researchers should take precautions to protect the confidentiality of participant's data; at both an individual level as well as at an organisational level (for example, a company's identity may also need to be protected).

The identity of participants should not be revealed unless their written permission is obtained in advance of the study commencing.

When personal identifiers are used in a study, researchers should explain why this is necessary and how confidentiality would be protected. Where possible, participants identified should have the right to view identifying information prior to its dissemination.

Researchers should be aware of the risks to anonymity, privacy and confidentiality posed by all kinds of information storage and processing, including computer and paper files, email records, photographic material, audio and videotapes, or any other information which directly identifies an individual. Further information can be found in [Research Guidance Note 6](#).

When considering conducting research that may raise issues of illegal activity or may cause professional harm, researchers must apply for approval from the School or University Research Integrity Committee.

Section 9

The use of research data should adhere to our Research Data Management policy and the Data Protection Act 2018

As research data is at the very core of evidencing research quality and integrity, it is vital that robust research data management policies and procedures are in place to ensure that research conducted by, and under the auspices of, Edinburgh Napier University meets the highest standards to comply with legislative, regulatory, audit, funding body, partner (stakeholder) and internal requirements.

Researchers should ensure they comply with Edinburgh Napier University's [Research Data Management Policy](#), are aware of [guidance and support](#), and comply with the university's [Data Protection Code of Practice](#) and associated guidance, particularly sections 5, 6, 7, 8, 11 and 20.

Participants must be informed of the kinds of personal information which will be collected, what will be done with it, and to whom it will be shared or disclosed. Under the Data Protection Act 2018 participants have the right to have their personal data redacted or deleted wherever possible. It is important the participants are aware of their rights and that measures are taken by the researcher to ensure the integrity of any data collected during research.

Researchers should be aware that when research is conducted across multiple sites/Organisation/Countries there will be increased policy and legislation requirements. This should be reflected in the data management and data protection documentation. Where data is shared between Countries checks should be made to understand any legal and information security risks before the work starts. Data sharing and processing agreements or additional clauses in collaboration agreements may be required.

Researchers should put in place methods of data disposal that ensures the principle that personal data is kept secure and meets the University's requirements for the [Safe Disposal of Confidential Waste](#).

Researchers should be aware that research data may be requested under Freedom of Information legislation. Researchers in this instance should seek advice from Governance Services as exemptions may apply.

Section 10

Researchers have a duty to disseminate their research findings to all appropriate parties

Researchers should share findings openly and promptly, as soon as they have had an opportunity to establish priority and ownership claims.

Edinburgh Napier has an [Open Access policy](#) which encourages researchers to make any publications open access through the 'green' open access route. Researchers must deposit publications in the repository. The sharing of open data is encouraged via repositories and is part of the open research agenda. This ensures compliance with HEFCE's [Open access policy for the Research Excellence Framework](#).

Researchers should consider any confidentiality agreements with funders or other stakeholders, or the need to protect data ahead of any patent applications when deciding on the timescale for dissemination of research findings.

Reports to the public should be clear and understandable, and accurately reflect the significance of the study.

Section 11

Researchers should take responsibility for their contributions to all publications, reports and other representations of their research

Lists of authors should include all those, and only those, who meet applicable authorship criteria. [Guidance on authorship criteria](#) has been created by the Committee on Publication Ethics (COPE).

Issues about joint ownership of work by students and supervisors should be discussed at an early point in the research cycle, and confirmed or renegotiated later, as work is written for publication. Authorship, order and contribution of authors on a paper or other publication should be agreed in writing as the research process moves towards publication (email is acceptable). A copy of written documents or emails should be kept by the authors so that in the event of disagreement on authorship then the original agreement can be reviewed. Verbal agreement on authorship and the ordering of authors should be avoided. Edinburgh Napier University's [Intellectual Property Policy](#) gives further information.

Researchers should acknowledge in publications those who have made significant contributions to the research but do not meet authorship criteria — including writers, funders, sponsors and others.

The University adheres to definitions of authorship provided by the UK Research Integrity Office's [Code of Practice for Research \(March 2017\)](#) which states that 'authorship should be restricted to those contributors and collaborators who have made a significant intellectual or practical contribution to the work. No person who fulfils the criteria for authorship should be excluded from the submitted work. Authorship should not be allocated to honorary or "guest" authors (i.e., those that do not fulfil criteria of authorship)'.¹

All staff and research degree students will have access to [Worktribe](#) to record their research profile and research activities. This will include publications, other research outputs, news, events, and measures of external recognition. This information is made publicly available on the University website. It is important that the Universities guidelines on authorship are maintained in this information to prevent misrepresentation.

¹ UK Research Integrity Office, *Code of Practice for Research* (2017), Section 3.15.5.

Section 12

Researchers should report any suspected misconduct to the appropriate authorities

Research misconduct can take many forms including fabrication, falsification or plagiarism, and other irresponsible research practices that undermine the trustworthiness of research such as carelessness, failing to report conflicting data, or the use of misleading methods.

The mechanism for reporting an allegation of misconduct is outlined in [Research Guidance Note 7](#).

Allegations of research misconduct by a member of staff will be initially investigated by the University Research Integrity Committee, and any cases of misconduct would then be dealt with under the Staff Disciplinary Policy.

Allegations of research misconduct by a research student will be considered a matter of Academic Misconduct and would therefore be subject to investigation under the Student Disciplinary and Fitness to Practise Regulations.

If you are unsure if a complaint is research misconduct, academic misconduct, student misconduct or a general whistleblowing complaint please contact any of the reporting mechanisms and this will be considered and transferred as confidentially as possible to the appropriate team for investigation.

The University [Research Safeguarding Framework](#) has been developed (2021) to address some of the safeguarding issues you may encounter

Research Guidance Note 1

Definitions of research, knowledge exchange and researchers

For the purpose of the Code of Practice on Research Integrity we consider all work of Research and Knowledge Exchange carried out under the name of Edinburgh Napier University to be governed by this Code.

Research

This Code uses the definition of research as described in the Assessment framework and [guidance on submissions](#) for the Research Excellence Framework. It is defined as ‘a process of investigation leading to new insights, effectively shared... It includes work of direct relevance to the needs of commerce, industry, and to the public and voluntary sector; scholarship; the invention and generation of ideas, images, performances, artefacts including design, where these lead to new or substantially improved insights; and the use of existing knowledge in experimental development to produce new or substantially improved materials, devices, products and processes, including design and construction’.

Knowledge Exchange

This Code uses a definition of Knowledge Exchange as the process by which universities, HEIs, and colleges’ knowledge, expertise and intellectually linked assets are constructively applied beyond further and higher education for the wider benefit of the economy and society, through two-way engagement with business, the public sector, cultural and community partners.

