

Academic Ethics Review Policy

Owner: *Provost and Deputy Vice-Chancellor*

Approved by: *Research Committee – February 2026*
Academic Committee – March 2026

Next review due date: *March 2028*

Version: *1.7*

Policy reference number *Ethics01*

Policy version tracking

Version Number	Date	Revision Description	Editor	Status
1.1.	April 2016	Initial approval by Senate	DVC	Published
1.2.	May 2019	Review by SRC and approved by Senate	DVC	Published
1.3	November 2022	Research Ethics Policy was revised and re-named the Academic Ethics Review Policy. Approved by Academic Committee Nov 2022	Associate Provost (Research Lead)	Approved
1.4	October / November 2023	Minor revisions made to REP name and appeal section to align with updated processes. Approved by Academic Committee Nov 2023.	Head of Governance	Approved
1.5	October 2024	Addition of Schedule A clarifying applicability of policy to collaborative partners. Approved by Academic Committee October 2024.	Collaborative Provision Manager	Approved
1.6	Feb 2026	Research Ethics Panel made revisions to several sections and moved some wording from its Terms of Reference to this policy (see section 7).	Research Ethics Panel	Approved
1.7	July 2026	Update to information in Section 4 regarding freedom of speech.	Research Ethics Panel	Approved

1. Introduction

The Academic Ethics Review Policy (AERP) provides the framework for the ethical consideration of academic work across the University. This policy refers to staff and students, and to other persons engaged in any University-led academic activity that has ethical considerations, as outlined below, as a condition of their being granted access to the University's premises or facilities, whether the activity is conducted on the University's premises, off-site, or online.

Ethical approval is required prior to commencement of any research, dissertations, projects, content creation, and performances involving data collection, interaction with human participants, or collecting human personal data. Failure to gain ethical approval prior to conducting any project that requires it breaches the terms of the AERP, and may constitute academic misconduct for students or a disciplinary matter for staff.

Reference should also be made to professional ethical expectations where appropriate (e.g., where there is professional body accreditation).

2. Aims

The purpose of the policy is to:

- Foster a culture within the University that embraces the principles set out here, and the obligations contained in relevant legislation, to protect the rights, dignity and welfare of those invited to participate in academic projects or when human personal data is collected;
- Provide ethical guidance that communicates regulatory requirements and best practice, offering ongoing support and training to staff and students to maintain high ethical standards in their academic work;
- Maintain a review process that subjects those activities to a level of scrutiny proportionate to the risk of harm or adverse effect.

Objectives:

- To ensure that all research and other academic activities that involve human participants undertaken at Regent's University London are scrutinised by at least two people to ensure that they comply with agreed ethical standards (in the case of module level approval, one of the approvers should be the Course Leader or the Module Leader);
- To provide academic staff with the experience of the ethical scrutiny of research and academic activities that involve human participation, thereby disseminating knowledge and good practice about ethical issues;
- To appropriately educate and inform students of the ethical dimensions and responsibilities of academic activity;
- To facilitate the efficient and prompt consideration of proposals and relevant activities without sacrificing the rigour of the scrutiny process.

4. Principles and Commitments

Integrity:

Regent's University London is committed to ensuring accuracy, honesty and consistency in its

approach to research.

The University meets this commitment by:

- Addressing any allegations of misconduct in a timely and robust manner;
- Avoidance of any self-interest or conflicts of interest in its research activity and in the ethics approval process;
- Openness and candour in the approach to applications and review.

Rigour:

Regent's University London is committed to ensuring that academic activities involving human participants and personal data are conducted in a way which: respects the dignity, rights, and welfare of all participants; minimizes risk to participants, students, staff, and third parties; appropriately manages personal data; and maximizes the public benefit of the activity.

The University meets this commitment by:

- Requiring that projects and learning activities are designed and undertaken under qualified supervision in a manner that evinces a commitment to accountability and quality;
- Setting appropriate standards for the conduct of activities involving human participants and personal data that are in line with current legislation and best practice;
- Identifying and reviewing all academic activities involving human participants and personal data in proportion to the level of risk, irrespective of whether the ethical standards of that activity are additionally secured by another recognized approval procedure, for example that of the National Health Service;
- Ensuring that relevant academic activities comply with current legislative requirements such as those on data protection. Further information is set out in our Data Protection Policy (available at privacy@regents.ac.uk).
- Ensuring that the dissemination of research and other academic outputs is accurate and appropriate.

