Research Ethics Policy

1. Scope and context

1.1 Walbrook's approach to research and scholarship is set out in the Research and Scholarship Strategy. We are committed to ensuring that any research undertaken under the name of Walbrook is of the highest ethical standards, and this policy sets out the principles and procedures that we use.

1.2 The policy applies to academic research undertaken by all members of Walbrook's academic community, including staff (on any form of contract) and students. Research undertaken for non-academic purposes (for example, marketing research) is not bound by this policy, but colleagues should always ensure that they abide by legal requirements and any relevant professional frameworks.

1.3 Responsibility for creating an ethically-sound research culture and enabling staff to develop the relevant skills rests with the Provost on behalf of the Academic Board. The Academic Board has responsibility for the contents of this policy.

i Walbrook will ensure that staff and students have the relevant training and guidance to comply with this Policy. The nature of the training and guidance will be relevant to the level and nature of research they are undertaking, or to their responsibilities for overseeing specific processes.

2. Principles

2.1 The Policy is based on the following principles which are informed by the UK Concordat to Support Research Integrity (2025) and adopted from the UKRI -Framework for Research Ethics (2025):

i research should aim to maximise benefit for individuals and society and minimise risk and harm

ii the rights and dignity of individuals and groups should be respected

iii wherever possible, participation in research should be voluntary and appropriately informed

iv research should be conducted with integrity and transparency

ii lines of responsibility and accountability should be clearly defined

iii independence of research should be maintained and where conflicts of interest cannot be avoided, they should be made explicit.

2.2 Further detailed information about these principles is published in relevant discipline specific ethical frameworks, such as those published by the British Psychological Society and the British Computing Society.

3. Ethical Risks and Considerations

3.1 The ethical implications of any academic research proposal undertaken by a member of staff or student must be considered. Walbrook provides a self-assessment checklist as

part of its ethics application form to help researchers recognise and reflect on potential ethical issues in their proposals before formal ethics review.

iv Most research conducted as part of taught programmes does not require formal ethics approval, provided it does not involve human participants, identifiable personal data, or sensitive topics. Projects using publicly available, anonymised data, or those undertaken purely for educational purposes without intent to publish, typically fall outside the scope of formal ethical review. However, students must still consider ethical implications and consult their supervisor or School ethics representative to confirm whether approval is necessary.

3.2 Research conducted as part of a capstone project or research dissertation will normally require formal ethical review, particularly where primary data are collected from human participants. Module leaders are responsible for indicating where an assessment is likely to require students to consider and apply for ethical approval.

3.3 Any research proposal involving human participants and personal data will require ethical approval and this process will be proportionate to the level of potential risk. Research misconduct will be deemed to have taken place if the research, including any data collection, starts without the relevant approval.

3.4 The risk categories that we use are as follows:

i Low risk: Research is normally deemed lower risk when the potential for harm, discomfort, or intrusion is minimal and no greater than everyday experiences, with any participants fully informed, data anonymised, and no vulnerable populations or sensitive issues involved. Research that draws upon publicly available data is usually lower risk.

Examples may include, but are not limited to:

- Online questionnaire on study habits and motivation among university students
- Reaction-time experiment using visual stimuli on a computer
- Secondary analysis of anonymised wellbeing data from a national survey (e.g., ONS)
- Observation of seating choices in a campus cafeteria
- Short semi-structured interviews about how people organise their workspace at home
- Anonymous employee survey on preferred communication tools at work
- Analysis of anonymised company sales or customer-service data
- Observation of consumer browsing behaviour in a retail space (no interaction or identification)
- Interviewing small-business owners about their marketing strategies
- Student research analysing public financial statements or CSR reports

ii High risk: Typically, where research involves actions that could expose, intrude or harm the researcher, the participants or Walbrook, it is deemed higher risk.

Examples include, but are not limited to:

- Research involving children or vulnerable adults (see Safeguarding Policy)
- Research into sensitive subjects (such as gender, sexuality, abuse, criminality)
- Research activity where there is a personal or professional power dynamic between the researcher and the participants (e.g. their children, members of staff)
- Research that involves intrusive or covert methods
- Research that might expose the researcher to higher than usual risks

3.5 There is potential for all research to become higher risk, even where it has initially been evaluated as lower risk. For example, were a participant to make a highly sensitive disclosure as part of a routine interview, or where unforeseen events increase the risk to the welfare of the researcher. Therefore, each project should be assessed individually, with researchers exercising their judgement to identify and mitigate any potential ethical risks specific to their study.

4. Ethics application process

4.1 The ethics application process is broadly the same for students and for members of staff. The key distinction is that student researchers must have their proposals reviewed and signed off by their supervisor prior to submission.

4.2 The researcher must first complete their ethics application form. This includes a self-assessment checklist which will indicate whether the research proposal is likely to be lower or higher risk. This completed application form, and all relevant supporting documentation as appropriate to the project must be submitted to researchethics@walbrook.ac.uk.

v All research ethics applications will first be passed to an appropriately qualified lead reviewer. The lead reviewer is responsible for evaluating the proposal in its entirety and making a recommendation to the Chair of the Research Ethics Committee (REC) on whether it can be approved with or without additional discussion.

