



Minutes Meeting of the University Research Ethics Committee

- Date:** 14th November 2018
- Present:** Professor Peter Bath in the Chair
- Secretary:** Mrs Lindsay Unwin
- Minute Secretary:** Miss Anita Kenny
- In attendance:** Dr Jo Bates; Ms Maria Clark; Dr Richard Cooper; Ms Anne Cutler; Ms Margaret Ellis; Dr Ana Vivas; Dr Thomas Webb; Louise Weatherley.
- Apologies:** Professor Stephen Beck, Dr Jennifer Burr; Ms Lauriane Suyin Chalmin-Pui; the Venerable Robert Fitzharris; Dr Carmen Levick; Dr Karen Ford; Professor David Petley; Dr Yog Upadhyay; Zeerak Waseem.

Action by

1. MINUTES OF THE MEETING HELD ON 12TH SEPTEMBER 2018

A concern was raised regarding item 5, in relation to the composition of Professional Services and the need to be clear about to whom the Policy Note on Administrative Research applies. The Committee **recommended** that this concern be investigated further.

Research Services

The Committee **recommended** that the minutes are approved upon clarification of the point raised.

Research Services

2. MATTERS ARISING ON THE MINUTES

The Committee were informed that all matters arising were either complete or in progress.

Under item 1 from the meeting on 12 September, there was an action for the minutes of the meeting held on 16th May to be circulated to members by email following the meeting. This was completed and no comments were received so the Committee **recommended** that these minutes be signed.

Chair

Under item 4 from the meeting on 12 September, there was an action to put forward updates to Committee's Terms of Reference – in preparing these it came to light that some other recent changes to the ToR had not been formally approved by Senate. The version sent to Senate therefore contained the earlier changes in addition to those put to UREC in September, in order to bring the Senate-approved version up to date.

Under item 17 the Secretary confirmed that a response had been received from the British Academy in relation to how its terms and conditions can be met for a research project taking place in a country where there are no formal ethics approval arrangements. The BA confirmed that the University should provide a

justification of how the research would be ethically approved, including details of the procedures that will be undertaken to ensure that all research conducted would be ethically sound.

3. CHAIR'S REPORT

The Chair welcomed the following new members of the Committee:

- New student representative Zeerak Waseem, a PhD student in the Department of Computer Science;
- New student representative Louise Weatherley, an Undergraduate student in the Department of Psychology who has a background in nursing with involvement in a range of clinical research projects.

The Chair advised the Committee that there is an internal audit of research ethics arrangements taking place which is being administered by Price Waterhouse Coopers (PWC). PWC provide the University's internal audit function and audit a programme of areas each year as defined by University Audit Committee.

An initial meeting with the auditors involving the Chair and Secretary took place on 12 November, where an overview of the policies, procedures and monitoring arrangements was provided. The auditors have selected two departments to visit as part of the audit – the School of East Asian Studies, and the Department of Psychology. Dr Webb reported that he had been involved in discussions with the auditors with respect to the ethics arrangements in Psychology. Clarification was sought with respect to whether there would be an opportunity to fact-check the resulting report; it was confirmed that there would be.

The Chair advised the Committee of recent cases of breach of the Ethics Policy:

New cases (not yet reported to UREC):

- A PGT student posted a survey on an online community website without providing any information about ethical approval for the project, the purpose of the survey, or who was carrying it out. The survey contained some sensitive questions and had received some comments on the website from people who were concerned about its appropriateness. The website was contacted and asked to remove the post, which was done promptly. The survey was traced by CiCS and the department asked to investigate. The student had posted the survey by mistake; they intended to post an 'expression of interest' form while they awaited ethics approval. The supervisor has made it clear to the student that no contact should be made with potential participants until ethics approval is in place. Discussions about this case are still underway.
- A former member of staff obtained ethics approval for a large international collaborative project, but the data collectors (employed by a collaborative partner) audio recorded some interviews without informing the participants, and without ethics approval for doing this. Data collection was stopped whilst the situation was investigated; the audio recordings were destroyed, and plans put in place to re-contact the affected participants to explain and provide an opportunity to withdraw, and also to amend the data collection processes and re-train the data collectors to ensure this did not happen again. It was agreed that data collection would re-commence; the research team will provide a report on a detailed analysis of the incident in due course.