Researchers

Following the UK Research Integrity Office [Code of Practice for Research](#) (2009) researchers are defined ‘as any people who conduct research, including but not limited to: as an employee; as an independent contractor or consultant; as a research student; as a visiting or emeritus member of staff; or as a member of staff on a joint clinical or honorary contract’.

Research Guidance Note 2

Research Ethics & Governance Structures

Governance structures

Edinburgh Napier University is committed to promoting high standards of ethical awareness and behaviour by staff and students undertaking research, knowledge exchange and associated activities.

All staff and students involved in research at the University have a personal responsibility to behave in an ethical manner and in a way that does not bring the University's reputation into disrepute.

Each School has a Research and Innovation Committee with responsibility at School level for ethical approvals and procedures. This mechanism allows ethical approval processes to be adapted to local School needs. The University Research Integrity Committee reports to the University Research and Innovation Committee and helps develop university-wide practices and policies. Responsibility for compliance with the University Code of Practice on Research Integrity within each School lies with the Dean of School.

The ethics approval procedure has been devolved to School level to ensure that it is appropriate for the types of research commonly carried out in each School. These structures and policies have been endorsed by the University Research Integrity Committee and should be clearly published within each School with a web link to the University Code of Practice.

Cross-University Ethical Approval Procedure

The Cross-University ethical approval process is designed to consider applications with research located in more than one School, or an application from a researcher based out with the School structure (for example Professional services staff). The cross-university ethical approval process is a triage system based on risk assessment, ensuring special consideration is given to medical/invasive work, vulnerable groups, or research involving staff and students within Edinburgh Napier University.

A three-tier form has been established starting with a self-assessment to establish level of risk and guidance on to establish level of risk and guidance on level of scrutiny required for the research project. If the assessment establishes the research

to be low risk, it would be signed off at this stage. Medium risk research regarded to have a level of risk that requires consideration would be asked to complete standard ethical questions. Research deemed to be high risk would be directed to further questions for more rigorous scrutiny.

A panel of reviewers for cross-university applications draws from a pool of academics with expertise in ethics, subject areas and/or methodology, e.g., convenors of school research integrity committees, School Gatekeeper, members of staff with expertise/knowledge willing to contribute to our ethical approval procedures.

It is the responsibility of Research, Innovation and Enterprise (RIE) to receive the Cross-University ethical approval forms and the administrator will send the application to three identified reviewers who are given a two-week turnaround to approve/reject the application.

School Ethics, Structures and Policies

Within each School there should be clearly designated structures and policies which ensure that:

- a) There is a designated person or persons to oversee general operation of research ethics and governance activities within the School. This function could also be handled by a School Research Integrity Committee. Current information on individuals fulfilling relevant roles in relation to research ethics such as convenors of research integrity committees or 'gatekeepers' is available on School and University websites including Research, Innovation and Enterprise.
- b) Appropriate 'gatekeepers' are identified who are responsible for scrutinising any research proposals from staff or students within the School.
- c) The development needs of all staff involved in teaching, research and knowledge exchange are reviewed regularly, identified and met.
- d) The content of students' study programmes incorporates suitable training in the ethics and governance issues appropriate to their discipline and their level of study. This learning may fall largely, but not exclusively, within research methods modules. The University expects all academic staff to engage in developmental activities in order to ensure the currency and relevance of the knowledge they impart to students.
- e) Where a researcher is not fully competent or sufficiently informed to make a fair judgement about the conflicting needs and interests of direct and indirect participants (for example, in relation to an undergraduate project on a sensitive topic) it is essential that specialist advice is sought, normally

from the 'gatekeeper' in the first instance or from the Convenor of the School Research Integrity Committee.

Appropriate records are kept by researchers, 'gatekeepers' and committees to show for each project proposal, when ethical or governance issues have been identified, if they have been referred elsewhere (for example to an external committee) and what guidance or requirements have been given to the researcher or their 'gatekeeper'. There must be compliance checks to ensure that such advice or requirements are observed. This can be as simple as an email acknowledgement from the project's originator.

- f) Reporting relationships are established, including regular reports from School level to the University Research Integrity Committee.

The Role of 'Gatekeepers'

A gatekeeper is an experienced member of staff who is familiar with ethical good practice. For the purpose of this document, the gatekeeper will normally be a member of the School Research Integrity Committee who has been identified as having responsibility for an identified subject group, academic school or department, research cluster or other functional area within the School. This person will act as a point of contact and information for both academic staff and students undertaking research.

Specifically, the Gatekeeper will:

- Be an active member of the School Research Integrity Committee;
- Provide advice on ethical matters to: academic staff undertaking research; academic staff supervising students; and, students undertaking research as part of their undergraduate or postgraduate studies;
- Provide advice as to the process of obtaining formal ethical clearance for both staff and student research studies;
- Make initial assessments of individual applications for ethical approval on behalf of the School and University Research integrity committees using criteria detailed in the University Code of Practice on Research Integrity. As such, the Gatekeeper will act as an initial point of contact for supervisors, staff and students concerning ethical issues for specific research studies. The gatekeeper is required to be:
 - available to answer questions regarding research ethics;
 - provide timely feedback to staff and students regarding such issues;
 - make initial assessments of individual applications for ethical clearance; and,

- determine if further action (e.g., consideration by the School Research Integrity Committee) is required.
- Provide advice regarding the process involved in applying for ethical clearance via the School Research Integrity Committee;
- Act as a liaison between the School Research Integrity Committee and module and programme leaders;
- Act as a source of advice and support for academic staff supervising students undertaking research as part of their undergraduate or postgraduate studies;
- Promote research integrity to their representative group;
- Provide a summary of activities (e.g., number and type of enquiries, decisions made, etc.) and produce a report for the School Research Integrity Committee.

Ethical Approval Appeals Process

Exceptionally, if a matter raises ethical or governance issues on which the Convenor feels the School Research Integrity Committee cannot reach a decision, the Convenor may choose to refer the matter to the University Research Integrity Committee. The decision of the University Committee shall be final.

If a research proposal is rejected by the School Research Integrity Committee the researcher may appeal this decision.

Any appeals will be considered by the University Research Integrity Committee. The decision of the University Committee shall be final

Research Guidance Note 3

Informed consent

Gaining informed consent

When research involves human participants, it is necessary for the researcher to obtain consent from those individuals. Consent must be given freely and voluntarily and under no circumstances should coercion or indirect pressure be used to obtain a person's consent to participate in research.

