

**Academic Research & Innovation/Enterprise
Ethics Framework Document**

Cardiff School of Management

April 2020

1. Introduction

The purpose of this document is to establish an Ethical Framework for Cardiff School of Management that guides and supports staff and students towards ensuring that the School complies with the correct ethical practices as outlined under the University Ethics system. The Framework applies to all CSM programmes and students whether studying at home or internationally.

This framework aims to protect staff, students and participants who undertake research and/or innovation/enterprise projects where primary data is collected, used and subsequently analysed. This framework applies to all academic staff, postgraduate and undergraduate students when they plan to undertake internal or external research, innovation/enterprise projects, certain teaching exercises and/or innovation/enterprise work.

Issues of morality, safety and personal and institutional liability affect the university at many levels. As a public body and responsible employer, it must act, and be seen to be acting, with propriety and care for the welfare of staff, students and the wider public and has a duty to ensure that its graduates have been educated to uphold high standards of ethical conduct in research.

Research and innovation/enterprise projects can be defined as all research and consultancy proposals involving primary data gathering and analysis (including undergraduate dissertation proposals) and, as such, will include a section on ethical considerations of the methodology to be employed. Where research studies have included collection of empirical data prior to the proposal stage, a section outlining ethical considerations must be included and provided as an appendix with the research proposal. The School's Ethics Committee will address these factors and concerns.

In order to facilitate timely consideration of applications for ethics approval, CSM has two systems for reviewing applications. The first system applies to all taught programmes and utilises a devolved panel approach (see Appendix A). The second applies to all research based study and all staff research proposals (see Appendix B). In this instance all applications are reviewed by the School's Ethics Committee (SEC). The terms of reference defining SEC's role are given in a separate document and attached as an Appendix in this document (Appendix C). The operational context for the School's Ethics Committee is that it will act as a sub-committee of the University Ethics Committee and report to it as required.

Devolved Research Ethics Approval Panels (DEAP) are a sub-committee of SEC and have the responsibility for receiving research applications for their own modules and for determining whether approval can be given or referral to the SEC is required. The School Ethics Coordinator will be responsible, in collaboration with other members of staff for developing appropriate disciplinary and professional codes of ethical practice for DEAPs. Staff development for Link Tutors, academic and appropriate administrative staff is integral to the development of the research ethics process within CSM.

Responsibilities of persons submitting research proposals

It is the requirement of any person responsible for planning to undertake a research project, including bids for funding, within the School to consider possible ethical implications of that project. Typically, the projects that would require ethics approval would be:

- a) All undergraduate and taught postgraduate dissertation/final project work
- b) Postgraduate Research
- c) Staff-led research
- d) Innovation/Enterprise projects
- e) Certain teaching activities where consent is required from companies with regards to specific company sensitive information etc.
- f) All assessed work in which there is a requirement for primary data collection

All projects, including undergraduate proposals will need to be vetted at a subject level via the appropriate DEAP. It is the responsibility of the Module Leader and the other members of the panel to identify any possible areas within their subject which may raise ethical issues. It will, therefore, be the responsibility of all persons to incorporate into research methods training at all levels an explicit consideration of the ethical codes which apply in their discipline, in order that students become explicitly aware of the need to be working within this code.

Proposals must, therefore, include a rationale for the methodology selected indicating that ethical practices will be adopted and how they will be assured. With regard to proposals arising from engagement with other Schools, the proposals should be viewed by the relevant School in which the ethical issue will arise. Responses to these may highlight a need to refer the proposal to the University Ethics Committee in accordance with the stepped approach below. A copy of the University's standard ethics form is included in Appendix D.

Researchers should therefore:

- a. Satisfy the subject staff member responsible for vetting at a local level that all ethical considerations have been addressed for undergraduate and taught postgraduate proposals; **or**
- b. Satisfy the School Ethics Committee that all ethical considerations have been addressed for all other proposals, including postgraduate research and staff projects; **or**
- c. Obtain ethical approval for the research from the University's Ethics Committee for specific factors, such as use or involvement of deception or vulnerable participants.