- A PGT student submitted an ethics application and this went through the 'supervisor check' stage of review, but the supervisor did not complete the risk assessment or ethical review stages, despite multiple email prompts (the department reported that the supervisor was experiencing email issues at this time). The student was told that ethics approval had been granted and proceeded in good faith, believing everything was in place. It was therefore agreed that she should be allowed to keep to the data and should not be penalised; however, the department was asked to ensure that the supervisor attends ethics reviewer training.
- Two cases involving PGT students– the department has now reported on their investigations and the reports are being considered by the Deputy Chair and Secretary.
- A PGT student– the department is investigating and is due to report very soon.
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Updates on existing cases (reported previously):

- An issue was reported at the last meeting relating to a former member of staff, in which interviews had been published as part of a government inquiry. This highlighted some concerns about the ethical review arrangements in the department concerned – a meeting with the department is due to place later this week to talk through the issues and agree actions needed to address them.
- A case involving two staff members has now been closed; it was established that it was an oversight that ethics approval was not obtained, and there were no mitigating circumstances – the staff members were asked to destroy the data and related draft publications.
- A case involving a PGR student has been closed; the student had overlooked the requirement for ethics approval, with no mitigating circumstances, so the student was asked to destroy the data, along with relevant parts of the thesis.
- A case involving a PGR student has been closed. The student started their PhD in 2009, using Twitter data; the issue of ethics approval came up when they were looking to deposit the dataset in the ORDA open access repository. The vast majority of the research was complete by the time the UREC policy on social media data was approved by Senate, with the student just writing up the thesis by this time. It was therefore agreed that the student was not at fault and should be allowed to continue to graduate. It was noted that cases similar to this are likely to come up in future, and that if data collection continued after the introduction of the policy note, a different stance may need to be taken.

The Committee were advised that a full report on ethics breaches during the past year will be discussed under item 5.

The Chair updated the Committee regarding the funding opportunity for ethics and integrity projects. This has now been advertised across departments via Principal Ethics Contacts, and has already generated some interest. The deadline for applications is 18th January.

Finally, the Chair updated the Committee regarding the development of online ethics training. The Secretary had discussed the proposed short introductory online training course with Dr Graham McElearney (Senior Learning Technologist). It was noted that the project may be more likely to be successful if it is tailored to the audience – since most breach cases involve UG/PGT students it is proposed that the training is focussed on their needs (with a view to developing a PGR/staff version later). The Chair asked the Committee for their views on this. There was a view that the greatest need for training is amongst new staff because staff train and supervise students; however, the value of training for UG/PGT students was also recognised, and it was agreed that training needs to be tailored to the level and complexity of project being completed by the researcher.

The Committee **recommended** that the development of a course for UG/PGT students be taken forward in the first instance, and that supervisors should be encouraged to undertake the training as well to ensure that their understanding matches that of their students, as a minimum. It was also noted that it would be helpful if there could be a mechanism for recording and monitoring completion of the training (e.g. by linking to existing processes for monitoring student attendance).

4. **ANNUAL REPORT OF ETHICS DECISIONS AND SUMMARY OF ANNUAL RETURN FORMS SUBMITTED BY DEPARTMENTS FOR THE PERIOD 01.09.17 – 31.08.18**

The Secretary introduced the paper to the Committee and highlighted a number of points within the paper. It was noted that data is extracted from the online Ethics Application System in relation to completed applications.

It was noted that generally there has been an increase in numbers of applications, as in previous years. The potential reasons for this were discussed; it was noted the significant increases in PGT student numbers in several departments was likely to be a key reason.

The following discussion took place regarding the sections of the report relating to the Annual Update form, which departmental ethics contacts were asked to complete:

Section 4

The Committee noted that no Annual Update was received from AMRC, the Department of Chemical and Biological Engineering, the Department of History, or the Department of Philosophy, and **recommended** that these departments be contacted to discuss this.

Section 4.1: Actions taken by departments in response to changes in data protection legislation

As part of the Annual Update form, departments were asked to report on the actions they had taken in response to the introduction of GDPR and the new UK Data Protection Act 2018. Whilst some Departments were very pro-active and expressed concerns regarding raising awareness and ensuring compliance, some departments had either not responded to the question or had indicated that there were no ongoing plans to ensure awareness of and compliance with the new legislation. This raised concerns within the Committee as GDPR compliance is a legal, regulatory requirement.

The Committee **recommended** that all ethics contacts should be emailed to Research Services to remind them of the need to ensure researchers are aware of GDPR compliance requirements and that Heads of Departments should be copied into this communication. This email should include key UREC guidance on data protection, and information about the training that the Data Protection Officer and her team can provide.

Section 4.2: Areas of concern within departments

Departments were given an opportunity to highlight any challenges or concerns they have in relation to their ethics arrangements. Details of the responses were provided in two categories – general departmental challenges, and issues relating to the online Ethics Application System.

The issues raised were considered by the Committee; in terms of the general departmental challenges, it was noted that these were generally issues to be managed internally by the departments concerned. It was noted that the online training to be developed for UG/PGT students would help in raising awareness, a concern raised by 5 departments.

