Edinburgh Napier
UNIVERSITY

Code of Practice on Research Integrity

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This document supersedes any codes of practice on research integrity written before 2013.

Contents

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'[1] as well as the 'Singapore Statement on Research Integrity'[2].

1 The Concordat to Support Research Integrity (2012). Available at http://www.universitiesuk.ac.uk/highereducation/Documents/2012/TheConcordatToSupportResearchIntegrity.pdf [last accessed August 2013]

2 The Singapore Statement on Research Integrity (2010). Available at http://www.singaporestatement.org/downloads/singpore%20statement_A4size.pdf [last accessed August 2013]

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 Faculty 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.

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.

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.

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.

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.

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.

Research involving children under 16 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 Faculty 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
Participants' 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 Faculty or University Research Integrity Committee.

Section 9
The collection, storage, sharing, retention and disposal of research data by researchers must comply with the Data Protection Act 1998

Researchers should ensure they comply with Edinburgh Napier University's Data Protection Code of Practice[3] 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.

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[4].

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.

3 Edinburgh Napier University 'Data Protection Code of Practice' (2012). Available at http://staff.napier.ac.uk/services/secretary/governance/DataProtection/Documents/CoP/Code%20of%20Practice%20Revised%20April%202012.pdf [last accessed August 2013]

4 Edinburgh Napier University 'Guidance on the Safe Disposal of Confidential Waste' (2011). Available at http://staff.napier.ac.uk/services/secretary/governance/DataProtection/Documents/Safe Disposal of Confidential Waste revised August 2011.pdf [last accessed August 2013]

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.

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 respresentations 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)[5].

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. Edinburgh Napier University's Intellectual Property Policy[6] 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.

5 A position statement on 'Responsible research publication: international standards for authors' (2010) was created at the 2nd World Conference on Research Integrity, Singapore, 2010. Available at http://publicationethics.org/files/International%20standards_authors_for%20website_11_Nov_2011.pdf [last accessed August 2013]

6 Edinburgh Napier University 'Policy for the Ownership and Exploitation of Intellectual Property' (2006). Available at http://staff.napier.ac.uk/services/rkt/commercialisation/Documents/Intellectual%20Property%20Policy%20May%2006.doc [last accessed August 2013]

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.

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[7]. 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'.

7 The 'Assessment framework and guidance on submissions' for the Research Excellence Framework. Available at http://www.ref.ac.uk/media/ref/content/pub/assessmentframeworkandguidanceonsubmissions/GOS%20including%20addendum.pdf [last accessed August 2103]

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)[8] 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'.

8 The UK Research Integrity Office 'Code of Practice for Research' (2009). Available at http://www.ukrio.org/wp-content/uploads/UKRIO-Code-of-Practice-for-Research.pdf [last accessed August 2013]

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 Faculty has a Research Integrity Committee which reports to the University Research Integrity Committee which ultimately reports to Academic Board. Responsibility for compliance with the University Code of Practice on Research Integrity within each Faculty lies with the Dean, Director of Research or the Dean's nominee.

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

Cross-Faculty research proposals

Each Faculty Research Integrity Committee will also have at least two members who have been nominated to consider research proposals that are cross-disciplinary or research across more than one Faculty. These committee members would form a cross-disciplinary 'sub-committee' that would meet to deal with University-wide applications.

Cross-disciplinary or University-wide proposals should be submitted to the Convenor of each Faculty committee.

Proposals would then be distributed to the members nominated to consider this type of cross-Faculty research. Proposals would need to be sent with at least two weeks' notice before any 'sub-committee' meeting to allow members time to study the proposal. The members of this 'sub-committee' would meet to consider approvals and, if approved, this decision would be communicated back to each Faculty committee. This sub-committee would meet at least once per trimester and would feedback any decision to the applicant within two weeks.

In the event of a fundamental difference of opinion between ethics reviewers, then this type of proposal would be referred to the University Research Integrity Committee for review. The decision of the University Research Integrity Committee shall be final.