4.3 The lead reviewer will make a recommendation to the Chair based on their review which will include their assessment of the risk, and their recommendation for next steps. Where the lead reviewer evaluates the application as a lower risk application and the Chair is in agreement with the lead reviewer, the Chair will:

i Grant ethical approval, including approval of the measures proposed for mitigating the risks identified, with no conditions

ii Grant ethical approval subject to conditions, which may relate to the project design, the measures proposed for mitigating the risks identified, or other related aspects

iii Request that the ethical approval application form is referred back to the REC at a later date following specified modifications

iv Refuse ethical approval for reasons that will be shared with the student or member of staff.

4.4 Where the lead reviewer evaluates the application as a higher risk application, and the Chair is in agreement with the lead reviewer, the Chair will ask for the proposal to be

shared with REC members for discussion and review. The outcome of REC consideration will be to either:

i Grant ethical approval, including approval of the measures proposed for mitigating the risks identified, with no conditions

ii Grant ethical approval subject to conditions, which may relate to the project design, the measures proposed for mitigating the risks identified, or other related aspects

iii Request that the ethical approval application form is referred back to the REC at a later date following specified modifications

iv Refuse ethical approval for reasons that will be shared with the student or member of staff.

4.5 The Chair of REC can disagree with the assessment of a lead reviewer and decide to upgrade or downgrade a research proposal where they deem it appropriate, and can evidence their reasons for doing so, based on precedent or a re-evaluation of risk.

4.6 Research can only start where approval is given and where any conditions have been met. This principle applies to all proposals irrespective of risk level. Each approved research proposal will be given an Ethical Approval Reference Number which must be quoted by the researcher (whether staff or student) on any information sheets or consent forms used in the research

4.7 The Academic Services team will have responsibility for coordinating the consideration of research proposals and informing applicants of the outcome.

vi All researchers should keep copies of their approved ethical applications, information sheets, and consent forms, together with a log of any issues that arise during the course of their research, the date of notification of the issue to the designated person in the relevant qualification programme team responsible for co-ordinating the authorisation of the ethical approval application forms (e.g., programme manager) or the REC as appropriate, and any response received.

4.8 If a researcher is dissatisfied with the outcome of the ethics approval process, they may appeal, clearly stating their grounds. All appeals should be sent to the REC, using the researchethics@walbrook.ac.uk email address. Where the REC confirms its original decision about high-risk proposals, the researcher may appeal in writing to the Academic Board which will convene a special panel. The decision of the Academic Board will be final.

5. Research Misconduct

5.1 Research misconduct is the failure to conduct research in accordance with the principles set out in this Policy and with the research protocols approved in the research proposal. It includes, but is not limited to:

i Not exercising appropriate care in respect of responsibilities relating to avoidance of harm to human participants or the environment

ii Not gaining informed consent

iii Undertaking research prior to or without gaining ethical approval

iv Not exercising due care in the handling of privileged or personal data.

v Not conducting research ethically or with integrity including fabrication, falsification, misrepresentation of data and / or interests, withholding of data that affects the findings, or plagiarism in proposing, performing, or reviewing research or in reporting research results.

5.2 Walbrook's definition of research misconduct is informed by the UKRIO Procedure for the Investigation of Misconduct in Research (2023) and the UKRI Policy and Guidelines on Governance of Good Research Conduct (2025).

5.3 Any alleged student research misconduct will be considered through the process set out in the Academic Misconduct Policy. This includes any situation where a participant alleges to have been harmed in any way within the research process, or any other situation in which the conduct of the research has not aligned with the principles set out in this Policy and/or the approved research proposal.

5.4 Any alleged staff academic misconduct will be considered through the staff disciplinary process.

6. Supervisors

6.1 Staff responsible for supervising students' dissertations and projects, whether at undergraduate or postgraduate level, must receive appropriate training for the role.

6.2 This training should include understanding their responsibilities regarding the ethical issues relating to the research undertaken by the students under their supervision as set out in this Policy.

6.3 Training should also cover their responsibilities for ensuring that students under their supervision are observing proper and legal practice in relation to the handling of data, observing the requirements set out in Walbrook's policies on data protection and use.

6.4 No member of staff should supervise a postgraduate taught Master's dissertation if they have not, as a minimum, undertaken a Master's qualification involving a dissertation.

6.5 Normally, staff supervising a Master's dissertation will have completed a substantive research project as part of completing a research doctorate programme.

6.6 New supervisors will be mentored by staff more experienced in facilitating student research.

7. Research Ethics Committee

7.1 The Academic Board will constitute a Research Ethics Committee which is charged to:

i Review and approve applications for ethical clearance prior to research commencing.

ii Ensure that informed consent is appropriately designed and documented.

iii Appoint appropriately qualified individuals to act as lead reviewers.

iv Evaluate the balance of potential risks and benefits to participants.

v Oversee adherence in research practice to institutional and legal standards for data protection, confidentiality, and research integrity.

vi Advise on complex or borderline ethical issues referred by staff or students.

vii Report annually to the Academic Board on its activity.

7.2 In appointing lead reviewers, the Research Ethics Committee must satisfy itself that any applicant has:

i A least a Master's degree, and ideally a research doctorate (or equivalent experience) in a relevant field.

ii At least two years' experience in research, supervision, or project evaluation.

iii Completed research ethics training (internal or external) within the past three years.

iv A commitment to ongoing professional development in ethics and research governance.

7.3 In executing their duties, lead reviewers must commit to:

i Act with impartiality and integrity.

ii Declare any conflict of interest and recuse themselves where appropriate.

iii Maintain confidentiality of applications, deliberations, and outcomes.

iv Uphold Walbrook's values of respect, fairness, and transparency.

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