Global Banking School
891 Greenford Road, London
UB6 0HE
+44 (0) 207 539 3548
info@globalbanking.ac.uk
www.globalbanking.ac.uk

GBS Code of Practice for the Ethical Conduct of Research

Document title	GBS Code of Practice for the Ethical Conduct of Research
Version	V1.0
Approved by (Oversight Committee)	Research, Scholarly and Professional Practice Committee
Policy lead (Staff member accountable)	Provost
Date of original approval	December 2023
Date of last review	N/A
Changes made at the last review:	N/A
Date effective from	January 2024
Date of next review	January 2027

Related GBS policies
• GBS Research Governance and Integrity Policy
External Reference Points
NA

Table of Contents

GBS Code of Practice for the Ethical Conduct of Research

1. Introduction

1.1. Global Banking School (GBS) expects that all research undertaken by its staff, or otherwise on its behalf, is carried out with the highest integrity, and to the highest ethical standards.

1.2. All research carried out at, or on behalf of GBS, whether by its own staff or not, must be granted ethics approval from the University before commencement of any data collection.

1.3. Matters of research ethics will be considered by the Research Ethics Committee (REC), a sub-committee of the Research, Scholarly and Professional Practice Committee (RSPPC). The membership and terms of reference of the REC can be found in Appendix 1.

1.4. Except for undergraduate and taught masters research projects, which may normally be evaluated at departmental level (see clause 1.4 for exceptions), all research must be evaluated by the Research Ethics Committee.

1.5. Each faculty shall establish a Faculty Research Ethics Group (FREG), of suitably qualified and experienced individuals who shall review and, as appropriate, approve undergraduate and taught masters research projects.

1.6. If the Faculty Research Ethics Group considers and undergraduate or taught Master's projects to be sensitive or have the potential to damage or bring GBS or any company or individual within GEDU into disrepute or conflict with third parties, they shall be referred to the REIC for further consideration.

1.7. Ultimately, it is the responsibility of each individual researcher to ensure that their research is carried out ethically. This Code of Practice is intended to provide guidance to staff, and to help GBS to assure itself that all research carried out by its staff, or on its behalf, adheres to the highest ethical standards. No code of practice can cover all possible ethical issues that may arise in the conduct of any research; researchers should be aware that while this set of principles will assist them in

considering the ethical dilemmas that may arise, managing such dilemmas is an on-going process that requires attention throughout the course of a project.

2. General Principles

2.1. The integrity of any research depends not only on its intellectual rigour but also on its ethical adequacy. The following general principles are applicable across all areas of research activity. Further principles relating to the ethical conduct of research involving human and non-human animal subjects are detailed in parts 2 and 3, respectively.

2.2. **Non-falsification of data:**

Researchers have an ethical obligation to assure the integrity of their data. Thus, questionnaire responses, experimental observation and data analyses should not be fabricated, altered, discarded or in any other way deliberately manipulated in such a way as to distort the results or to manufacture any particular outcomes. In addition, researchers have a responsibility to exercise reasonable care in processing data to ensure no errors are introduced that may affect the results.

2.3. **Dissemination of research findings**

Researchers have a duty to disseminate research findings to all appropriate parties. Researchers are obliged to give full and proper attribution of ideas: presenting the words, data or ideas of another person as your own without properly citing them is plagiarism. This is not only misconduct but can also be an infringement of copyright, amounting to theft of intellectual property.

If the research involves human subjects, researchers should offer all participants and other relevant stakeholders access to a summary of the research findings. Reports to the public should be clear and understandable and accurately reflect the significance of the study.

2.4. **Ethics and research design:**

Researchers should be open to a wide range of research methods: failure to consider and evaluated alternative methods and tools for the collection of data may be regarded as overtly biased.

Appropriate steps should be taken to ensure that no samples are obtained from unethical sources: *(inter alia)* illegal databases; unregistered suppliers of samples. Research based on existing data that was obtained unethically may itself be considered unethical.

2.5. **Authorship credit:**

Only those researchers who are significant contributors to a research project should be given authorship credit. A *significant contributor* might be described as a person playing a major role in conceptualising, analysing or writing the final document. Ideally, all those involved in the research project should agree the order of authorship; often, the first author is the one who has made the biggest contribution.

2.6. **Conflict of interest:**

Researchers should be aware of the potential influence of personal or commercial interests on their work and take all practical measures to ensure that information is presented without distortion.

