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# Research Ethics Policy and Procedure



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	IDEA College	<p>*New College logo was changed on 24/06/2024</p> <p>*Term 'Academy' changed to 'College' on 04/07/2024</p>			

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## 1. Introduction

1.1 IDEA College advocates and encourages discovery and creation of new knowledge through research for the benefit of the wider community and for the good of society.

1.2 IDEA College recognises its responsibility to researchers and the wider community to ensure that the highest standards of integrity and professionalism are observed in the conduct of research.

1.3 Thus IDEA College is committed to:

- a) Ensure that all research is conducted with integrity and ethical practices;
- b) Seeing that all research involving human and animal subjects, and human personal data is governed by respect.
- c) Ensure that its research reflects accountability and high standards of scientific and professional integrity that allow trust in the process of conduction namely, in the methodologies, methods, sampling, analysis, findings, interpretations and dissemination.
- d) Evaluate the impact research might have, not only on directly involved humans and institutions, but also on community sites of cultural, historical or religious significance.

## 2. Aim

This document aims to:

- a) Establish a commitment to high quality research based upon robust standards of research practices throughout the College.
- b) Provide guidance and support to students, researchers, faculty members, administrative staff, and other stakeholders to ensure that good standard ethical practices are followed and maintained throughout the research process.
- c) Minimise the risks of malpractices on the College, individual students/researchers, human and/or animals and other entities.

*To support this document reference to related policies will be made. The final two (2) digits in a Document Code refer to year of development/review. In cases where a more recent review than the one indicated in this document exists, the reader is to refer to the most recent version.*

## 3. Scope

This policy and procedure covers the following:

1. All Undergraduate and Postgraduate Student research;
2. All Doctoral and Professional Research; and
3. All research undertaken by IDEA College staff.

## 4. Definitions

<b>Benefits</b>	A valued or desired outcome to the study that will be an advantage to the human subjects. Compensation is not considered a benefit.
<b>Committees</b>	This term refers to the 3 Committees branching from the Dissertations, Theses and Research Board.
<b>Confidential</b>	Subjects' names are not revealed and are only known to the researcher and are usually coded to a master list and/or kept separately from the data and results.
<b>Cooling off Period</b>	The period when a participant who has given an informed consent to participate, may request to withdraw him/herself from participating and/or withdraw his/her data from being used in the research study without penalty.
<b>Data</b>	Facts and statistics collected together for reference or analysis.
<b>Deception</b>	Statements that might inter alia mislead, falsify, hiding or distorting the truth.
<b>Dissertation</b>	Term used for the research work at Undergraduate and Masters level as part of a study programme.
<b>Dissertation/Thesis and Professional Research Proposal Forms</b>	The Forms used to document the research proposal being submitted by the student/researcher for research work. These forms include the Ethical Considerations.
<b>Fabrication</b>	Making up data or results
<b>Falsification</b>	Manipulating research materials, equipment or processes, or changing or omitting data or results such that the research is not accurately represented in the research record.
<b>IDEA College Research Ethics Board</b>	IREB is the appointed board whose responsibility is to review, non/approve all research proposals before the start of any research carried out by students/researchers at IDEA College. IREB also provides advice and recommendations on ethical matters relating to research work carried out by students and researchers at IDEA College before and during the research process .
<b>Informed Consent</b>	A person's voluntary agreement, based upon adequate knowledge and understanding of relevant information.
<b>Participant</b>	The individual who consented to take part in the research study.
<b>Plagiarism</b>	The appropriation of another person's ideas, processes, results or words without giving appropriate credit.
<b>Research</b>	The systematic investigation and study of materials and sources in order to establish facts and reach new conclusions.
<b>Research Misconduct</b>	Refers to the fabrication, falsification or plagiarism in proposing, performing, or reviewing research, or in reporting research results. Research Misconduct does not include honest errors or differences in opinion.

<b>Special Categories of Data</b>	Processing of personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person’s sex life or sexual orientation shall be prohibited as per Article 9 of GDPR.
<b>Student/Researcher</b>	The person responsible for the preparation, conduct and administration of a research project. In the case of student projects / thesis / dissertation, the researcher is the student, duly guided by an academic supervisor.
<b>Thesis</b>	Term used for the research work of a study programme at Doctoral level.
<b>Voluntary</b>	Free of coercion, duress, or undue inducement. Used in the research context to refer to a subject’s decision to participate (or to continue to participate) in a research activity.

## 5. Acronyms

<b>DTRB</b>	Dissertations, Theses and Research Board
<b>FRP</b>	Final Research Proposal
<b>IREB</b>	IDEA College Research Ethics Board
<b>PRP</b>	Preliminary Research Proposal
<b>REAAF</b>	Research Ethics Application Approval Form

## 6. General Principles of Conducting Research

6.1 All research conducted by IDEA College students/researchers requires ethical approval and clearance from the IDEA College Research Ethics Board.