Wherever possible and bearing in mind the nature of the research activity, an individual's consent should be obtained in writing. This is the 'gold standard' of informed consent. Where this is not possible, oral consent is an acceptable alternative. Ideally, oral consent should be tape-recorded or obtained in the presence of at least one witness.

Informed consent is not just simply asking if an individual wishes to be involved. They need to know what it is they are being involved in, and what will happen to the data collected. It therefore consists of two components (information and consent) which are of equal importance.

Information is key to 'informed' consent

Prior to participating, an individual should be fully informed about all aspects of the research project that might influence their decision to participate. This might include some or all of the following:

- The title of the study
- Purpose of the study
- A description of the procedures, purpose, length of time required and how participants will be involved
- Full explanation of any technical terms used
- Who is undertaking and sponsoring the project
- Any discomforts or inconveniences expected
- Any potential risks
- Any potential benefits that may result
- How confidentiality, anonymity and privacy will be maintained
- What will happen to the data, who will have access to it and how it will be stored
- Sources for information and assurances that researcher will provide further and ongoing information (for example the name and contact phone number of the researcher)

- how to raise concerns or to complain about the research, and to whom
- the consequences of non-participation (such as alternative treatments in the case of medical research, or alternative school activities in the case of some educational research).

This information should be written in simple language that is easily comprehensible by any potential research participants. Participants should be given sufficient time to study any information and to ask questions from relevant parties as needed. A copy of the information should be provided for the participant to retain.

Gaining consent is a process

Potential participants should be able, freely and voluntarily, to consent or refuse to participate in research.

Giving and obtaining consent is a process, not a one-off event that happens at the beginning of a person's involvement in research. During their active involvement, participants have the right to change their minds and withdraw consent. However, the right to withdraw cannot, practically, extend to the withdrawal of already published findings or be invoked in such a way as to compromise aggregate, anonymised data sets. This should be made clear to participants as part of the process of informed consent.

The researcher should be mindful that the individual also needs to be able to provide an informed response. An individual cannot give informed consent if:

- the intended research and their part in it is not clearly explained
- they are children or young people under the age of 18 years (for more details see [Research Guidance Note 5](#)).
- They do not have the capacity to make a judgement due to, for example, a disability or medical condition of some kind (for example, Alzheimer's disease, learning disabilities).

Advocates or the representatives may be able to give consent for vulnerable participants; guidance should be sought from the School 'gatekeeper' in this type of situation.

An example of a consent form can be found at the end of this research note. An example is also given for a consent form that could be used with children or young people. Further details on working with vulnerable groups and gaining consent can be found [in Research Guidance Note 5](#).

Research in public contexts

In certain types of research, obtaining consent from every individual present is neither practical nor feasible (for example, observing behaviour in public places, attending large meetings or observing discussions on the internet). When explicit consent cannot be obtained, implicit consent should not be assumed. For example, when observing a group of people in a public place implicit consent cannot be assumed. Instead, consideration of the risks and benefits must be conducted before proceeding.

In research of this kind the researcher should ensure that:

- The research is conducted in public contexts (for example, in areas that do not require negotiation or agreement in order to gain access to them)
- If relevant, approval is sought from relevant authorities
- If relevant, appropriate stakeholders are informed that the research is taking place
- specific individuals are not identified, explicitly or by implication, other than public figures acting in their public capacity (for example, reporting a speech by a public figure)
- attention is paid to local cultural values and to the possibility of being perceived as invading the privacy of people who, despite being in an open public space may feel they are unobserved.

Example of a consent form²

[TITLE OF STUDY]

Edinburgh Napier University requires that all persons who participate in research studies give their written consent to do so. Please read the following and sign it if you agree with what it says.

1. I freely and voluntarily consent to be a participant in the research project on the topic of [some words of explanation] to be conducted by [your name], who is an undergraduate/postgraduate student/staff member at Edinburgh Napier University.
2. The broad goal of this research study is to explore [broad description of study only — to avoid premature shaping of participant's responses]. Specifically, I have been asked to [brief overview of procedure], which should take no longer than [estimated length of study] to complete.
3. I have been told that my responses will be anonymised. My name will not be linked with the research materials, and I will not be identified or identifiable in any report subsequently produced by the researcher.
4. I understand that any of my personal data collected will be handled under the principles of Data Protection Legislation. This means by law that the researcher must process, use and destroy any of my personal data appropriately according to the legislation.
5. I also understand that if at any time during the [survey/interview/session/other] I feel unable or unwilling to continue, I am free to leave. That is, my participation in this study is completely voluntary, and I may withdraw from it without negative consequences. However, after data has been anonymised or after publication of results it will not be possible for my data to be removed as it would be untraceable at this point.
6. In addition, should I not wish to answer any particular question or questions, I am free to decline.
7. I have been given the opportunity to ask questions regarding the [interview/survey/procedure] and my questions have been answered to my satisfaction.
8. I have read and understand the above and consent to participate in this study. My signature is not a waiver of any legal rights. Furthermore, I understand that I will be able to keep a copy of the informed consent form for my records.

² An [editable form in Word format](#) is available to download from the intranet.

Participant's Signature

Date

I have explained and defined in detail the research procedure in which the respondent has consented to participate. Furthermore, I will retain one copy of the informed consent form for my records.

Researcher's Signature

Date

Example of a consent form for use with children and young people³

CONSENT FORM*

To be completed by the participant

	✓	✗
I have been given enough information about this project		
It has been explained to me how the information I give will be used		
I agree to take part in the research on [insert brief details]		
I understand that I can leave at any time and do not have to answer all of the questions if I don't want to		
I am happy for you to record what I say		
I give permission for my words to be used in a report, but I understand that my name will not be mentioned		

Participant's Signature

Date

I have explained and defined in detail the research procedure in which the respondent has consented to participate. Furthermore, I will retain one copy of the informed consent form for my records.

Researcher's Signature

Date

³ An [editable form in Word format](#) is available to download from the intranet. Adapted from Scottish Government Social Research, [Practical Guidance on Consulting, Conducting Research and Working in Participant Ways with Children and Young People Experiencing Domestic Abuse](#) (2009).

Research Guidance Note 4

Online survey tools

The following guidance is issued to help researchers to consider the ethical issues and to plan the use of online questionnaires as a research tool.

Anonymity for participants should be considered a priority and the confidentiality of the participant should be respected

Empirical research strongly supports the view that anonymity is important in survey research to obtain honest and accurate data, particularly in relation to sensitive or personal topics.

Informed consent must be demonstrated

As with all research, participant information explaining the purpose of the study and how the data collected together with the process of documenting informed consent must be demonstrated. To apply these fundamental elements to online research tools, the first question of any online questionnaire should establish that the participant has read the information and given their informed consent. If answered negatively, the online software will take the participant to a 'Thank you page' and give no opportunity to complete the survey.