2.7. **The principle of beneficence:**

Researchers are required to protect individuals by seeking to maximise anticipated benefits and minimise possible harms. It is therefore necessary to carefully examine the design of the study and its risks and benefits including, in some cases, identifying alternative ways of obtaining the benefits sought from the research. Research risks must always be justified by the potential benefits of the research.

2.8. **Legal and professional codes of conduct:**

Researchers should undertake research legally and in accordance with any relevant statutory and professional codes of conduct.

2.9. **Personal information:**

Researchers should anonymise information which relates to individuals when they have not obtained informed consent, unless there is a clear justification to the contrary.

Researchers should be aware of the impact of dissemination of their work, including that on any individual or group of individuals. If it is anticipated that it might cause distress, it is essential to demonstrate that the benefits outweigh this risk.

2.10. **Storage and Disposal of Data:**

Researchers must make sure that data management is built into their planning. At the same time as ensuring that personal and other confidential data is kept secure, researchers have an obligation, so far as is possible, to make the data upon which their research outputs are based, available to other researchers in the future. Meeting both objectives requires careful planning.

Data must at all times be maintained or destroyed in accordance with existing data protection laws and best practice.

3. Research Involving Human Subjects

3.1. Research involving human subjects is undertaken by **many different disciplines** and conducted in a broad range of settings and institutions. Whilst some issues are specific to particular professional groups, all research should be guided by a set of fundamental ethical principles to ensure the protection of human subjects. The standards outlined in the paragraphs below have been developed to guide staff and students at GBS who undertake research that actively involves human subjects.

3.2. Research relationships are frequently characterised by disparities of power and status. Despite this, research relationships should be characterised, wherever possible, by trust, honesty and integrity.

3.3. Researchers should avoid deceiving participants **wherever possible**. Only in certain **exceptional** circumstances is deception a necessary methodological feature of research. In such cases, the reasons should always be explained to participants at the conclusion of the study.

3.4 **Non-maleficence and beneficence:**

Underpinning GBS's expectations of the ethical standards for the conduct of research is the philosophy: **do no harm** (non-maleficence); and, whenever possible, **do good** (beneficence).

The risks of undertaking the research must always be weighed against its (potential) benefits. The risks involved are not always clear cut; for example, questionnaires,

observation and interviews *can* be potentially intrusive and provoke anxiety in participants or, worse, involve psychological risk.

Certain groups, such as children and vulnerable adults, are particularly susceptible to negative impact. Other participants may be unable to give informed consent and are therefore less able to protect themselves, for example people with dementia. Researchers need to judge whether a particular intervention is likely to affect the wellbeing of participants. They should identify any potential risks to participants that might arise during the course of the research.

Researchers must be able to justify her/his procedures, explaining why alternative approaches involving less risk cannot be used. The potential benefits of the research to participants, the scientific community and/or society must be clearly stated.

Any cultural, religious, gender or other differences in research population should be handled sensitively and appropriately throughout the course of the research. Researchers also face a range of potential risks to their own safety. Researchers need to consider safety issues in the design and conduct of research projects and adopt procedures to reduce the risk to them.

3.5. **Informed Consent:**

Researchers should normally obtain voluntary informed consent, in writing, from any participant who is able to give such consent.

Researchers must therefore ensure that participants understand the purpose and nature of the study, what participant in the study entails, and what benefits are intended to result from the study.

Researchers should normally provide participants with clearly communicated information in advance**.** The researcher should explain her/his procedures on an information sheet, written in language and style appropriate to potential research participants. The information sheet should set out: the purpose of the investigation; the procedures; the risks; the benefits, if any, to the individual or to others; a statement that individuals may decline to participate and are free to withdraw at any time without giving a reason; an invitation to ask further questions; and information about how the research data will be stored and used (now and in the

future). Participants should be given plenty of time to study the information sheet and consult other relevant parties, should they so wish.

Researchers have responsibility for seeking on-going consent during the study, where relevant. Participants must be free to withdraw from the study at any time. If participants appear uncomfortable, the researcher should respond sensitively and re-iterate the right of participants to withdraw if they so wish.

Individual consent may be unnecessary for those research activities that are not intrusive, for example studies involving observation of public behaviour.

3.6. **Free from coercion or other pressure to participate**

No participant should ever be put under pressure or otherwise coerced, including the giving of inducements, to participate.