6.2 Under no circumstance is the research process to commence prior to formal approval being officially given.

6.3 All research carried out at IDEA College shall strictly adhere to the following principles:

1. Conform with all legal and ethical requirements in Malta and/or any other country where research is conducted or where the participants are from;
2. Protect and maintain the confidentiality, dignity, rights, and well-being of human and non-human participants.
3. Understand the human moral responsibility towards the human participants, and the implications this adds on to the interpretation of data collected.
4. Understanding that unethical behaviour and misconduct result in harm, hence researchers are to adhere to the 'Do Not Harm' Principle, minimising and clearly stating any risks involved to any of the stakeholders in the research, be that inter alia, physical, emotional, mental, financial, or reputational, that might come about as a result of their participation.
5. Understand and respect every individual's right to privacy and personal data protection;
6. Obtain informed consent from participants prior to the commencement of the research;
7. Adhere to the research objectives when collecting data, avoiding unnecessary data collection therefore respecting the principle of proportionality;
8. Conduct research by creating honest and transparent dialogue with the public.
9. When human participation is part of the research work, researchers shall obtain their consent prior to the collection/processing of data. Refer to Section 7 below.

6.4 Research Integrity and Academic Misconduct

a) IDEA College views academic misconduct to include all forms of unethical practices which compromise the integrity and honesty of the academic research work. This resulting in harming the participants, the College, the College community in the wider sense and community as a whole.

b) Examples of academic misconduct include but are not limited to:

- Plagiarism;
- Self-plagiarism;
- Collusion;
- Falsification and/or fabrication of research data;
- Theft of people's ideas, documents;



- c) Submitting research work which was purchased from others who conducted the work;
- d) Academics who put their name on work done by their students or juniors.
  
- e) IDEA College supports the student during his/her research work in facilitating his/her research journey avoiding academic misconduct. However, reported cases of academic misconduct are taken seriously by IDEA College.

Refer to

Doc\_017\_22 Recognising and Avoiding Plagiarism Policy and Procedure

Doc\_029\_22 Code of Academic Integrity

Doc\_039\_22 Code of Ethics

## 7. Basic Research Guidelines Involving Human Participants

### 7.1 Identifying human participants

- a) Identification of human participants is done prior to data collection stage.
- b) Participants are identified as a random sample, or through an identified gatekeeper if no specific criteria are guiding the data required.
- c) When established criteria are stipulated for the required data :
  - Participants are identified against a set of stipulated criteria through purposive sampling.
  - Potential subjects are contacted and screened.
- d) The College shall ensure a robust justification in case that identified participants lack social power e.g. children, prisoners, vulnerable persons, by making sure that the gatekeepers e.g. parents, relatives, employers:
  - are fully consulted and understand the involvement process before consenting; and
  - understand that they are acting in the best interests of the potential participants.

### 7.2 Obtaining Consent from Research Participants

#### 7.2.1 Defining human participation

Human participation and involvement in research work includes, but is not limited to:

- Participation in interviews, surveys and/or focus groups;
- Observation of participant(s) by the researcher;
- Researchers accessing any personal documents, data or other materials.

#### 7.2.2 Signing the Consent

- a) It is imperative that all research involving the collection of data, personal or otherwise (any data that relates to an identified or identifiable person or entity) has the consent of each individual participant/entity prior to the collection of data.
- b) The consent shall be specific providing the participants full information about what participation involves. This information shall include an honest and clear explanation about how confidentiality and anonymity shall be safeguarded.
- c) Consent can be obtained by providing each participant/entity with an information letter accompanied by a written consent form. A template for information letters and consent forms will be provided by IDEA College. Refer to the Research Proposal Form that is relevant to the research work being conducted.
- d) A signed copy of the consent form needs to be collected from each participant prior to the collection of data. Adequate time needs to be given to the participants to read the consent form before signing.

### **7.3 Privacy and Data Protection and Management**

- 7.3.1** Each participant's privacy shall be respected in accordance with the General Data Protection Regulation (GDPR) and the Malta Data Protection Act 2018.
- 7.3.2** The data collected shall not be in excess to what is needed.
- 7.3.3** Data collected shall be retained for a period of two years after the completion of the study. Research participants must be informed of this time frame in both the information letter and consent form. In cases of longitudinal studies undertaken by professional researchers a special request may be filed to the IREB and DTRB to retain the information for a longer period of time. Same data protection measures will be in force.
- 7.3.4** All measures shall be taken to keep the data safe and anonymous, including but not limited to storage, access, and dissemination to ensure confidentiality.