The researcher has a responsibility to alert the participant to the point at which they may withdraw, after which all data will be fully anonymised and therefore untraceable

In any research study there comes a point where withdrawal is no longer feasible and it is misleading to suggest to participants that withdrawal at any time is in fact achievable. Whilst this is technically possible, the researcher may require additional expertise to identify data from individual participants and remove this.

- a. In the case of online questionnaires, there are two main options available to researchers and this information needs to be included in the participant information sheet:
 - i. The point of withdrawal is at the point of submission. The participant can no longer withdraw their data after this time.
 - ii. The point of withdrawal is at the point of submission in the first instance; however the participant has the option to withdraw their data at a later date specified by the researcher in the information sheet.

- iii. **At the end of the survey the researcher should highlight the point of withdrawal again.** Information should indicate that once 'data' has been submitted it will no longer be possible to withdraw from the study or the date for withdrawal and withdrawal procedure is clearly indicated. This information may be included on the 'Thank you for your participation page'.

After all questions have been answered a second opportunity for participants to confirm their consent should be given. Good practice would suggest that any semi-completed questionnaires without the confirmation of consent at the end of the questionnaire will not be included in the study. This would call into question the validity of the consent process.

University approved online survey software

The University offers staff and students the use of NOVI, a web-based survey application to facilitate the gathering and analysis of data from different audiences, for the purposes of both evaluation and research, either on or off campus. This application reduces the cost of gathering data, facilitates the tracking of respondents to send reminders and eliminates the task of entering data.

The University offers the use of Microsoft Forms as part of the Office365 suite. This can be used for simpler surveys. This has less functionality than NOVI but will be suitable for many surveys.

Roles and responsibilities for using NOVI and MS Forms

Information Services (IS) will maintain and enhance the survey application and be responsible for the creation of staff and student accounts.

- Edinburgh Napier University's Research Integrity Committee (URIC) will promote the governance of the ethical approval process and good practice and approve any School processes for implementation, as appropriate.
- Every researcher will be required to comply with the University's Code of Practice on Research Integrity, Data Protection Code of Practice and any other relevant policies and procedures.

Availability of NOVI

NOVI will be made available to all Edinburgh Napier University staff and students, whose use of the application for research or assessment activities has received the necessary ethical approval.

NOVI may be also be used by staff or students who are involved in purely evaluation activity.

Good practice in both evaluation and research activity will ensure that participants understand the purposes of the study, what will happen to their data, whom it may be shared with and whether any findings will be published.

Requesting access to NOVI

Staff: All staff will have automatic user rights to create a web-based survey using NOVI but will be required to obtain ethical approval where necessary.

Students: Students seeking use of the application should first contact their programme leader or research supervisor to discuss their research proposal. Where ethical approval is required, this must be obtained in accordance with the policy and processes of the respective School Research Integrity Committee.

All staff and students who are proposing to use NOVI should consult [this workflow chart](#). NOVI Survey support available from [ENU's Information Services Service Desk](#).

Availability of MS Forms

MS forms is available to all as part of Office365

Limitations on survey use

It is good practice to ensure that sample populations are not over-surveyed and therefore normally no individual should be surveyed more than once in any 15 working day period.

Assuring adherence to guidelines for research involving human subjects

If data from student records is to be used in assessment research, all requirements of the University's Code of Practice on Research Integrity, the Data Protection Act 1998 and the University's Data Protection Code of Practice must be met.

Non-public, student data may be used without the student's consent by University employees for approved educational purposes provided that the data has been fully anonymised in accordance with the UK Information Commissioner's Guidance to ensure that individual students cannot be identified.

All other proposed uses of personal data must comply with the Data Protection Act 1998 and the University's Data Protection Code of Practice.

Terms of use

The current version of NOVI is an authenticated system which links users to surveys.

In order to use the survey tools all users must comply with this Guidance and the following University policies, Codes and guidance:

- [Information Security Policies](#)
- Code of Practice on Research Integrity
- [Use of Personal Data in Research](#)
- [Social Media Usage Policy](#)

Misuse of the survey applications

Where staff or students are found to have breached this Guidance or any relevant University policies, Codes or guidance, this may result in their access to surveys being suspended, removed and/or disciplinary action being taken.

Research Guidance Note 5

Research involving vulnerable groups

The responsibility to conduct research rigorously, respectfully and ethically is magnified when undertaking research with people who are perceived as vulnerable. Certain people or groups of people may be considered potentially more vulnerable than others, but the term vulnerability is open to many interpretations.

Potentially vulnerable groups

Among the categories of people who are perceived to be vulnerable research participants are:

- a) People whose competence to exercise informed consent is in doubt, such as:
 - Children under 18 years of age
 - People who lack mental capacity (for example patients with Alzheimer's disease, adults with learning difficulties)
 - People who may have only a basic knowledge of the language in which the research is conducted
- b) People who may socially not be in a position to exercise unrestrained informed consent:
 - People who are in a dependent relationship with the research gatekeepers (for example university students, prisoners, asylum seekers)
 - Family members of the researcher
- c) People whose circumstances may unduly influence their decisions to consent, such as:
 - People who are in poor health
 - People who feel that participation will result in access to better treatment and support for them
 - People with disabilities
 - People who are in insecure employment (for example, agency workers or migrant workers)

Working with children and young people

If the involvement of children in a research study is justified, then parents or guardians should provide informed consent. However, in some cases obtaining the informed consent of a parent may be inappropriate (for example, research with children who have been abused by a parent) or infeasible (for example, research involving homeless children). In such cases an advocate for the child should be involved in the consent process, and advice sought from the researcher's 'gatekeeper'.

It is also best practice to obtain the consent of the child or young person as well. The researcher should consider that the ability of a child to give free and voluntary consent depends on that child's competence which varies with age, experience and confidence. An example of a consent form that could be used with children can be found in [Research Guidance Note 3](#).

If consent is obtained from the relevant adult but the child clearly withholds consent or shows distress, the wishes of the child should prevail.

In the case of research in educational settings, any special school policies or procedures should be followed

Protecting Vulnerable Groups (PVG) Scheme

All research staff working with young people in schools and other establishments are required to disclose any criminal convictions and must have been cleared through the [Disclosure Scotland System](#) as an executive agency of the Scottish Government.

The Protecting Vulnerable Groups (PVG) Act introduced the concept of 'regulated work' and will help to ensure that those who have regular contact with children and protected adults through paid and unpaid work do not have a known history of harmful behaviour.