Whilst compensation for damage, injury or loss of income may be appropriate, inducements such as special services, financial payments, or other inappropriate forms of motivation should be avoided. Reimbursement of participants' expenses, for example for travel, is not payment in the sense of reward and can be provided. It is also reasonable to provide participants with a small gratuity to cover their time but this should be done cautiously and with consideration in order to avoid setting up a culture of expectation.

The risks involved in participation should be acceptable to participants, even in the absence of inducement. Normally participants should not be exposed to risks greater than or additional to those encountered in their normal lifestyles.

3.7 **Third party consent**

When third parties, for example parents, teachers or health care professionals, are directly involved in the care, education or treatment of potential participants, their informed consent should also be sought. In such cases, informed consent should involve sharing of information about the project.

If the research is likely to interfere with the treatment or care being provided by a third party, it is necessary that they be fully involved and give written consent to participate.

In certain situations, the affiliation of participants to particular organisations or special groups, such as educational institutions or hospitals, may necessitate their granting of permission to conduct the research project. In such cases any relevant policies or guidelines should be followed.

3.7. **Vulnerable participants**

Researchers have a special obligation to seek the consent of vulnerable participants or the assent of their representatives. If the involvement of children in a research study are justified, then parents or other legal guardians must be informed and to give their assent for inclusion of their child in the study. To the extent that it is feasible, which will vary with age, the willing consent of child participants should be sought. Generally, children over age 16 may be assumed to be capable of giving informed consent.

3.8. In some situations, access to a research setting is gained via a 'gatekeeper'. In these situations, the researcher should adhere to the principle of obtaining informed consent directly from research participants to whom access is required, while at the same time taking account of the gatekeeper's interests and the policies that apply in the particular setting.

3.9. Researchers need to take particular care where the research activity involves them in having unsupervised access to children. There may be certain legal pre-requisites (such as criminal records checks) that need to be satisfactorily completed before the research can take place. In such circumstances, the REC will need to be assured that all necessary statutory requirements have been met before ethics approval is given.

3.10. Special care should also be taken where research participants are particularly vulnerable by virtue of factors such as age, disability, or their physical or mental health. The researcher needs to take into account the legal and ethical complexities involved in those circumstances where there are particular difficulties in eliciting fully informed consent. In some situations, proxies may need to be used in order to gather data. Where proxies are used, care should be taken not to intrude on the personal space of the person to whom the data ultimately refer, or to disturb the relationship between this person and the proxy. Where it can be inferred that the person about whom data are sought would object to supplying certain kinds of information, that material should not be sought from the proxy.

3.11. Researchers need to consider carefully the quality of consent of participants in a potentially dependent or pre-existing relationship with him/her (for example, patients, school pupils, students or employees) as willingness to volunteer may be unduly influenced by the expectation of benefits for compliance or fear of repercussions for refusal.

3.12. Be very careful about taking photographs of research subjects. Photographs of children should only be taken when explicit and written consent has been obtained from the parent or legal guardian. The storage of all such photographs must be secure and the parent/legal guardian advised in detail about the storage of any photographs. Researchers are advised not to publish photographs (in hard copy or electronically) with children in them. Subjects in any published photograph must not be identifiable in any way.

4. Confidentiality and anonymity

4.1. Researchers should maintain participants' confidentiality and anonymity. Researchers should not reveal the identity of any participant, nor any information which may lead to the identification of any participant, without obtaining adequate prior consent.

4.2. The researcher and any collaborators should manage all data obtained through the project so as not to compromise the dignity of participants or infringe upon their rights to privacy.

4.3. Guarantees of confidentiality and anonymity given to research participants must be honoured, unless there are clear and over-riding reasons to do otherwise, for example, in relation to the abuse of children. In research with children, researchers should have regard for issues of child protection and make provision for the potential disclosure of abuse. Specialist advice should be sought where relevant.

4.4. When personal identifiers are used in a study, the researcher should explain why this is necessary and how confidentiality will be protected.

4.5. Researchers should follow procedures for protecting the confidentiality of participants, such as:

- Securing statements of commitment to confidentiality from individual research personnel.
- Using pseudonyms to protect the identity of participants.
- Storing data with identifying information in a locked file or password protected/encrypted area on your computer. Access to these files must be restricted to the researcher or (in agreed cases) the designated members of a research team.
- Using codes for identifying participants when transcribing tapes, deleting the tapes on completion of transcription.
- Disposing of information that could reveal participants carefully, for example by shredding or burning or in confidential wastebaskets.