In terms of the issues raised relating to the online Ethics Application System, it was noted that these should be considered further by Research Services and discussed with Epigenesys as appropriate. In response to a question raised about the lead reviewer having to review an application first, and then review it again as lead reviewer to make a final decision, the Committee's view was that it is important for the lead reviewer to consider the application independently first so they are able to form their own opinion, before considering the other reviewers' opinions.

The Committee also noted that the Department of Sociological Studies had recorded that undergraduate ethics applications had been approved using paper based applications and that it was intended for this process to continue. The Committee **recommended** that Research Services should contact the department to establish why these applications are being processed outside of the online system and to advise the department regarding moving this process to the online system. Research Services

Section 4.3 Ethics resources/training/support from the UREC that departments would most value

Departments were provided with a list of suggested resources/training/support (taken from previous sources of feedback), and asked to rank these in order of priority. They were also given an opportunity to make further suggestions. The findings set out in the report were highlighted to indicate the options which received the highest number of votes in each of the 3 categories (i.e. 1st choice, 2nd choice or 3rd choice).

The option which most departments listed as their first preference was for a more thorough ethics checklist and the Committee **recommended** that this be developed. Some members of the Committee also asked if this could in some way be "automated", a discussion was had and whilst this suggestion was considered to have a number of merits, it was decided that having an automated list would be too prescriptive. Research Services

Three suggestions received equal “votes” for the second choice: a training session/guidance on ethics requirements for University teaching staff, video versions of the key ethics guidance and example ethics applications (and reviews) demonstrating gold standard/best practice. Since example ethics applications received the second highest number of total votes, the Committee **recommended** that this resource be developed as priority no.2. Research Services

The Committee **recommended** that other developments should be taken forward where possible. Research Services

It was also noted by the Committee that one department felt that training on ethics should be prioritised as ‘this is something departmental leads are not best placed to provide.’ The Committee **recommended** that the department be contacted to discuss this comment further. Research Services

Section 4.4 Good practice within departments

The Committee reviewed the good practice by departments and **recommended** that these be circulated to departments, and included in the Committee’s report to Senate. Research Services

Section 4.5 Feedback regarding Faculty level support

The Committee noted the positive feedback received from the departments regarding Faculty level support and support provided by Research Services.

5. **REPORT ON BREACHES OF ETHICS POLICY FOR THE PERIOD 01.09.17 – 31.08.18**

The Secretary introduced the paper. A discussion was had in which the Committee noted that the majority of breaches occurred within research by UG/PGT students. The Committee noted that these findings supported the need for the development of online training for UG/PGT students.

The Committee welcomed the low number of ethics breaches as a percentage of total applications (less than 0.5%) whilst recognising the serious nature of any ethics breach and also recognising potential risk to the University. The Committee **recommended** that in future the ethics breaches should also be recorded as a percentage of the total category numbers (e.g. UG/PGT student, PGR student, Staff). Research Services

With regard to section 2 of the report Ms Cutler advised the Committee that, should the researchers or department require additional support, training on GDPR is available from the University Secretary’s Office and that anyone in departments requiring such training should contact Ms Cutler in the first instance.

6. **FEEDBACK FROM DEPARTMENTS: SHOULD ETHICAL REVIEW SHOULD BE UNDERTAKEN ‘BLIND’?**

The Secretary introduced the paper, explaining that this year the Annual Return Form included a question regarding the process of ‘single blind’ reviewing in the Ethics Application System (i.e. in which the applicant does not know the identity of the reviewers, but the reviewers know the identity of the applicant).

The response from departments was slightly more than 4 to 1 in favour of the current single blind review process.

The Committee discussed and noted this overwhelming majority, however the Committee also felt that transparent ethical review had many merits. The Committee noted that one method of facilitating a transparent review process is the 'review by committee' option in the online ethics system and **recommended** that this option should be brought to the attention of departments who had specified a preference for transparent review. Research Services

The Committee noted that, even if not using the 'review by committee' option, the current system allows reviewers to meet and discuss applications outside of the system, then recording these discussions in the system as part of the decision making process.

Having discussed this item at some length the Committee agreed that as a principle double blind reviewing would be the best way forward; however, this would be hard to achieve in practice (for example reviewers may well be aware of their colleagues' research activities and would be aware who had submitted the application even if a name is not included). It was therefore agreed that, for pragmatic reasons, and in view of the feedback from departments, the process should remain as a single blind process.

The Committee **recommended** that this decision be communicated to departments. Research Services

As a result of these discussions it was noted that when an application is approved no comments can be made in the system. It was felt this was a limitation of the system which should be addressed to allow reviewers to make comments on their 'Approved' decisions. Members of the Committee commented that they had marked applications as approved with suggested amendments for the purposes of providing positive feedback and praise to students on the quality of their applications. The Committee therefore **recommended** that this should be added to the list of improvements to the system. Research Services

7. **DISCUSSION POINTS FROM RECENT RUSSELL GROUP RESEARCH INTEGRITY FORUM MEETING**

The Secretary introduced the paper reporting on discussion points from a recent Russell Group Research Integrity Forum meeting in London.