All applications for funding from the University by postgraduate research students and staff, all submissions for external funding, and all submissions to School or University Research and Innovation Committees, should be accompanied by a statement of the relevant ethical considerations and implications. Where the SEC considers that the ethical implications of a research proposal require further investigation, the proposal will be submitted to the University's Ethics Committee for further consideration.

Procedures

1. The School Ethics Committee (SEC), when reviewing such proposals, will consider whether ethical issues have been appropriately addressed or resolved. If any proposals fail to meet guidelines, or are deemed to require expert input regarding ethical issues, the SEC will submit these research proposals to the University Ethics Committee.
2. Confirmed approval from the Ethics Committee or gatekeeper, at Subject, School or University level must be received prior to the start of the research project. Chair's Action, where appropriate, after fulfilment of meeting additional requirements in the research proposal as outlined after initial submission, may be taken.
3. Any changes to the specification of a project, which may raise additional ethical issues, are subject to further application to the Committee for renewed approval. This may be particularly relevant in relation to authoring texts where decisions to include an additional, or different, mode of data collection may be become necessary after the submission and approval of the original proposal.
4. To ensure that no members of the Committee adjudicate on proposals in which they may be personally involved.

2. CSM Ethics Structure and Decision Process

The SEC will ensure that the formal UEC terms and conditions are correctly and robustly applied and the ethics management structure is followed as outlined in Appendix A for both taught and research based degree programmes.

3. Decisions Made by Panels and Committee

The current forms for ethical applications are drafted for institution-wide use and indicate that projects can be approved, approved in principle, deferred, not approved or rejected. Devolved ethics panels and SEC will make one of the following decisions for each considered application:

- a) Approve
- b) Approve in principle (subject to specific minor issues being addressed)
- c) Defer (application is incomplete)
- d) Not approved (where the application is returned for major revision)
- e) Reject (where the project is unethical)

In addition a DEAP may also use the option "Defer to SEC" where it feels unable to form an opinion as to whether the application is (or can be made) ethically sound.

Ethical approval, where granted, will normally be for period specified on the application. It is the responsibility of the Principal Investigator to abide by the conditions of approval; this includes application for extension of approval. Approval may be granted for periods of up to 5 years in circumstances where projects are designed to last longer or where their implementation depends on securing funding from recognised organisations such as Research Councils UK (RCUK)

It should be noted that although this document and the corresponding institutional forms for ethics application refer to ethical approval, the approval granted either by a panel or by

SEC reflects the expression of a favourable ethical opinion made on the basis of the information provided by the applicant. Staff and students in the School should not proceed with projects if during the course of their conduct they come across circumstances that may require further ethical consideration. If after receiving approval investigators become concerned about the ethics of their activities they should contact the chair of the panel or committee that granted approval in the first instance for further guidance.

5. Health, Safety and Risk Assessment

The Health and Safety aspects of activities requiring ethical consideration are covered by the School Health and Safety Policy. It is also a requirement for applicants to assess risk in the context of ethics and to complete relevant Risk Assessment documents. Consideration of risk must be undertaken in all application specifically via sections C1 and C2 of the Research Ethics form.

Further information on the School's Health & Safety Policy and Guidance on Risk Assessment can be found on the Staff Portal.

6. Research Requiring Third Party Research and Innovation/Enterprise Ethics Committee Approval

SEC will not endorse research or projects that require approval from a nationally recognised Research and Enterprise Ethics Committee (REEC) until such approval has been granted. In all cases a copy of the relevant REEC favourable ethical opinion must be submitted to the School for consideration. Where a Principal Investigator on the REEC-approved research is not from Cardiff Met, evidence supporting the role of Cardiff Met in the project must also be provided.

Where the research project is being undertaken in conjunction with another institution ethical approval can be obtained from any participating institution, usually that of the Principal Investigator. If the approval is not being sought via Cardiff Metropolitan University then the SEC must receive confirmation that ethical approval has been given before any research is undertaken.