Researchers wishing to regularly undertake research with children should consider joining the [Protecting Vulnerable Groups \(PVG\) Scheme](#) run by Disclosure Scotland. Edinburgh Napier University Human Resources maintains a [Protection of Vulnerable Groups Policy](#).

Research Guidance Note 6

Confidentiality, anonymity and data protection

Confidentiality and anonymity

While anonymity and data confidentiality are often used almost interchangeably, they are distinct:

- **Anonymity** means that the participant cannot be identified by anyone (including the researcher). Truly anonymous data is that which can never be reconstituted to identify an individual or combined with other data available to identify an individual. There is a distinction between holding data anonymously for the purposes of the project and publishing anonymous research data. Data will not be anonymous if group activities are taking place e.g., focus group meetings.
- **Confidentiality** means that the participant can be identified by the researcher but access to this information will not go beyond the researcher.

Maintaining the anonymity or confidentiality of research data offers advantages to both the researcher and participant. These include:

- To improve the quality and honesty of responses.
- To encourage participation in the study and improve representativeness of the sample.
- To protect the participants' privacy.
- To protect participants from discrimination or other adverse consequences of disclosure.

The principles of anonymity and data confidentiality should be made clear as part of gaining a participant's informed consent. The researcher must make it clear what is to be done with the data they collect and how the individual's identity will be protected.

The research should also explain if there are any plans for the anonymised data sets to be made available to other researchers, in line with the University's [Research Data Management policy](#) which encourages such use, sharing and publication as appropriate to ensure the maximum benefit is derived from any research undertaken under its auspices.

Data Protection Legislation

Currently data protection in the UK is governed by two pieces of legislation – the EU General Data Protection Regulation 2016 and the UK Data Protection Act 2018 (together referred to as the Data Protection Legislation). The Data Protection Legislation sets out six principles governing the use of personal information. The main purpose of these principles is to protect the interests of the individuals whose personal data is being processed by the University and they apply to everything the University does with personal data unless an exemption applies. The DP Legislation applies to personal data, that is, data from which a living individual can be identified. It does not apply to generic information about companies, aggregated statistical data or information about deceased individuals (although confidentiality should still be maintained and the personal data/confidentiality of the surviving family considered).

Respect for confidentiality is essential to maintain trust between the public and those engaged in research. All researchers intending to use personal data must comply with the requirements of the legislation, the University's [Data Protection Code of Practice](#) and in particular sections 5, 6, 7, 8, 11 and 20 and any associated guidance. In addition to computerised records these requirements apply to written records held in a structured filing system, digital and microfiche records, images and video recordings.

The principles are that personal data must be:

1. Fairly, lawfully and transparently processed
2. processed for limited purposes (purpose limitation)
3. adequate, relevant and not excessive (data minimisation)
4. accurate and up-to-date
5. not kept for longer than is necessary
6. kept secure, and pseudonymised wherever possible (integrity and confidentiality)

Individual's rights and international transfers are now two complete sections in the legislation, where they were previously principles. Individuals **MUST** be provided with a Privacy Notice before their data is collected. The University has a template which must be used.

What to consider when using personal data for research

Researchers should always consider when planning a project, giving data to and receiving it from others and before publishing information, whether their research data may lead to the identification of individuals or very small groups. There are two options:

- a) comply with the DP legislation; or

- b) anonymise the data to be used so that it no longer falls within the Act's definition of personal data.

Option a) means that all the requirements of the DP legislation must be met and option b) means that the personal data to be used must be completely anonymised. This will only be achieved if it is impossible to identify the subjects from that information together with any other information that the University holds or is likely to hold. Researchers are advised to use unlinked and truly anonymised data but if this is not possible, the amount of personal data they use and store should be kept to the minimum necessary to achieve the purpose of the study. Sharing of data should be limited to those who have a demonstrable need to know as part of their role in the research project.

Detailed guidance can be found in the University's [Data Protection Code of Practice](#) as well as in a [Researcher's checklist](#).

The UK ICO's [Code on Anonymisation](#) is available online. Appendix 2, Annexes 1 and 2 give some very useful, practical guidance for researchers on how to anonymise research data.

Research Guidance Note 7

Research misconduct

Edinburgh Napier University is committed to promoting high standards of ethical practice by all our staff and students undertaking research. Any allegations of research misconduct will be investigated thoroughly, fairly, and in a timely manner.

The UK Research Integrity Office defines misconduct in research as including, but not limited to:

1. fabrication
2. falsification
3. misrepresentation of data and/or interests and/or involvement
4. plagiarism
5. failure to follow accepted procedures or to exercise due care in carrying out responsibilities for:
 - a. avoiding unreasonable risk or harm to:
 - i) humans
 - ii) animals used in research
 - iii) the environment
 - b. the proper handling of privileged or private information on individuals collected during the research.⁴

Researchers should be aware that failure to gain institutional approval for their projects before beginning data collection, or failure to observe any conditions set by those bodies which have considered the proposal (either within the University or externally such as a NHS ethics committee) may constitute a disciplinary offence.

Allegations of research misconduct will be initially investigated by the University Research Integrity Committee following agreed [misconduct investigation procedures](#). Any cases of misconduct by a member of staff would then be dealt with under the [Staff Disciplinary Policy](#).

Allegations of research misconduct by a research student will be considered a matter of Academic Misconduct and would therefore be subject to investigation under the Student [Disciplinary and Fitness to Practise Regulations](#).

⁴ UK Research Integrity Office, [Procedure for the Investigation of Misconduct in Research](#) (2008), p. 29.

Research Guidance Note 8

Research conducted outside the UK

Different sets of legislation and social or cultural norms in different countries make this a complex issue, and detailed discussions with any potential partners about ethical standards should be conducted to ensure no reputational damage could occur to the University.

Processes for ethical approval of projects should be built into any collaborative programme approval process:

Taught overseas programmes containing research projects

Edinburgh Napier University has a number of taught overseas programmes that contain research projects conducted through our partner institutions. The University acknowledges that our partner institutions are highly regarded universities or institutes of education with their own processes to monitor research ethics. Ethical approval should therefore be conducted by the local partner institution where they have appropriate established infrastructure.

- a. It should be confirmed that the partner institution has a policy and process in relation to the ethical approval of research.
- b. The appropriate body for ethical approval within the partner institution should be identified.
- c. A process should be agreed for communicating to Edinburgh Napier staff that ethical approval has been given by the partner institution.
- d. The assumption would be that local decisions would hold, although the University would retain the right to veto a decision in exceptional cases.

The programme team should make explicit any limits to the nature of projects that can be undertaken.