4.6. Researchers should take special care when carrying out research via the Internet. Ethical standards for Internet research are not well developed. Eliciting informed consent, negotiating access agreements, assessing the boundaries between the public and the private, and ensuring the security of data transmissions are all problematic in Internet research. Researchers who carry out research online should ensure they are familiar with ongoing debates on the ethics of Internet research and should be cautious when making judgements affecting the well-being of online research participants.

5. Data protection

5.1. Researchers must comply with all appropriate legal acts and take account of best practice when collecting and storing research data.

5.2. Researchers need to be aware of the risks to anonymity, privacy and confidentiality posed by personal information storage and processing, including computer and paper files, e-mail records, audio and videotapes, or any other information that directly identifies an individual.

5.3. Researchers need to inform participants about what kinds of personal information will be collected, what will be done with it, how long it will be kept before it is destroyed, and to who whom it will be disclosed.

5.4. Researchers must build longer term data management into their project planning. Universities are required to make research data available wherever possible, and

so there must be plans for data archiving, or a justification for destruction where appropriate.

6. Internet mediated research (IMR)

6.1. The REC will be expected to take into account specific guidance on IMR, within the following parameters:

6.2. Standard principles apply to IMR:

a. Respect for the autonomy, privacy and dignity of individuals and communities
b. Scientific integrity
c. Social responsibility
d. Maximizing benefits and minimizing harm.

6.3. IMR has distinctive characteristics. The following should be taken into account:

a. GDPR: proxy consent should not be assumed simply because material is viewed to be in the public domain. Copyright may reside with an author or web host.
b. Accuracy of data may be impacted by the producing organisation- for example, a commercial or political organisation may produce data containing inherent bias.
c. Algorithms and AI used for data collection may have an embedded bias – data is only as good as the parameters and request terms inputted.
d. Metadata such as location, IP address, email address, or timings may present a risk of mosaic identification.
e. GDPR data minimisation rules are at risk where Big Data is utilized.
f. IMR presents a risk of a large impact due to potential audience sizes.
g. The impact of prejudice inherent in the use of images is particularly acute in IMR.

6.4. REC should take the following approach to IMR:

a. GDPR: check that proxy consent is valid or where copyright resides with an author or web host to provide proof of this.
b. Check in the proposal that the fact that accuracy of data may be impacted by the producing organization has been taken into account.
c. Check in the proposal that the fact that algorithms and AI used for data collection may have embedded bias has been taken into account.

d. Ensure that metadata is deleted from datasets or that it is explicitly referred to in the Data Management Plan such that it does not present a risk of mosaic identification.
e. Ensure that GDPR data minimisation rules are adhered to, especially that a reasonably sized dataset for the research aims is used, and no more.
f. Check that the research application recognises and accounts for the risk that IMR could have a large impact due to potential audience size.
g. Address the risk of impact of prejudice inherent in the use of images.
h. Require that research ethics applicants include academic references in their proposal which explicitly justify those decisions and mitigations they have designed in relation to IMR.
i. Take note of the British Psychological Society and Association of Internet Researchers best-practice documents referred to in the references to this guidance, in making decisions, where relevant.

Appendix 1

Research Ethics Committee (REC)
Terms of Reference

1. Membership

1.1. Chair: Dean of Education

1.2. One member from each Faculty Research Ethics Group (FREG).

1.3. Secretary in attendance: Member of ASQO staff appointed by the Director of Academic Standards and Quality.

2. Terms of reference

2.1. To oversee high standards of ethical conduct in GBS's research and knowledge exchange and the upholding of said high standards in student and staff research proposals.

2.2. To develop and review institutional guidelines in consultation with RSPPC and faculties to ensure that appropriate advice is available for staff, supervisors and students on good practice in relation to the ethics of their research.

2.3. To consider and, if appropriate, approve staff research proposals.

2.4. To consider and, if appropriate, approve those student research proposals referred to it by FREGs.

2.5. To consider and, if appropriate, approve amendments to previously approved research proposals.

2.6. To review appeals, complaints and adverse events or incidents reported regarding ethically approved research.

2.7. To report on an annual basis to RSPPC, including a summary of all reviewed projects and a report on the effectiveness of current practice and procedures.

3. Quoracy

3.1. Quoracy is four of seven required attendees: ie at least half of the faculty representatives and the Chair.

4. Frequency of meeting

4.1. The committee is held on a bi-monthly basis, to align with the three student intakes, although Chair's action may be completed where necessary.