In cases where research is undertaken within the NHS and that the appropriate NHS Unit has decided that proposed activities do not require REEC approval (e.g. service evaluations), a letter specifying exemption must be provided from the relevant unit (e.g. Research & Development Committee) together with the ethics application.

Other agencies may also have specific requirements for ethical approval (e.g. Police, Ministry of Defence, etc). In these instances applicants must notify the relevant devolved ethics panel with evidence of written permission.

Where the third party is a health care institution outside the UK, approval from a relevant recognised REEC in that country will be required.

7. Appeals and Complaints Procedure

Applicants to SEC and Devolved Ethics Panels have the right of appeal against a decision. The process for such appeals and any complaints can be found in Appendix E.

8. Audit of Approved Projects

SEC will undertake a planned programme of annual audits of projects. Audit of approved projects from Devolved Ethics panels will be an annual agenda item for SEC. Quality of panel decision making will be assessed by consideration of the decisions made. Audits will be used to improve the ethics process and to inform staff development activities.

9. Composition of Devolved Ethics Approval Panels and role of Supervisors

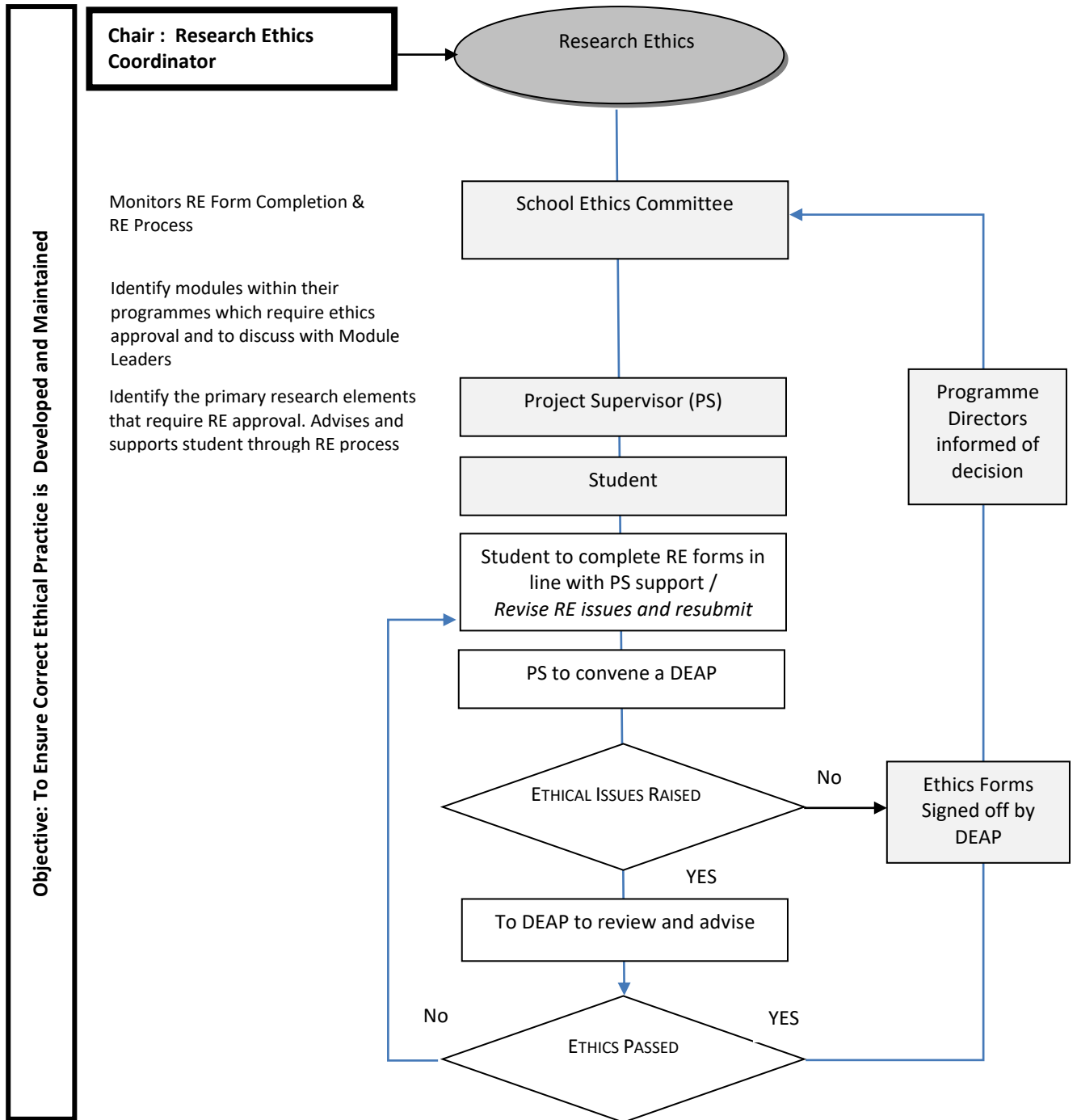
A typical devolved ethics panel would comprise the research project supervisor and two other persons, typically the module leader and a member of the CSM Ethics Committee. All three will have received Cardiff Metropolitan University or CSM ethics training. The role of the supervisor in the DEAP process is presented in Appendix E.

