



TITLE	REF	VERSION	
Research Ethics Approval and Review Procedure - Students	LSPRO042	2	
DEPARTMENT	Higher Education Team		
DATE	June 2025	REVIEW DATE	June 2028

Research Ethics: Approval and Review Procedure

Students

Procedure Statement

Activate Learning is committed to a research ethics approval and review process that is clear, fair and equitable, in line with our Research Ethics Policy. This procedure aims to mitigate potential risks by ensuring students are clear about their ethical responsibilities when undertaking research.

Background

1. Research ethics is an integral element of research. This procedure recognises the need for appropriate scrutiny of all research proposals to ensure that ethical standards are met.
2. Activate Learning understands the importance of a rigorous approach to research ethics approval and review, both in terms of quality of research and organisational reputation.
3. A thorough understanding of research ethics is fundamental to the whole research process, from planning to publication.

Purpose

The purpose of this document is:

1. To guide students to understand activities that should be classified as research.
2. To enable students, supervisors, and reviewers to assess risks relating to proposed research.
3. To set out the stages of the research ethics approval and review, including any associated documentation, identify the possible outcomes, and any subsequent actions required.
4. To improve the quality of student research within the organisation.
5. To offer a supportive and rigorous framework for research ethics.
6. To protect all individuals involved in the research process.

Definitions

For the purposes of this procedure, terms are defined as follows:

Anonymisation: The process of transforming identifiable data into non-identifiable data.

Confidentiality: Data is confidential if participants provide personally identifying or sensitive information, but the connection between participant and results is not shared or accessible by any means.

Informed consent: For consent to be informed sufficient information about the research must be given to the participants, ensuring that there is no explicit or implicit coercion. Prospective participants must have the necessary capacity to make such a decision about involvement and be able to act freely and voluntarily.

K-anonymity: A data anonymisation technique aiming to protect the privacy and/or identification of individuals by ensuring each person is indistinguishable or 'hidden'.

Personal data: Any information that can be used to directly or indirectly identify the person, including a name, photo, email address, bank details, social networking posts, medical information or a computer IP address.

Primary research: The methodological process whereby researchers collect data directly rather than using data collected from previous research or existing datasets. It can include surveys, interviews, focus groups, observations etc.

Research: Research is defined as 'a process of investigation leading to new insights, effectively shared'. It may involve primary research and/or secondary research.

Research ethics: Ethics in the research context refers to the moral principles guiding research from its inception through to completion and beyond to dissemination and ongoing data storage. Research ethics are taken to include the way individual participants and their data are treated, and the quality and purpose of the research undertaken in terms of design, collection, analysis and final publication.

Risk: Any new research activity is assessed for potential risks through the Research Ethics Approval and Review Procedure. Risks may be applicable to the student acting as a researcher, research subjects (humans, animals and the environment), the general public, and Activate Learning's reputation and financial and legal liability.

Risk threshold: A research proposal may cross the risk threshold in the approval process if there is insufficient evidence of mitigation of apparent risks, if there is insufficient awareness of potential risks or if the research activity itself poses risks that need further scrutiny, consideration or mitigation to reduce the possibility of upset or harm to any of the stakeholders.

Secondary research: The methodological process whereby researchers use already existing research material, either from previous research or existing datasets.

Student: Any person who has registered on a programme of study with Activate Learning, which can include undergraduate and postgraduate programmes. This also includes students from elsewhere visiting as part of an exchange or similar programme.

Vulnerable participants: Vulnerable populations include under 16s, people with learning or communication difficulties, patients in care, people with mental health difficulties, people in custody or on probation, and people engaged in illegal activities, such as drug abuse. A vulnerable or at-risk adult is an adult who needs community care services because of mental or other disability, age or illness and who is, or may be, unable to take care of themselves against significant harm or exploitation.

Roles and Responsibilities

Researcher

- The student is responsible for completing all the relevant documentation to the required standard with full disclosure of the aims and methods of the proposed research.
- The student must immediately notify the Faculty/Departmental Reviewer of any substantive changes in the research once it is underway.