Respect:

The University is committed to ensuring that all research and academic activities involving human participants and personal data contribute to the public good, and that the dignity, rights, and welfare of those conducting the project, participants and third parties (which may include family members, carers, colleagues, or the wider community) are respected.

The University meets this commitment by:

- Avoiding harm to people involved in or affected by research projects or any academic activity involving human participants through the early identification and considered assessment of risk;
- Requiring that participants be fully informed about the purpose and intended uses of the research or project, what their participation involves, and details of any risks, ensuring that consent to participate is informed, valid and freely given prior to the commencement

of the project; this will normally be through a participant information sheet and signed consent form;

- Respecting the participant's right to withdraw at any time without adverse consequences; observing the confidentiality of information provided by participants and, where appropriate, respecting their anonymity;
- Following correct procedures of disclosure to the relevant authorities when working with vulnerable groups such as children or vulnerable adults.

Responsibility:

The University is committed to providing leadership in ethical conduct of research and to participating openly in discussions on the direction of research and improvements to practice in this area.

The University meets this commitment by:

- Contributing, listening, and responding to public debate that concerns the ethical consideration of academic projects involving human participants and personal data;
- Working closely with relevant peer groups and government agencies to remain abreast of developments and informed of UK (United Kingdom) policy;
- Maintaining open and transparent procedures relating to the conduct and review of academic activities.

Education, training, and personal development:

The University is committed to sustaining and encouraging the ethical conduct of academic work among members of the University. This is achieved by the provision of training to equip them with the skills to recognise potential risks and by raising awareness of the University's policy, procedures, and responsibilities, thus ensuring the University meets its obligations under the relevant legislation.

The University meets this commitment by:

- Communicating the University's policy effectively;
- Promoting awareness of best practice through education and training;
- Promoting awareness of the researcher's own and others' competencies and the necessary limits to activities;
- Providing appropriate training for both those undertaking academic activities involving human participants and personal data, and for those responsible for ethical review so that knowledge and skills are up to date;
- Fostering an environment of openness and integrity that encourages collaboration and early communication of potential risks.

Tutors, Supervisors, Module Leaders and Course Leaders must ensure that ethical training and instruction in the use of the Ethical Approval Portal (hereafter EAP) is embedded in all modules that engage with human participants. Course Leaders should ensure that a link to the EAP is provided via Blackboard for all relevant courses/modules under their supervision. Directors of Programmes

have overall responsibility to ensure that the courses within their programmes are compliant with the expectations of this policy and that the ethics application process is followed.

Course Leaders and Directors of Programmes must use oversight to ensure all students are made aware of and can use the EAP as part of the curriculum where there is engagement with human participants. Under no circumstances should a module where there is human engagement be exempt from the EAP process.

Freedom of Speech and Academic Freedom

The University is committed to promoting the importance of freedom of speech within the law and to promoting academic freedom in the provision of higher education. Accordingly, the University has approved a Free Speech Code of Practice which incorporates its values concerning freedom of speech and academic freedom and sets out how it will manage its activities and events to uphold those values, as far as reasonably practicable. The Code confirms the University's legal obligations to take steps to secure freedom of speech within the law for its students, staff, members (including its Directors) and visiting speakers. The Code also includes procedures to follow in relation to speakers, events and other relevant activities. A definitive and up-to-date statement of the University's approach to freedom of speech is set out in this Code, which can be found on its website: <https://www.regents.ac.uk/about/corporate-governance>

The University recognises that its staff and students are free to undertake academic research within the law. This freedom will not be restricted in any way because of a perceived or actual tension between any conclusions that the research has reached and the University's values, or the values of external organisations.

In relation to research ethics, the University meets its freedom of speech commitments by:

- Ensuring that ethical reviews are focused on ethical issues and do not impose any requirements which might restrict lawful freedom of speech or expression;
- Ensuring that the Research Ethics Panel has particular regard to the importance of academic freedom and to the risks to academic freedom of any decision;
- Ensuring that the ethical review process is transparent;
- Monitoring the appeals process for any evidence of unnecessary suppression of research.