Research proposals from researchers not based in a Faculty

If a researcher is based within a University unit or department that is outside the Faculty structure then a number of routes for research ethical approval exist depending on the scope of the proposal:

a) If the research proposal is specific to one Faculty it should be sent to that Faculty Research Integrity Committee for approval.

b) If the research proposal is specific to a University unit or department outside the Faculty structure it should be sent to the Faculty committee most closely aligned with the research topic.

c) If the research proposal aims to research individuals across the whole University or outside the University, it should be considered by a member from each Faculty committee for approval.

Faculty Ethics, Structures and Policies

Within each Faculty 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 Faculty. This function could also be handled by a Faculty 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 Faculty and University websites including the Office of the Vice Principal (Academic).

b) Appropriate 'gatekeepers' are identified who are responsible for scrutinising any research proposals from staff or students within the Faculty.

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 Faculty Research Integrity Committee.

f) 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.

g) Reporting relationships are established, including regular reports from Faculty level to the University Research Integrity Committee.

The role of 'gatekeepers'

Each Faculty operates a system of 'gatekeepers' who are responsible for scrutinising any research proposals from staff or students within the Faculty. This may include scrutinising projects undertaken by students on taught or research degree programmes; staff projects including those in collaboration with external partners; prior scrutiny of proposals being submitted to external ethics committees for approval; and scrutiny of projects proposing to use students or staff as the subject of the study.

'Gatekeepers' need to be able to understand ethics and governance issues as applicable within their field. If necessary, these gatekeepers should receive suitable staff development to enable them to carry out this role effectively.

Information on current 'gatekeepers' in each Faculty can be obtained from the relevant Faculty Research Integrity Committee.

In practice, academic staff also act as 'gatekeepers' when considering student research projects and assessment:

What	Responsibility
Honours projects	supervisor and student
Masters projects	supervisor and student
PhD	supervisory team and student
Funded research	relevant faculty gatekeeper and principle investigator
Consultancy	relevant faculty gatekeeper and principle investigator
KTP	relevant faculty gatekeeper and principle investigator

Each Faculty has created guidance for researchers to help identify ethical issues, for example through self-assessment checklists. If a researcher has identified a problem, this should be referred to the appropriate 'gatekeeper' within the Faculty. If, after discussion, they are unable or unwilling to resolve the matter, the gatekeeper would refer the matter to the Faculty Research Integrity committee.

Ethical Approval Appeals Process

Exceptionally, if a matter raises ethical or governance issues on which the Convenor feels the Faculty 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 Faculty 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 16 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 Faculty '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 form[9]

[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 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.
5. In addition, should I not wish to answer any particular question or questions, I am free to decline.
6. I have been given the opportunity to ask questions regarding the [interview/survey/procedure] and my questions have been answered to my satisfaction.
7. 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.

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 _____

9 An editable form in Word format is available to download at http://staff.napier.ac.uk/services/vice-principal-academic/research/researchpractice/Pages/CodeofConduct.aspx

Example of a consent form for use with children and young people[10, 11]

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 _____

10 An editable form in Word format is available to download at http://staff.napier.ac.uk/services/vice-principal-academic/research/researchpractice/Pages/CodeofConduct.aspx

11 Adapted from 'Practical Guidance on Consulting, Conducting Research and Working in Participant Ways with Children and Young People Experiencing Domestic Abuse' (September 2009). Available at http://www.scotland.gov.uk/Resource/Doc/284756/0086482.pdf [last accessed August 2013]

Research Guidance Note 4
Online survey tools

The following guidance is issued to help researchers to consider the ethical issues and to plan their 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.

b. **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'.

Re-establishing consent at the end of the questionnaire

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.

Online survey tools and software

When considering which online survey tools to use, researchers should make sure that the survey has the capability to deal with the type of data required, as well as issues including the country the data will be stored in. Researchers should ensure that the sample size has sufficient statistical power and that the researcher(s) have the skills to conduct the analysis. Researchers should be aware of the implications of using an externally hosted service to host survey data, as the data held must still comply with the Data Protection Act 1998.