A discussion was had by the Committee and consideration given to the points raised.

With regard to the more rigorous review of higher risk projects the Committee noted that within the Ethics Application System there is the option for the addition of extra reviewers or review by committee, in cases where the department was concerned about additional risk.

The Committee acknowledged that some universities have a process requiring researchers to declare why ethics approval is NOT needed however they felt that this would add significantly to workload and the Ethics Policy clearly identifies when and where appropriate ethics review should take place.

The Committee recognised that some universities require ethics review for any type of work which presents potential ethical issues (e.g. if there is a risk of harm, regardless of whether the work is classed as research or not). Committee members were of the opinion that there may be a potential for distress, e.g. within public engagement events, but that issues that may arise should be addressed during the planning of the event or project, even where formal ethics approval is not required, and no concerns in relation to this had yet come to the Committee's attention. The Committee noted that the GRIP Policy provides guidance on good research practices more generally, including those relating to public engagement. It was agreed that there is no need to change the Ethics Policy or Procedure at the current time.

It was noted by the Committee that time is allocated by some universities for ethics review as part of a Work Allocation Model. The Committee noted there is a recommended allocation of time for Faculty representatives on the Committee for their UREC duties, but not specifically for reviewing of individual applications. However, it was noted that this was likely to come under the time allocated in workload models for 'good citizenship' activities.

The Committee considered that overall the points raised are being addressed effectively by measures which are already in place within the University and the Ethics Application System.

8. INCREASING ENGAGEMENT WITH DEPARTMENTAL ETHICS CONTACTS

The Chair invited the Faculty Representatives to report on any activities which had taken place since the last meeting.

Apologies had been received from the representatives for the Faculty of Arts and Humanities and the Faculty of Engineering.

The representative for the International Faculty, Dr Vivas was unable to give feedback at the meeting due to a technical difficulty with the sound (she was able to hear the meeting but her voice could not be heard). Post-meeting the following update was sent by email: the representative had a formal meeting with the Departmental contacts. This was needed since, as reported in the previous meeting, there are two newly appointed contacts. GDPR, training needs and concerns were discussed. Fortunately, all the concerns raised were communicated in the Annual report and included in the papers for the meeting, so Dr Vivas does not have anything else to report. Three formal meetings per year have been agreed, the next one is scheduled for the end of the Autumn semester.

The representative for the Faculty of Medicine, Dentistry and Health, Dr Cooper, reported that a meeting had taken place in the Summer; this had gone well and an email had been sent to the Minute Secretary with details of some specific issues for consideration by Research Services/UREC.

The representative for the Faculty of Science, Dr Webb, advised that he had received only one response from an email sent to faculty ethics contacts to introduce himself. However, he planned to arrange a meeting in the new year if colleagues felt this was needed. The Secretary offered help and support from Research Services if required.

The representative for the Faculty of Social Sciences, Dr Bates, reported that she was still liaising with Research Services to arrange an ethics drop in session, and there was an intention for this to take place early in 2019.

9. **UPDATE ON ETHICS QUERIES RECEIVED**

The Secretary updated the Committee on ethics queries which had been received.

- An enquiry had been received regarding whether a generic application could be developed to cover a group of research projects in the global south where students would be interviewing participants. The Committee discussed this and it was felt that one application covering all of these projects would be too generic, since each project is likely to be unique and raise its own particular issues because of the variety of participants and the country-specific considerations. Therefore, applications should be submitted for each individual project.

- An enquiry had been received regarding the use of material obtained from a public archive and whether consent is necessary to publish the names and quotes from public service staff which are minuted in public archives (in this case, members of a committee where the researcher wanted to highlight their part in a decision making process within local government). Dr Bates noted that the introduction of any additional restrictions in this area could have serious implications for some areas of research. The Committee also felt that each occurrence of this type of enquiry should be dealt with on a case by case basis. In this instance the Committee **recommended** that Research Services should advise the researcher to obtain consent from the people involved in the committee who they were wishing to quote and if this is not possible then this case should be re-considered by the Chair and Secretary. The Committee also **recommended** that Research Services should contact Matthew Zawadzki, Research Records Manager in the University Secretary's Office to ask for guidance regarding these matters. Research Services

- It was noted that there had been further discussion regarding the publication of Tweet IDs, following some consultation on guidance that had been identified and which was mentioned at the meeting in September. The Committee agreed that further consideration of this issue was required therefore **recommended** that a paper be prepared for a future meeting. Research Services

10. **DATE OF NEXT MEETING**

13 February 2019

11. **ANY OTHER BUSINESS**

No other business was raised.

These Minutes were confirmed at
a meeting held on.....
.....Chairman