5. Criteria covered by review at each stage

Following the principles and commitments in section 4, reviewers will be scrutinising proposals, as set out in the ethics form, in respect of:

- Aims of project/benefits to participants/society
- Appropriate design and method
- Recruitment and participant selection
- Informed consent
- Participation of vulnerable groups (if any)
- Data collection process
- Data analysis
- Risk analysis undertaken (to applicant, participants or any third parties)

- Data protection and secure storage
- Dissemination.
- Any alterations to previously approved proposals (i.e. where circumstances have changed, the researcher(s) will be required to gain approval for any amendments to their research plans)

6. Ethical review and approval process

The formal procedure for application for ethical approval is set out on the University's Website.

Applicants (other than doctoral students – see below) must use the University's online Ethical Approval Portal to seek ethical approval.

Applications through EAP are compulsory for all projects and assignments that involve human participants (defined but not limited to interviewees, performers, clients, etc.)

Academic Staff Research

- All applications are made directly via EAP and reviewed by the University's Research Ethics Panel (REP).

Doctoral research students

- Research proposals will be submitted through the processes established with our validating partners.

Students following Undergraduate and taught Postgraduate programmes

For Major Projects, dissertations, final projects, or equivalent, students should be suitably supported within the module to submit applications via EAP whether involving human interaction or not, and before any human interaction commences within the project:

- Applications are reviewed by the student's supervisor/tutor and at that stage they may provide feedback and require changes before advancing the application;
- Once the supervisor/tutor is satisfied that the submission meets appropriate ethical standards, the application is reviewed by the Module Leader who will determine 'low risk' or 'high risk';*
- Low risk applications, if complete, are deemed approved at this stage and the student notified;
- High risk applications are referred for further consideration by the University Research Ethics Panel*;
- Course Leaders are automatically notified of progress at each stage and will monitor the process for their programme.

**See appendix 1 for examples of high-risk scenarios.*

For projects in other modules that involve human participants (e.g., interviewees, performers, clients) an application must be made by the individual student as directed by the tutor before human interaction commences on the project. The process is then as above.

For assignments on any module that requires student interaction with human participants or their personal data, before the commencement of the module:

- The module leader must submit the assignment brief through the online portal;
- This will then be reviewed by the Course Leader who will determine 'low risk' or 'high risk';
- Low risk applications, if complete, are deemed approved at this stage and the Module Leader notified;
- High risk applications (see Appendix 1) are referred for consideration by the University Research Ethics Panel;
- For assignment briefs set in module specifications at validation, ethical approval can be sought for the entire period granted at validation;
- For those which vary year-to-year, ethical approval will need to be sought by the module leader before the commencement of teaching each academic year.

7. Referrals to the Research Ethics Panel

Where requested by the approving academic on behalf of a student or group of students, or when considering a proposal for staff research, the Panel will assess the ethical issues raised by the proposals and will grant, refer back or withhold approval from such projects; specifying, where necessary, any conditions subject to which the proposals may be allowed. The Panel may:

- a) Confirm approval of a proposal
- b) Request further information on a proposal.
- c) Withhold approval, where the panel has serious concerns about the ethics of a proposal.

The REP will scrutinise research proposals in respect of the criteria set out at section 5 above.

The REP reserves the right to revoke, reject, or defer approval that has previously been granted if not satisfied that the conduct of the research is consistent with good ethical practice as set out in the Academic Ethics Review Policy and Ethical Guidelines. Under such circumstances, the Panel must provide their reasons for deferment, rejection or revocation, and applicants may appeal the decision of the REP.

As set out in its Standing Orders, for routine referrals, the Chair of the REP, plus one other Panel member (as allocated by the Chair) may review and determine the outcome of an application on behalf of the Panel. The Chair may also invite a specialist reviewer (with expertise in the research subject area) to provide advice, where required. For any applications where a decision cannot be reached at the initial Chair-led review stage, or where the application is seen to be of particularly high risk, the application will be referred to all Panel members for collective review and decision.

8. Appeals

Applicants may appeal an ethics review decision to withhold, suspend or withdraw ethical approval of a project/assessment by contacting the Chair of the Research Committee, who will then arrange an appeal panel. If the decision being appealed was *not* initially taken by the Research Ethics Panel, then the Panel may consider and determine the appeal. If the decision being appealed was a decision made by the Research Ethics Panel, then the Research Committee Chair will appoint

an independent appeal panel, formed of three members of academic staff who have experience in determining ethical applications and who have not been involved in the decision that is being appealed. In all cases, the proposer will also be invited to the appeal, but it will go ahead whether they attend or not. Appeals must be lodged within ten working days of communication of the outcome. The decision taken by the appeal panel (whether this be the Research Ethics Panel or another independent panel) is final.