Below is a list of some online survey tools that may be suitable. There are many more – a list of online survey providers can be found at http://www.cbsolution.net/applications/surveycruncher/hacks/online-survey-service-providers.html

Survey Monkey
This is a very popular survey tool and is available to both staff and students. (As of May 2013 there are plans for this software to be provided through C&IT Services and would therefore become the recommended software for use by Edinburgh Napier Researchers.)
http://www.surveymonkey.com [last accessed August 2013]

Survey Methods
This is a comprehensive and reliable survey tool, however, there is a cost to use it.
https://www.surveymethods.com [last accessed August 2013]

Survey Gizmo
This survey tool is mainly orientated for market research.
http://www.surveygizmo.com [last accessed August 2013]

QuestionnairePro
This is one of the top survey tools, however, it may require more skill on the part of a researcher to get the most out of it.
http://www.questionpro.com [last accessed August 2013]

Smart-Survey
This is a UK-based survey tool and is reasonably priced.
http://www.smart-survey.co.uk [last accessed August 2013]

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 researchers '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. Information is available at http://www.disclosurescotland.co.uk [last accessed August 2013]

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. More information can be found at http://www.disclosurescotland.co.uk/pvg [last accessed August 2013]

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).
- **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 Data Protection Act 1998

The Data Protection Act sets out eight 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 DPA 1998 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.

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 eight principles, 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 eight principles are that personal data must be:

1. fairly and lawfully processed
2. processed for limited purposes
3. adequate, relevant and not excessive
4. accurate and up-to-date
5. not kept for longer than is necessary
6. processed in line with individuals' rights
7. kept secure
8. not transferred to other countries without adequate protection.

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 DPA 1998; 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 DPA 1998 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[12] as well as in a Researcher's checklist[13].

The UK ICO's Code on Anonymisation[14] has recently been published. Appendix 2, Annexes 1 and 2 give some very useful, practical guidance for researchers on how to anonymise research data.

12 Edinburgh Napier University 'Data Protection Code of Practice' (2012). Available at http://staff.napier.ac.uk/services/secretary/governance/DataProtection/Documents/CoP/Code%20of%20Practice%20Revised%20April%202012.pdf [last accessed August 2013]

13 Edinburgh Napier University 'Researcher's Checklist for compliance with the Data Protection Act 1998'. Available at http://staff.napier.ac.uk/services/secretary/governance/DataProtection/Documents/Researcher%27s%20checklist%20revised%20March%202012.pdf [last accessed August 2013]

14 The UK Information Commissioner's Office 'Anonymisation: managing data protection risk Code of Practice' (2012). Available at http://www.ico.gov.uk/for_organisations/data_protection/topic_guides/~/media/documents/library/Data_Protection/Practical_application/anonymisation_code.ashx [last accessed August 2013]

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[15] as including, but not limited to:

a) fabrication

b) falsification

c) misrepresentation of data and/or interests and/or involvement

d) plagiarism

e) failure to follow accepted procedures or to exercise due care in carrying out responsibilities for:

   i. avoiding unreasonable risk or harm to:

      - humans
      - animals used in research
      - the environment

   ii. the proper handling of privileged or private information on individuals collected during the research.

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.

15 The UK Research Integrity Office 'Procedure for the Investigation of Misconduct in Research' (2008). Available at http://www.ukrio.org/wp-content/uploads/UKRIO-Procedure-for-the-Investigation-of-Misconduct-in-Research.pdf [last accessed August 2013]

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.

Research Guidance Note 8
Research conducted outside the UK

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.

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:

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.

Researchers should consider their safety when carrying out research overseas, and should consult with the University Health and Safety team to minimise risks[16].

16 Edinburgh Napier University Health and Safety 'Guidance on health and safety in fieldwork' and other advice on other research matters. Available at http://staff.napier.ac.uk/services/hr/healthandsafety/guidance/Pages/Research.aspx [last accessed August 2013]