Research Supervisor

- The Research Supervisor is responsible for ensuring that the research meets all relevant legal or regulatory requirements.
- The Research Supervisor is expected to train their students on the principles and practice of Research Ethics in advance of any proposals being submitted.
- The Research Supervisor is responsible for setting up, reviewing and deciding on the outcomes of Form FRE1 for their students.
- The Research Supervisor will work with their students to ensure the accurate and comprehensive completion of Form FRE1 and, where necessary, Form FRE2.
- The Research Supervisor will liaise with the Faculty/Department Reviewer at all stages of the process, keeping them informed of any potential or developing risks.

Faculty Reviewer

- The primary task of the Reviewer is to review and approve research proposals and their supporting documentation, paying particular attention to the safety and wellbeing of the participants and the researchers. The Reviewer ensures that all research undertaken within their faculty/department has full and appropriate ethical approval.
- A decision to offer ethical approval does not imply expert assessment of all possible ethical issues, as the Reviewer can only refer to the information supplied by the researcher in coming to their conclusion and the ultimate responsibility for the ethical conduct of the research throughout the process lies with the individual researcher.
- The Reviewer is a serving member of the Research Ethics Committee.
- The Reviewer undertakes appropriate training for the role, supported by the Research Ethics Committee.
- The Reviewer is responsible for ensuring that students receive adequate and appropriate research ethics training within their Faculty/Department.
- The Reviewer must not approve any research proposal where they are also in the role of Research Supervisor. They must gain approval from a peer Reviewer instead.
- The Reviewer will forward to the Research Ethics Committee any research proposal deemed to be high risk (see definitions above). Only the Research Ethics Committee can give approval for high-risk research.

Research Ethics Committee

The Research Ethics Committee has an oversight of all ethical considerations and will review activities to support, implement, and embed the highest standards of research integrity in accordance with all relevant bodies.

The Research Ethics Committee comprises:

- Chief Strategy Officer (Chair)
- Group Director of Strategy and Innovation
- Director of Higher Education
- HE Programme Co-Ordinator
- Group Head of Risk and Resilience
- Diversity and Inclusion Manager

All members of the Committee will maintain appropriate confidentiality regarding all aspects of the Committee's work.

The Committee will meet predominantly on an ad hoc basis to ensure applications are considered in a timely manner.

Personal Data Protection

1. Personal data obtained or gathered should be sufficient for the purpose of research but no more extensive.
2. Appropriate and considered choices should be evident for data gathering and protection throughout the research activity, including recording, processing, storing and transferring data.
3. Personal data should be rendered functionally anonymous, making the risk of re-identification negligible, using de-identification, randomisation and suppression of small values that might lead to re-identification (*k*-anonymity), where appropriate.
4. All research proposals that involve personal data must include a comprehensive Data Protection Impact Assessment, which will be reviewed by the Research Ethics Committee.

Equality, Diversity and Inclusion

1. Any research proposal using human participants, or their data, is considered through the lens of equality, diversity and inclusion.
2. Promotion of equality of opportunity and freedom from discrimination on the grounds of protected characteristics should be explicit within any proposal.
3. Vulnerable participants are evidently given particularly careful consideration in the research design and process.
4. All research proposals that involve human participants must include a comprehensive Equality Impact Assessment, which will be reviewed by the Research Ethics Committee.

Participant information and Consent

- Information for participants should be provided in an accessible and comprehensive format, typically in written format (see attached participant information and consent templates)
- Where personal data is processed, a Privacy Notice must be given to research participants.
- Time should be allowed for the participant to consider their choices and to discuss their decision with others if appropriate.
- Research should not normally proceed until participants have indicated their consent and this has been recorded. This can typically be done by asking participants to sign a consent form, but

in some cases, it may be more appropriate (and more ethical) to use alternative approaches to record consent.

Recruitment of participants

When recruiting participants for research, the student must ensure that whatever methods are used, participation is truly voluntary. There should be no coercion, either explicit or implicit. Ideally, individuals should have to act to take part, rather than having to decline a direct approach which could be uncomfortable. Conflict of interest and power relationships should also be considered to ensure participation is truly voluntary.