Research conducted overseas by UK based staff and students

There may be situations where UK-based staff or students are conducting research overseas which is not being conducted through a partner institution (for example, field studies). If this is the case, they should gain approval by the normal Edinburgh Napier University research ethics approval process. In addition, researchers should demonstrate knowledge and understanding of the local legal and cultural context to ensure that research is carried out appropriately in the foreign setting.

For research where Napier is the lead partner on a collaborative project due diligence will need to be performed by RIE on all partners before the work starts. Where there is data being transferred between different countries a review of this is necessary to ensure there are no legal or security issues, this will happen as part of the data management review.

You should be mindful when conducting overseas research that you may be providing access to services as part of the research which are not usually available to participants, e.g. healthcare. There could be cultural sensitivities and perceived power to gain their participation even though this is not your intent.

Researchers should consider their safety when carrying out research overseas and should consult with the [University Health and Safety](#) team to minimise risks.

Research Guidance Note 9

Research versus evaluation activities

Introduction

The Code of Practice on Research Integrity applies to research activity carried out by staff and students at the university. However, there can be some debate about when an activity might be research and when it might be evaluation.

This guidance note is designed to illustrate some of the differences between research and evaluation, and to highlight the need for a consideration of the risks to participants arising from any activity before proceeding. There is a university expectation that both research and evaluation are carried out in an ethical manner by staff and students.

What is research?

The distinction between research and evaluation can be blurred. The recent REF2021 defines research as:

‘a process of investigation leading to new insights, effectively shared’.⁵

The Department of Health defines research as:

‘the attempt to derive generalizable or transferable ... new ... knowledge to answer or refine relevant questions with scientifically sound methods’.⁶

Research often aims for publication and wider dissemination of its findings. Some forms of research, such as initial pilot studies, may not be intended for publication but can form part of a research process.

⁵ Research Excellence Framework, [Guidance on submissions](#) (2019/01), p. 90.

⁶ NHS Health Research Authority, [UK Policy Framework for Health and Social Care Research](#) (2021), Section 3.1.

What is evaluation?

Evaluation 'provides practical information to help decide whether a development or service should be continued or not. Evaluation also involves making judgements about the value of what is being evaluated'.⁷

Unlike research, the purpose of evaluation is not to generate new generalizable knowledge, but to measure or judge standards of service. Evaluation may cover the process and outcome of education programmes, including the delivery and content of teaching.⁸

There are different forms of evaluation which depend on the primary purpose of the evaluation and what exactly is being evaluated, including both formative evaluation and summative evaluation. Formative evaluation can enhance the object of the evaluation. For example, formative evaluation of a new teaching module can help form the new module by examining the delivery and implementation of a practice, such as the teaching practices. Summative evaluation, in contrast, examines the effects or outcomes of an object. For example, by assessing whether the object (or practice) can be said to have caused a particular outcome.

Evaluation is generally carried out for local use, for example, collecting data about specific teaching programmes with no intent to generalise the result to other settings or situations. Evaluation data may however be reported at different levels (i.e., at module or programme boards, and academic committee discussions) within an organisation such as the university or may on occasion be used in external facing publications such as a prospectus or course webpage. The intention, purpose and communication plans of any evaluation activity should be carefully considered when designing an evaluation, as these may increase the perceived risk to participants.

Key differences between research and evaluation

Evaluation and research have different primary purposes. Evaluation generates improvements, judgments, and suitable follow-on actions. Evaluation seeks to judge an expected level of service (or practice, such as teaching) against defined criteria such as a quality framework. Research generates knowledge about how the world works and why it works that way, or gains insight into human experiences and perceptions.

Staff and students must therefore consider the purpose for which the data is collected, and the ways in which it will be used and disseminated to help distinguish between a research project and an evaluation activity.

⁷ Clinical Governance Support Team, *A Practical Handbook for Clinical Audit* (2005), Appendix 4.

⁸ Jill Morrison. '[ABC of learning and teaching in medicine: Evaluation.](#)' *BMJ (Clinical research ed.)* vol. 326, 7385 (2003): 385-7.

Research and evaluation activities can both employ quantitative and/or qualitative methods; we cannot therefore make assumptions about the research or evaluation status of an activity by considering the data collection method.

Table one, overleaf, describes several differences to help distinguish between research and evaluation activities.

Research	Evaluation
Purpose is testing a hypothesis and producing generalizable findings, or generating new knowledge or insights on a topic which may not be generalizable	Purpose is to determine the effectiveness, usability or appeal of a specific service or practice
Questions originate with scholars in a discipline	Questions originate with all key stakeholders and intended users of evaluation findings
Quality and importance judged by peer review in a discipline	Quality and importance judged by those who will use the findings to take action and make decisions
Ultimate test of value is contribution to knowledge	Ultimate test of value is usefulness to improve effectiveness, usability or appeal
Requires ethical approval	May not require ethical approval dependant on the approach to the evaluation and the intended type and use of the data

Table 1: Differences between research and evaluation activities⁹

For research involving the NHS, they have a [useful table](#) detailing the different types of research related activities – research, service evaluation, clinical audit and usual practice.

Academic publication

Increasingly, academic journals require proof that a project gained institutional ethical approval ahead of publication. This may apply to both peer reviewed research articles as well as other forms of publication such as conference proceedings.

⁹ Adapted from Michael Quinn Patton, [Evaluation Flash Cards](#) (2014, updated 2017).

Staff should therefore be aware that if they intend to publish their findings it would be prudent to apply for ethical approval at the start of any project, to ensure that they can subsequently share their findings with a wider audience.

Ethical conduct is required for both research and evaluation activities

Both research and evaluation must be carried out to the highest ethical standards. The guiding principles of our Code of Practice on Research Integrity are the ethical imperatives of **do no harm** (non-maleficence) and **do good** (beneficence). This applies equally to evaluation activities.

Our Code of Practice on Research Integrity defines and details the research practices to which all students and staff at the University are required to adhere when undertaking research. It contains guidance notes with examples of good practice for gaining informed consent; maintaining confidentiality, anonymity and data protection, as well as guidance on using online survey tools.

The UK Evaluation Society has created 'Guidelines for good practice in evaluation' to help commissioners and practitioners establish good practice in the conduct of evaluation. We would encourage anyone at the university involved in evaluation to consider these as a valuable source of good practice including the need for evaluation participants to:

- Be fully informed about the purpose of the evaluation and the procedures for collection and use of data
- receive an explanation of the possible outcomes from the evaluation (including use and publication of results) have assurance that the data collected is dealt with appropriately and in line with the Data Protection Act; and that any data made public is on the grounds of fairness, accuracy and relevance
- be assured that evaluators have taken all reasonable measures to check that the data are valid and any reporting that is a potential risk for participants has been negotiated
- have their privacy, confidentiality and cultural sensitivities respected.