DEAP procedures for UK collaborative partners are detailed in *Appendix F*

DEAP procedures for Overseas collaborative partners are detailed in *Appendix G*

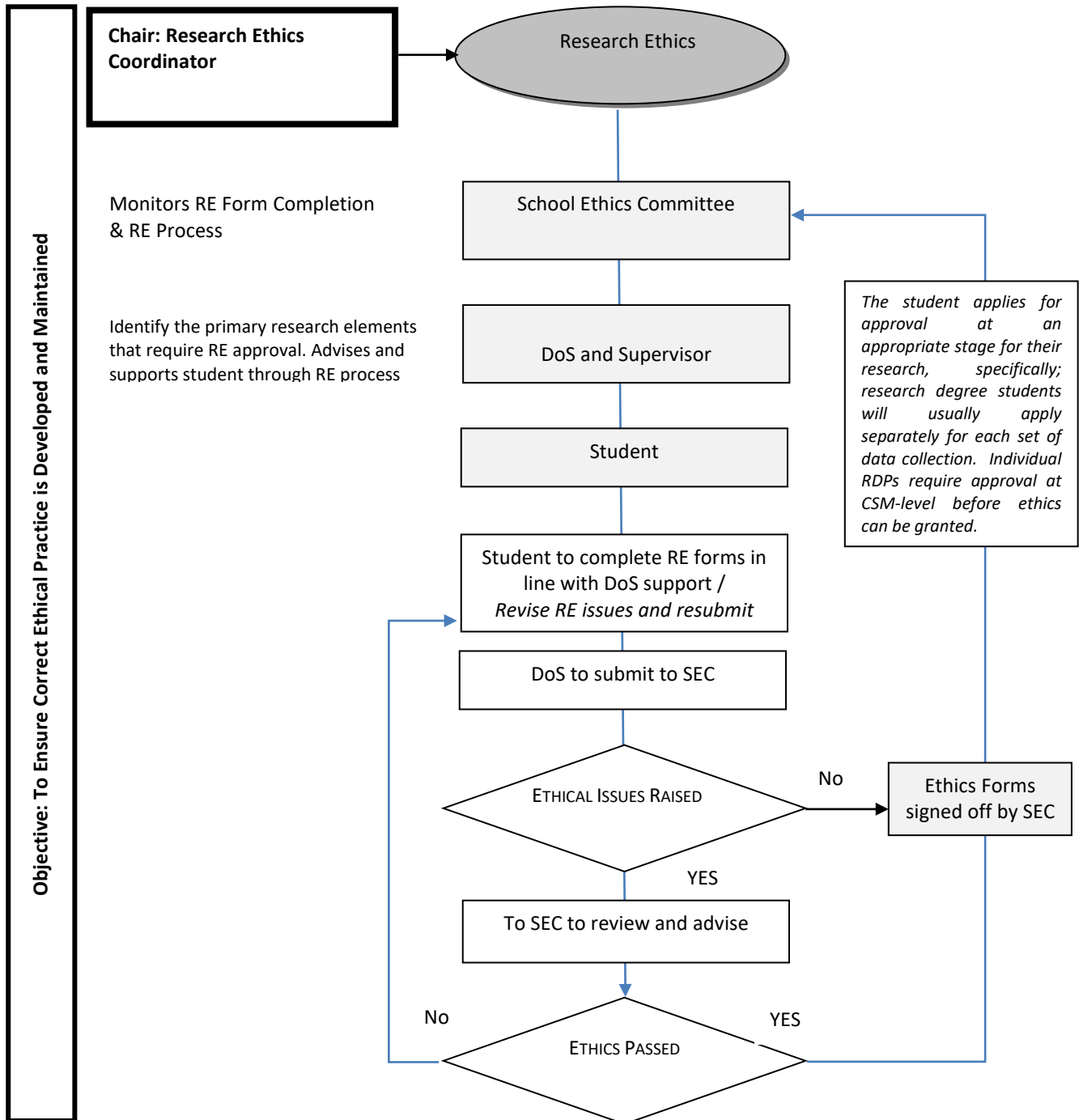
Appendix A

RESEARCH ETHICS PROCESS (TAUGHT PROGRAMMES BA, MBA, MSc)



APPENDIX B

RESEARCH ETHICS PROCESS (RESEARCH DEGREES AND ALL STAFF RESEARCH)



APPENDIX C

Terms of reference for CSM SEC

The School Ethics Committee has responsibility for upholding the general principles laid down in Cardiff Met's Ethics Framework and for ensuring that all research involving human participants carried out by staff and students of the School, within Cardiff Met or at other locations, conforms to the highest ethical standards. Reporting to the University Ethics Committee, and the School SMPT and School Research & Innovation Committee as necessary, it:

1. Ensures that Cardiff Met's Ethics Framework is disseminated to staff and student members,
2. Considers the compliance of the School with the sections of the Ethics Framework relevant to its Research, Enterprise and Learning & Teaching activities.
3. Advises the School Management and Planning Team about actions needed to comply with Cardiff Met's Ethics framework;
4. Establishes, implements and keeps under review codes of practice, procedures and guidelines for the consideration, approval and monitoring of research projects involving human participants which are undertaken by members of staff and/or students;
5. Makes decisions on ethical matters pertaining to the conduct of research, both individual and collaborative;
6. Establishes procedures for appeals against decisions made by the Ethics Committee;
7. Puts in place training for those involved in considering applications under this machinery and, as and when appropriate, for those undertaking research involving human participants;