### **7.4 Right of Withdrawal from Research Study without a penalty**

- 7.4.1** All research participants have the right to withdraw from the study at any point within the cooling off period (up to 2 months prior to submission date) without explanation, without a penalty, and without suffering any consequences.
- 7.4.2** If the participant is not informed prior to his/her consent that this can only be done within the stipulated cooling off period, then the participant is free to withdraw at any point without explanation, without a penalty, and without suffering any consequences. If this is the case, the data already collected from/about the participant, must be destroyed and cannot be used in any form in the study.

### **7.5 Support to human participants during the conduct of the research**

- 7.5.1** Measures shall be in place to deal with any problems arising during the conduct of the research.
- 7.5.2** Problems could be of emotional distress, abuse and other issues which may impact the participant negatively.
- 7.5.3** In case of problems arising, participants shall be guided as to whom and how to contact, identified support.

## 8. IDEA College Research Ethics Board (IREB)

### 8.1 IREB Structure

- IREB is appointed by the Principal and is made up of the Chair and 2-3 board members.
- IREB is a fully autonomous board. All decisions made by IREB are final.
- IREB members are selected on the basis of their research expertise and experience in relation to the dissertation/theses ethics. At least one member of IREB must have the necessary qualifications, experience, and skills in the area of the protection of personal data as per GDPR, when it comes to special categories of data.
- The first member acts as the chairperson of the Board, the second person acts as the secretary to the Board, other members contribute and support to take decisions regarding the Research Ethics. Other members may be invited to join IREB depending on the need.
- All Board members should be at least in possession of an MQF Level 7 qualification and have adequate experience in applying research methods and carrying research work.
- The Board secretary is mainly responsible for the coordination of meetings, preparation of the agenda, the collection of all the documents required for meetings, keeping the minutes of meetings, and keeping records of all documentation.

### 8.2 Terms of Reference for the IREB

- a) The main objective of IREB is to maintain high ethical standards in the conduct of research at IDEA College, promoting and maintaining excellence in the disciplinary field of academic research.
- b) The Principal appoints IREB members for an automatically renewable definite period. The Principal may terminate an appointment and replace members in cases of inappropriate management.
- c) IREB may request the Principal to invite persons who have expertise in specific disciplinary fields to participate and advise the board during the meetings.
- d) IREB is responsible for:
  - i. Carrying out the ethical review of all research ethics proposals and to give non-approval to the students/researchers. In the case of non-approvals IREB will make recommendations for the necessary changes;
  - ii. Supporting QA in the regular reviewing of this policy and procedure according to the Internal Audit Plan.
  - iii. Carrying out the final review of all re-submitted research ethics proposals which required amendments.
- e) Providing advice and recommendations on ethical matters relating to research work carried out by students and researchers at IDEA College before and during the research process.
- f) In carrying out its duties, IREB will ensure that the principles of its policy and procedures as defined by this document are observed.
- g) Student/Researchers communicate with the Ethics Board via DTRB.

## 9. Criteria for Ethical Review of the Research Proposal by IREB

9.1 All research proposals are to go through IREB. Under no circumstance is the research process to commence prior to formal approval being officially given. Refer to Section 6.

9.2 IREB needs to review any of the following:

1. Research studies that may jeopardise the health or well-being of the participants/ institution be it reputational, material, physiological or psychological.
2. Research studies that involve surveys or questionnaires or any other form of data collection method which participants may interpret as highly personal or offensive (referred to as special categories of data). Special categories of data include data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.
3. Research studies which include vulnerable groups, which refer to any individual or group of individuals considered particularly susceptible to coercion or undue influence in a research setting. A vulnerable group includes persons who may be incapable of understanding what it means to participate in research and/or who may not understand what constitutes informed consent. Individuals considered vulnerable may, for various reasons, have a diminished capacity to anticipate, cope with, resist, and/or recover from the impact of a natural or man-made hazard. Vulnerable groups may also consist of individuals who are unable to care for themselves and/or may have an increased chance of suicide, self-harm, or the likelihood of harming self-and/or others.
4. Research studies involving prisoners or young offenders.
5. Research studies where personal data can lead to the identification of individuals hence breaching GDPR e.g., research studies which intend to use sources that may lead to a participant's identity being revealed such as video/audio recordings, photographs, and quotations, if the data will be available beyond the research team.
6. Research studies where there is a risk of breaching confidentiality.
7. Research studies which involve any form of deception.
8. Research studies where the researcher's safety may be at risk.
9. Research studies that may be detrimental to the natural or built environment.
10. Research studies that may be detrimental to the reputational and/or financial well-being of an individual or organisation.
11. Research studies that may be detrimental to the well-being of animals.
12. Research studies where the researcher may have any ethical concerns.

## 10. Research Ethics Review Procedure

10.1 Once the Final Research Proposal has been approved by the respective Committee, the student sends the REAAF for review by the IDEA College Research Ethics Board (IREB).