Assessing the risks to participants, researchers and society

Staff undertaking either research **or** evaluation activities should always reflect on the balance of risks to benefits for participants taking into consideration:

- The individuals involved in the research

- Any potentially vulnerable groups (for example students may be considered a vulnerable group in certain circumstances)
- The sensitivity of any questions being asked
- Any potential risks to participants
- the storage and dissemination of any data collected

In an evaluation activity, because nothing new is being done to participants beyond what they might expect as routine to their programme, evaluations do not generally involve additional risk and therefore do not require the same level of ethical scrutiny as research projects.

Staff should nevertheless consider the vulnerability of the evaluation participants, especially if they are students taught by the staff members carrying out the evaluation, to ensure any risks are reduced. Staff should also carefully consider the sensitivity of the questions being asked during any evaluation activity.

Adopting a risk analysis approach to ethical approval for evaluation activity

All research projects require ethical approval and there are School Research Integrity Committees that consider such proposals. The membership of each committee is drawn from research active staff in the School. School processes are appropriate to the level of potential risk to participants from the proposal; therefore some research may be approved by 'gatekeepers' within School, while other proposals may be reviewed by the full Research Integrity committee of that School.

Evaluation does **not** require ethical review by a School Research Integrity Committee but should conform to good evaluation practices as described on page 46. In certain exceptional circumstances it may be best practice to have increased scrutiny of an evaluation activity by seeking ethical approval, helping to reduce potential risks. Figure 1 illustrates ways to ensure you have reduced potential risks from an evaluation activity.

Seek advice from experienced staff and professional bodies

This guidance note is intended to outline general differences between evaluation and research; however it will not address all situations. Staff can seek further advice from their local designated Research Integrity 'gatekeeper', or the School Research Integrity Committee.

This guidance note does not detract from the professionalism of staff who will be familiar with good practice in their disciplines, and they are encouraged to work within the context of research and evaluation practices appropriate to their fields.

Staff are encouraged to refer to codes of conduct or guidelines from appropriate professional bodies/societies to inform their decision making.

Evaluation activities are often carried out by a wide variety of departments within the university; from programme evaluation by academic staff, to service evaluations carried out by Professional Services or Student and Academic Services (SAS). Staff from these areas may be less familiar with the distinctions between research and evaluation and they are encouraged to discuss potential projects with members of School Research Integrity Committees for further guidance.

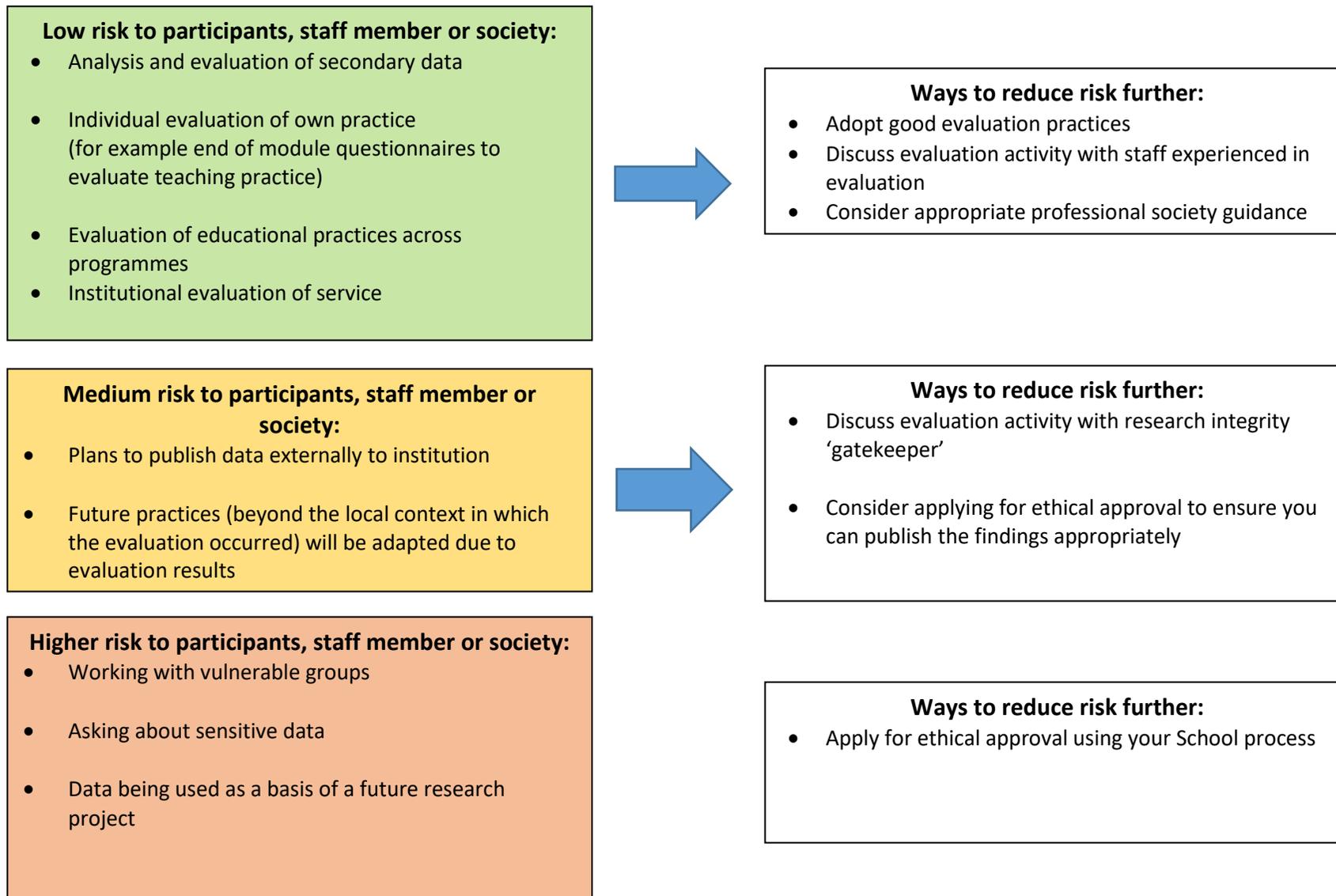


Figure 1: Adopting a risk analysis approach to ethical approval for evaluation activity

Research Guidance Note 10

Internet-mediated Research

The online world is a rapidly evolving one. 'Internet-mediated' or online research has increasingly moved from text-based analysis of newsgroups and chat rooms to the use of social media and virtual worlds for research purposes. Online survey tools such as survey monkey or NOVI have also led to an increase in the use of these tools to collect survey data over the internet.