8. Reports annually to the University Ethics Committee.

Frequency of meetings: **At least:** Once a Term

Membership

General membership

Ethics Co-ordinator (Chair)*	1
Associate Dean (Research)	1
Deputy Dean (Learning and Teaching)	1
Associate Dean (Enterprise)	1
Associate Dean (Partnership)	1
Dean of School (Ex officio)	1
1 Academic Associate (approved by the Chair)	1
Module Leaders with DEAP applications approved	All
Up to 4 co-opted members (approved by the Chair)	4

Additional membership for consideration of Research Ethics:

Member of an alternative school ethics committee or UEC

*If the School does not have an Ethics Co-ordinator, the Associate Dean (Research) shall act as Chair

Organisation

The School may organise meetings of the School Ethics Committee considering applications for ethical approval to take place at a different time from its meetings to consider other aspects of the School Ethics Committee's work, and may co-opt additional members from the School for these meetings. The School may also authorise (subject to UEC approval) substructures, panels or subcommittees to carry out some or all of the reviews, and approve applications.

Appendix D - Copy of Research Ethics Form (v9 February 2020)



Cardiff
Metropolitan
University

Prifysgol
Metropolitan
Caerdydd

APPLICATION FOR ETHICS APPROVAL

When undertaking a research or innovation project, Cardiff Met staff and students are obliged to complete this form in order that the ethics implications of that project may be considered. The document ***Ethics application guidance notes*** will help you complete this form and is available from the Ethics Governance Section of the Cardiff Met website. The School or Unit in which you are based may also have produced some guidance documents which you can access via your supervisor or School Ethics Coordinator.