Recruitment materials should include:

1. Participant information as per that stated on the attached participation information and consent templates
2. Details of any rewards or incentives
3. Any general exclusion criteria

The Research Ethics Approval Process

Stage 1 – Identification and Scope

- A student may find that they are planning research because they are undertaking a qualification that involves a research element. Their awarding organisation or Higher Education Institution (HEI) may have its own ethics process, which should be followed. The student's Research Supervisor informs the Faculty/Departmental Reviewer of any approvals. The Reviewer should keep accurate records of all external awarding organisations' or HEI ethical approvals for students.
- If the awarding organisation or HEI does not have its own ethics process, research ethics approval is required from Activate Learning.

Stage 2 – Submission for initial approval

- Those completing a qualification where an external awarding organisation or HEI is not providing full ethical approval will be expected to submit Form FRE1 to the Research Supervisor.
- The Research Supervisor risk assesses the submission.
- If, as a result of the responses in Form FRE1, the research proposal is deemed not to cross the risk threshold by the Research Supervisor, the student may undertake their research as outlined.
- If, as a result of the responses in Form FRE1, the research proposal is deemed to cross the risk

threshold by the Research Supervisor, the student is required to complete and submit Form FRE2, for Stage 3 detailed approval to take place.

Stage 3 – Submission for detailed approval

- Those required to submit Form FRE2 will work with their Research Supervisor to ensure the accurate and comprehensive completion of the form and associated documentation i.e., the Data Protection Impact Assessment, the Equality and Diversity Impact Assessment, consent forms etc.
- All data protection requirements as outlined in Activate Learning's Information Security and Data Protection Policy and Procedure must be adhered to.
- Once the research supervisor agrees with the student that Form FRE2 and associated documentation are ready for full approval, they are submitted to the Faculty/Departmental Reviewer.
- The Reviewer will respond to the Form FRE2 request within 10 working days.
- Approval is granted for 18 months, unless an extension is requested, in which case increments of a further 6 months may be granted by writing to the Research Ethics Committee.
- All records held for a minimum of six years.
- Where approval is given, written confirmation will be sent to the researcher within one week of the meeting, outlining any recommendations that have arisen from the Reviewer's decision.
- Where approval is not given, clear reasons for the decision will be sent to the student with an invitation to resubmit where appropriate.
- Should any significant amendments be required once the research is underway, the student must halt the research and notify the Reviewer immediately to obtain further approval.
- Any adverse events or reactions must be notified by the Reviewer to the Research Ethics Committee immediately.
- **No research may be undertaken until full written approval has been officially given by the Reviewer.**

Stage 4 – Review and sampling

- Each Reviewer will share with the Research Ethics Committee their caseload of research ethics approvals.
- Approved FRE2 Forms for each Reviewer will be sampled by two members of the Research Ethics Committee at least twice a year.
- Constructive and formative feedback will be given to each Reviewer after each sampling procedure.

Complaints

- There is no appeal against the decision of the Reviewer. Complaints about the procedural elements of this process can be made via the Student Complaints Procedure.

References

- [British Educational Research Association \(BERA\)](#)
 1. [Health Research Authority \(HRA\)](#)
 2. [Research Excellence Framework \(2014\)](#)

Appendices

Appendix One: Research Ethics Approval and Review Flowchart

Associated Documents

- [Research Ethics Policy](#)
- [Research Ethics Procedure - Staff .pdf](#)
- [Research Ethics Procedure - Reviewers .pdf](#)
- [Participant Information and Consent Form Template – online \(e.g. surveys\)](#)
- [Participant Information and Consent Form Template – in person \(e.g. interviews\)](#)
- [FRE1 Human Ethics Form](#)
- [FRE2 Human Ethics Form](#)
- [FRE2 Animal Ethics Form](#)
- [Data Protection Impact Assessment](#)
- [Equality Impact Assessment](#)

Appendix One: Research Ethics Approval and Review Flowchart