The internet can be:

- used as a tool for research
- the means of conducting and disseminating research
- the locale for research
- the medium for research

What are the ethical issues in internet-mediated research?

There can be particular challenges and issues arising from internet-mediated research (IMR). It is also recognised that the rapidly evolving nature of the internet requires researchers to continually reflect on the ethical implications for their projects.

Some of the key issues to consider when undertaking internet-mediated research are briefly described below.

Informed Consent can be more challenging to obtain in online settings

Informed consent is one of the key concepts in traditional research ethics. In an online environment gaining informed consent can prove more challenging as many environments have a transient quality. Determining whether participants are able to give valid consent can be more difficult; for example, are the participants underage or do they have the mental capacity to give consent?

Where particularly sensitive or potentially harmful research is involved, offline consent procedures might be necessary for verification.

Participation in the research

As there is no direct contact between the researcher and participants this restricts the ability of researchers to intervene or debrief participants if they disclose an intention to cause harm to themselves or others.

Confidentiality

There is much debate about how individuals view the internet; as either a public or private space. What can be considered 'in the public domain' when considering collecting readily accessible online activities such as twitter streams, Facebook postings or other social media/networking sites is ambiguous. Researchers should therefore consider whether the individuals who created the original data/postings would consider them to be in the public domain.

Ethical approaches to publicly available information must include a consideration of the contextual nature of sharing and users' understandings of privacy. The AoIR ethics guidance applies this broad principle to public areas online

“the greater the acknowledged publicity of the venue, the less obligation there may be to protect individual privacy, confidentiality, right to informed consent, etc.”

Online information is very searchable, can persist, and can be transferred from one network or location to many others making it replicable as well. Published quotes for example can potentially be traced back to the participant via search engines. This can make it very difficult to promise anonymity for a research participant in these circumstances.

Extra care should be taken to consider and explain any additional data security and confidentiality risks due the nature of the online environment.

Where are the human subjects in the research data?

Understanding who, if anyone, is the human subject within a research project can be complicated within internet-mediated research. For example, is an online avatar a person? Is one's digital information an extension of the self? Is a Twitter stream a document, treatable as text, or is it a discussion between people? Collection of very large data sets (for example thousands of tweets) may appear far removed from the persons who engaged in these online activities; however, we must consider if they could be impacted by the research. As evidence suggests that even 'anonymised datasets' can result in individuals being identified, we must consider if that connection between one's online data and their 'real world' identity could result in harm. This consideration links to the fundamental ethical principle of minimizing harm from any research project.

Reliability of data

The collection of internet-mediated research data may be skewed (for example due to the demographics of a particular online group) and researchers may be misled due to misrepresentation of participants (for example a child adopting an adult persona, or a man representing themselves online as female).

Researchers should therefore consider if the level of validity available in an online setting would interfere with the scientific value of the data collected in such a way.

Secondary data and information online

When using online information as a data source you should consider whether it is appropriate to use the data in your research. Why is this information online and is your research compatible with this purpose and are permissions to use the content needed? This is important when data mining or scraping is used

When accessing secondary data online you should also consider the integrity of the methods used by the data owners. If this is not detailed in the dataset information you may be putting your research at risk. You should also consider any terms and conditions or licences dictating what is allowed in future use.

What guidance is there?

There is a substantial body of academic literature, guidance and guidelines that have been produced by a number of organisations. In developing this briefing, I have found the following to provide very relevant information:

- [Association of Internet Researchers](#)
 - Gives a detailed set of Internet Specific Ethical Questions to prompt reflection
- [British Psychology guidelines](#)
 - Provides a summary of the main ethical issues to consider for an IMR study
- [British Educational Research Association](#)
- [NatGen Social Research Using Social Media: Users Views](#)
 - Provides insight into how social media users feel about their posts being used in research, and provides some suggestions for improving research practices
- Social Media Research guidance from [St Andrews University](#) and [Aberdeen University](#)

We would encourage researchers at Edinburgh Napier to apply the ethical principles from our Code of Practice on Research Integrity, to consider internet-mediated research on a case-by-case basis, and to engage with these available resources to help develop their awareness of the ethical issues from internet-mediated research.

We would also encourage our ethics committees to share and discuss experiences, and to develop best practice in dealing with the evolving ethical issues of internet-mediated research.

Research Guidance Note 11

External Requests for Participation

From time to time the University receives requests from other institutions to involve students or staff in particular Schools as participants in their research or to access data held by Schools. These projects have normally been through ethical review at the institution submitting the request, and there is therefore no need to duplicate ethical review. However, the University needs to be satisfied that appropriate ethical review has been carried out.

Have the following been considered?

- Are there any potential risks to participants?
- Have measures been put in place to ensure that participants have been appropriately informed and have given consent, and that issues of anonymity/confidentiality have been addressed?
- If a group of students or staff is to be involved, what are the implications of some members of the group being unwilling to participate/
- If access to data is being sought, what type of data and will this have confidentiality issues?
- Are there likely to be any possible conflicts of interest (for example if a student at another institution is also a member of staff at Edinburgh Napier)?

Governance protocol

The University also needs to ensure that any relevant governance issues have been considered before agreeing to such a request. The following protocol should therefore be followed as a standard way of proceeding when such requests are received.

Institutions requesting to involve staff or students as research participants should be asked to provide a copy of the ethics submission and approval from their institution. No such request will be considered before confirmation of appropriate ethical review is provided.

Once a copy of ethical approval has been received, the institution should then be asked to provide answers to any other questions which might affect the decision whether or not to agree to the request, such as:

- How many students/staff would be involved?
- When and where would their participation take place?
- How long would this take?

- What would be resource implications in terms of staff time?
- Would the involvement of staff/students be likely to cause any disruption to the work of the School?
- How are participants to be recruited?

Subject to satisfactory answers to such questions having been obtained, the request should be passed to the Research Integrity Lead/Dean of School(s) from which the institution is asking to recruit participants, together with any further information or clarification provided, for them to take a decision as to whether they are happy for their staff or students to be approached as potential participants.

Recruiting participants

It should be noted that anyone intending to recruit staff and students at the University as research participants, is strongly advised to do so by using flyers, leaflets, or adverts placed on Moodle or Workplace by Facebook rather than by email, as targeting participants via email could contravene the University's privacy policy and the GDPR.

School conditions

In some cases, Schools may wish to attach conditions to any agreement to staff or students being involved. For example, in addition to having access to the outcomes of the research, the School may want to have sight of any material before this is placed in the public domain in order to minimise any risk of reputational damage arising from publication.

(adapted from University of Brighton)