10.2 The IREB meets to review all REAAs.

10.3 IREB will review all Research Ethics Application Approval Forms (REAAFs) and issue approval/conditional approval/non-approval accordingly, in writing by filling in the relevant section on the REAAF and forwards to the DTRB.

10.4 The DTRB communicates with the student / researcher about the outcome by the IREB:

10.4.1 If approved, the student / researcher can start carrying out their research study, unless clearance from third parties is required. Refer to section 10.5 below.

10.4.2 If the REAAF is conditionally approved for ethical purposes, IREB will make recommendations to the student/researcher and ask for amendments.

10.4.2.1 The student needs to follow recommendations in accordance with their supervisor.

10.4.3 If the REAAF is not approved the student is informed about the decision of the IREB and the DTRB.

10.4.3.1 The student needs to resubmit to DTRB.

10.5 REAAFs involving third parties e.g., Health Care under the Ministry of Health need to be also officially approved by the third party's Ethics Committee before any research can take place.

## 11. Researcher's Responsibilities

Together with all the clauses outlined in the previous sections of this documents, the student / researcher is also responsible for the following:

### 11.1 General

- a) The student / researcher is responsible to ensure that all the processes and phases of the research work (to include but not limited to the proposal stage, research design, methodologies/methods, collection of data, interpretation and analysis and dissemination), carried out at IDEA College are conducted ethically and responsibly towards human subjects, animals, and environmental protection.
- b) The student / researcher shall forward his/her application on IDEA College's Research Ethics Application Approval Form, to the DTRB.
- c) The collection of data and involvement of human subjects in research can only start to be carried out upon approval of IREB, and clearance from third parties when required, and the collection of the informed consent of participants/entities as stipulated by policy and procedure.

### 11.2 Consent

- a) All participants in the research must choose to do so out of their own free will.
- b) Written consent must be given by signing a detailed consent form that clearly covers what their participation entails, including any benefits and risks, how the participant will be protected, and data collected will be used and discarded once used.
- c) Templates of consent forms are provided by IDEA College.
- d) The consent forms can be amended in special circumstances to adapt to the needs of the researcher.
- e) Consent forms need to be signed by both the researcher and the participant and a copy needs to be given to each participant.
- f) Consent forms need to be provided in English and Maltese (when required).
- g) In some cases, institutional approval for access to participants will also be required. The student is to refer to the entity concerned to be guided accordingly.

### 11.3 Covert Research

If a student chooses to conduct any form of covert research, a detailed justification must be given to IREB to why this is necessary for the study. IREB will approve such studies **only** when no other reasonable alternative is possible.

### 11.4 Confidentiality

- a) All Gathering of Data Protection Regulations (GDPR Privacy Policy on IDEA College website: <https://mt.ideaeducation.com/documentation/> ) must be adhered to.
- b) An Information Letter Template is also available to all IDEA College students. This letter includes the aim and purpose of the study being conducted, the details of the researcher, ethical

consideration related to the protection of confidentiality of the participants, the duration of the study, and the disposal of recorded/collected data once the study has been completed.

- c) All data collected, including personal details and consent forms shall be stored safely and securely.

### **11.5 Withdrawal from Research Study**

- a) Research participants can withdraw from the study at any point without suffering any negative consequences. The process of how they can withdraw needs to be explained before giving consent. A clause to safeguard the student / researcher, indicating a cooling off period that allows for withdrawal may be included. In such cases this needs to be made clear to the participants.
- b) Participants also have the right to withdraw their data after it has been collected. The procedure of how this can be done must be explained clearly prior to consent being given. If a cooling off period clause is in place, this does not apply if that period has surpassed. Participants must also be informed that their data will be destroyed immediately upon their withdrawal from the research study.

### **11.6 Disclosure**

If unethical behaviour or practices are uncovered or observed during the research study which may lead to any form of harm to the participant or others, participants must be aware that confidentiality may have to be broken as relevant authorities will be informed.

### **11.7 Animal Rights and Environmental Protection**

The suffering of any animal must be avoided, as must any negative impact on the natural or built environment. All legislations related to animal welfare and environmental protection must be adhered to at all times.

### **11.8 Dissemination**

IDEA College may choose to share any research study with the general public for the benefit of fellow professionals, policy makers and general public knowledge. This must be done following all ethical guidelines aforementioned.



## 12. Supporting Documents

- Doc\_013\_22 IDEA College Ethos
  - Doc\_039\_22 Code of Ethics
  - Doc\_038\_22 IDEA Academy Boards
  - Doc\_127\_23 Board and Committees for Dissertations, Theses and Research – Policy and Procedure
- 
- FRM\_063\_23 Dissertation Research Proposal Form
  - FRM\_132\_23 Project-Based Dissertation Research Proposal Form
  - FRM\_139\_24 IDEA Academy Research Ethics Application Approval Form
  - FRM\_146\_23 Request for Amendment of an approved Research Project Form

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