PLEASE NOTE:

Participant recruitment or data collection MUST NOT commence until ethics approval has been obtained.

PART ONE

1A: GENERAL INFORMATION	
Name of applicant:	Click here to enter text.
Supervisor (if student project):	Click here to enter text.
School / Unit:	Click here to enter text.
Student number (if applicable):	Click here to enter text.
Programme enrolled on (if applicable):	Click here to enter text.
Project Title:	If using a working title, it should convey what the project is about
Expected start date of data collection:	Click here to enter a date.
Approximate duration of data collection:	Click here to enter text.
Funding Body (if applicable):	Click here to enter text.
Other researcher(s) working on the project:	If your collaborators are external to Cardiff Met, include details of the organisation they represent.
Will the study involve NHS patients or staff?	If yes, attach a copy of your NHS application to this form
Will the study involve human samples and/or human cell lines?	Choose an item.

1B: Does your project fall entirely within one of the following categories:	
Desk based, involving only documents and not involving the collection of data from participants	Choose an item.
Laboratory based, not involving human participants, human samples, animals or animal derived material	Choose an item.
Practice based not involving human participants (eg curatorial, practice audit)	Choose an

	item.
<p>Answering YES to any of these questions indicates that the project does not include any participants and you will not therefore be collecting participant data.</p> <p>If this is the case, please provide a short (150 words) non-technical summary of the project, complete the Declaration at the bottom of the form and forward this form to your School Ethics Committee (or equivalent).</p> <p>No further information regarding your project is required and you do not need to complete any more sections of this form.</p> <p>If you have answered NO to all of these questions, please proceed to 1C.</p>	
Non-technical summary of the project:	
Click here to enter text.	

1C: Does your project fall entirely within one of the following categories:	
Compulsory projects in professional practice (eg Initial Teacher Education)	Choose an item.
<p>A project for which NHS approval has been obtained</p> <p>NB If this is the case, please ensure that you submit copies of the following with this form:</p> <ul style="list-style-type: none"> any questionnaires to be used participant consent / asset form and withdrawal form participant information sheets 	Choose an item.
<p>A project which is not compulsory in professional practice and has gained external ethics approval from a body other than the NHS.</p> <p>NB If this is the case, please ensure that you submit a copy of the approved ethics application with this form.</p>	Choose an item.
<p>If you have answered YES to any of these questions, please provide a short (150 words) non-technical summary of the project and complete the rest of Part One of this form. You do not need to complete Part Two.</p> <p>Forward your completed form, along with any additional documents required (as indicated above) to your School Ethics Committee (or equivalent).</p> <p>If you have answered NO to all of these questions, please complete the rest of this form including Part Two</p>	
Non-technical summary of the project:	
Click here to enter text.	

1D: DATA COLLECTION AND STORAGE	
What types of data will you collect or create?	
Click here to enter text.	
How will you manage access to and security of the data?	
Click here to enter text.	
<p>Will the data collected be subject to the data retention protocols of any of the following bodies?</p> <ul style="list-style-type: none"> Human Tissue Authority (HTA) Health and Care Research Wales (HCRW) Applications involving the NHS which will be submitted via IRAS 	
Yes <input type="checkbox"/>	
<p>For any project which is subject to the data retention protocols of an external body listed, you must develop a data storage plan to be submitted alongside this document for consideration by your School or Unit Ethics Panel.</p>	

No <input type="checkbox"/> Please confirm that the data collected will be stored in a manner which complies with Cardiff Met requirements via one of the following statements.	
STATEMENT 1: FOR STUDENTS ON TAUGHT COURSES I confirm that any non-anonymised data related to research participants will only be stored on OneDrive and that all data held elsewhere will be deleted, unless it is anonymised.	<input type="checkbox"/>
STATEMENT 2: FOR STAFF APPLYING ON BEHALF OF STUDENTS ON TAUGHT COURSES I confirm that all students covered by this application are aware of their obligation to ensure that non-anonymised data related to research participants must only be stored on their Cardiff Met student OneDrive account and that all data held elsewhere must be deleted, unless it is anonymised.	<input type="checkbox"/>
STATEMENT 3: FOR RESEARCH STUDENTS AND STAFF I confirm that any non-anonymised data related to research participants will be stored in a secure manner (using a platform such as OneDrive or FigShare) and that all data held elsewhere will be deleted unless it is anonymised.	<input type="checkbox"/>