9. Review of the Policy

The Research Committee will keep under regular review all policies and procedures relating to the ethical conduct of research involving human participants and personal data. A report on the outcomes of the research ethics process will be provided to the last Research Committee of each academic year by the Chair of Research Ethics Panel.

The applicability of this Policy under the University's Collaborative Provision arrangements is detailed in Schedule A.

APPENDIX 1

Guidance for students and staff in determining high risk in the research ethics process.

High Risk applications are those that have the potential of negative impacts on participants and society. You must consider if the following areas of high risk are relevant and discuss these with your course leader / module leader / supervisor during your research design. This is so that steps can be taken to allow you to undertake your research ethically and safely with your participants. How you intend to facilitate informed consent from participants must also be outlined in your submitted documents as part of your application through the online platform.

The Research Ethics Panel (REP) will examine your application in detail and will respond to you with any concerns. High Risk applications require significant monitoring so please allow at least 6 weeks prior to the commencement of your proposed research (including any contact with potential participants) for a response from the REP. This will also allow time for adjustments if resubmission is required.

High Risk areas of consideration include:

- **Vulnerable Participants:**

Research involving individuals or groups who are particularly susceptible to coercion or harm, such as children, young adults under the age of 16, prisoners, or those with diminished autonomy.

- **Risk of Harm:**

Projects that pose a substantial risk of physical, psychological (anxiety or stress), or social harm to participants and/or the researcher.

- **Sensitive Topics:**

Research dealing with sensitive issues that could potentially lead to stigma, distress, or other negative consequences for participants.

- **Data Sensitivity:**

The involvement of highly sensitive personal data that requires robust protection measures, for example the use of special category data (as defined by the ICO) or the use of film, photographs or video that can be used to identify a participant (not actors or models).

- **Researcher Position of Authority:**

Situations where researchers have power over participants, such as being an employer, teacher, or family member, which can lead to conflicts of interest or exploitation. Projects where financial or other inducements are offered to participants.

- **Covert Observation:**

Research methods that involve observing participants without their knowledge or consent.

- **Potential for Criminal Prosecution:**

Research that touches on activities that could lead to legal action. Personal data collected that includes special category data or any information about actual or alleged criminal activity or criminal convictions in a form which identifies or could enable identification of the individual.

- **International/Collaborative Research:**

Projects involving different cultural contexts or political sensitivities that could raise complex ethical issues. Projects that take place outside of the UK in circumstances where the researchers are not familiar with the environment. Projects that include the transfer of personal data outside the UK or the EU.

- **Counter-Terrorism and Security:**

Research that may intersect with obligations under laws like the Counter-Terrorism and Security Act.

10. Schedule A

The applicability of this Policy under the University's Collaborative Provision arrangements is detailed below.

Where the Regent's University London Policy applies, collaborative partners may use different terminology, e.g. 'programmes' and 'units' instead of 'courses' and 'modules'.

Cours Florent

10.1 This policy does not apply to Cours Florent students. Students should refer to Cours Florent's policies for applicable policy.

Domus Academy

10.2 This policy does not apply to Domus Academy students. Students should refer to Domus Academy's policies for applicable policy.

Istituto Marangoni (London)

10.3 This Policy does not apply to Istituto Marangoni London students. Students should refer to Istituto Marangoni London's Research Ethics Policy and Procedures.

Istituto Marangoni (Paris)

10.4 This Policy is not applicable to students studying at Istituto Marangoni Paris. Students should refer to Istituto Marangoni Paris' Research Ethics Policy and Procedures.

Liverpool Media Academy (LMA)

10.5 This policy is not applicable to student's studying at LMA. Students should refer to LMA's policies for applicable policy.

MACROMEDIA

10.6 This policy is not applicable to Macromedia students. Students should refer to Macromedia's policies for applicable policy.

Nuova Accademia di Belle Arti (NABA) London

10.7 This policy is not applicable to student's studying at NABA London. Students should refer to NABA London's policies for applicable policy.