DECLARATION: I confirm that this project conforms with the Cardiff Met Research Integrity & Governance Framework I confirm that I will abide by the Cardiff Met requirements regarding confidentiality and anonymity when conducting this project. STUDENTS: I confirm that I will not disclose any information about this project without the prior approval of my supervisor.	
Signature of the applicant:	Date:
FOR STUDENT PROJECTS ONLY	
Name of supervisor:	Date:
Signature of supervisor:	

Research Ethics Committee use only	
Decision reached: Click here to enter text.	
Project reference number: Click here to enter text.	
Name: Click here to enter text.	Date: Click here to enter a date.
Details of any conditions upon which approval is dependant: Click here to enter text.	

PART TWO

If you haven't already done so elsewhere on this form, in the box below, provide a short (150 words), non-technical summary of the project.	
Click here to enter text.	
A RESEARCH DESIGN	
A1 Will you be using an approved protocol in your project?	Choose an item.
A2 If yes, please state the name and code of the approved protocol to be used ¹	
Click here to enter text.	
A3 Describe the research design to be used in your project	
In this section, include details (as appropriate) of: - research method(s); - sample and sampling; - participants including recruitment methods, activities to be undertaken, time commitment, details of any proposed payments; - analytical techniques If your project does involve the use of an approved protocol, much less detail will be required but you should indicate which areas of the project are covered by the protocol.	
A4 Will the project involve deceptive or covert research?	Choose an item.
A5 If yes, give a rationale for the use of deceptive or covert research	
Click here to enter text.	
A6 Will the project have security sensitive implications?	Choose an item.
A7 If yes, please explain what they are and the measures that are proposed to address them	
Click here to enter text.	

B PREVIOUS EXPERIENCE	
B1 What previous experience of research involving human participants relevant to this project do you have?	
Click here to enter text.	
B2 Student project only	
What previous experience of research involving human participants relevant to this project does your supervisor have?	
Click here to enter text.	

C POTENTIAL RISKS	
C1 What potential risks do you foresee?	
Include details of risks to the participants, the researcher and the project as a whole.	
C2 How will you deal with the potential risks?	
Click here to enter text.	

When submitting your application you **MUST** attach a copy of the following:

- All information sheets
- Consent/assent form(s)
- Withdrawal of consent form

An exemplar information sheet, exemplar participant consent form and exemplar participant withdrawal form are available via the research section of the Cardiff Met website (see section on

¹ An Approved Protocol is one which has been approved by Cardiff Met to be used under supervision of designated members of staff. For details of protocols in use in your School or Unit, contact your Ethics Coordinator

Ethics Governance). These are based on good practice and will be useful in the majority of cases. However, it is recognised that in some cases a project will be subject to requirements from an external body. Use of these exemplars is therefore not obligatory.

Appendix E

Appeals Procedure

1. Appeals against Devolved Ethics Approval Panel Decisions

Where an application has been rejected by a Panel, the applicant has the right to request that the decision is reconsidered by the relevant Devolved Ethics Panel. Appeals should be made via the CSM Ethics Coordinator setting out the causes for concern. This communication should contain sufficient information to allow the grounds for appeal to be clearly understood. If the Devolved Ethics Panel revokes its original decision, the appeal can be upheld without a hearing.

If that Panel affirms its original decision, the applicant has the right to appeal to SEC in which case the appeal will be received by SEC as written. SEC will then convene a hearing and invite the applicant to meet with them. If additional expertise is required, the Chair may invite up to two members of staff with relevant expertise but who have not been involved in the initial decision to join the panel. After the hearing, SEC will determine whether the applicant is successful. It is the duty of the Ethics Appeal Panel to provide clear justification for its decision regarding whether an appeal has been successful or unsuccessful.

The Panel must consider any written appeal within 10 working days and SEC within 20 working days. All appeals must be made within 2 months of the original decision being relayed to the applicant /supervisor.

2. Appeals against SEC Decisions

Where an application has been rejected by SEC, the applicant (or supervisor if the applicant is a student) has the right to request that the decision is reconsidered by the Committee. Appeals should be made to the Chair of SEC via the University's Ethics Coordinator, setting out the cause(s) for concern. This communication should contain sufficient information to allow the grounds for appeal to be clearly understood. If the SEC revokes its original decision, the appeal can be upheld without a hearing.

If SEC affirms its original decision, the applicant has the right to appeal to UEC in which case the appeal will be forwarded by SEC to the Chair of UEC with the justification for its decision.

SEC must consider any written appeal within 20 working days. Appeals must be made within 2 months of the original decision being relayed to the applicant.

3. Complaints

Complaints against the SEC Panel should be made following the University published complaints procedure

Appendix F

Responsibility of Supervisors of undergraduate and taught postgraduate student research projects which will be reviewed via CSM Devolved Ethics Approval Panels (DEAP).

Prior to a devolved ethics panel meeting it is the responsibility of the research project supervisor to instruct their supervisees in completing the Application for Ethics Approval correctly. The research project supervisor is responsible for;

1. endorsing their supervisee's ethics application by the inclusion of a Devolved Ethical Approval Panel (DEAP) Application Summary (attached) ,
2. initiating the convention of an appropriate devolved ethics panel to consider the application,
3. ensuring that the application for Ethical Approval is considered and returned in a timely fashion, normally within two weeks of submission (teaching period).

Following a DEAP meeting it is the responsibility of the research project supervisor to relay any comments made by the panel to the supervisee and to provide guidance and support to address those comments. The supervisor should retain an electronic copy of the final approved application.

Devolved Ethical Approval Panel (DEAP): Application Summary

Student Name: _____ Student Number: _____

Module Name: _____ Module Number: _____

Programme Name: _____ Supervisor Name: _____

To be completed by student <u>and</u> supervisor before submission to DEAP	Student Signature:		Supervisor Signature:	
	Yes	N/A	Yes	N/A
Application for ethics approval	[]	-	[]	-
Participant information sheet	[]	[]	[]	[]
Participant consent form	[]	[]	[]	[]
Pilot interview/focus group questions	[]	[]	[]	[]
Pilot questionnaire/s	[]	[]	[]	[]
Letter/s to participating organisation/s	[]	[]	[]	[]
Confirmation of interviewee participation	[]	[]	[]	[]
Participant withdrawal form	[]	[]	[]	[]

First Submission []

Resubmission []

Date: _____

For use by the devolved ethics approval panel:

Panel Members Name Signature

Module leader: _____

Supervisor: _____

CSM Ethics Committee Representative:

Date: _____

Date of Reassessment: _____

Outcome:

Project Approved [] Reference number: _____

Project Approved in Principle []

Decision deferred (application not ready/incomplete) []

Project Not Approved (major revisions) []

Project Rejected []

Comments for projects not approved:

*The original to be retained by the supervisor and a copy given to the student and module leader. In the case of a resubmission being required this **original form** should be submitted with the resubmission.*

Appendix G

Composition of a Devolved Ethics Approval Panel (DEAP) in Collaborative Partner Institutions.

A typical DEAP in a CPI would comprise the research project supervisor and two other persons typically the module leader and a third person whose role is to ensure that CSM's ethics procedures are complied with and that parity in decision making is maintained across all CSM DEAPs in their institution. This person may be a member of academic or administrative staff and will have been identified by the CPI in conjunction with their CSM link tutor. The CSM link tutor will ensure that this person is kept up to date with all of Cardiff Metropolitan University and CSM's ethical procedures. All members of the panel will have received Cardiff Metropolitan University or CSM's ethics training.