Minutes of the meeting of the Open Research Integrity and Ethics Committee held on 20 May 2021 via videoconference at 10:00

Present: Professor Kim Graham (Chair), Dr Rhian Deslandes, Professor William Evans, Professor Claire Gorrara, Professor Kerry Hood, Dr Dawn Knight, Dr Michael Lewis, Judge Ray Singh, Professor Phil Stephens and Dr Chris Whitman.

In attendance: Orosia Asby, Dr Karen Desborough, Dr Maria Fragoulaki, Dr Carina Fraser, Emma Gore, Professor Adam Hedgecoe, Dr Trevor Humby, Dr Fiona Lugg-Widger, Catrin Morgan, Chris Shaw and Alison Tobin.

Apologies for absence were received from: Professor Oliver Ottmann, Dr Jessica Steventon and Professor Ian Weeks.

162   Welcome and introductions

The Chair welcomed everyone to the meeting.

162.1 The Chair welcomed Dr Fiona Lugg-Widger (Early Career Researcher representative), Dr Trevor Humby (Academic representative for BLS – PSYCH), Dr Maria Fragoulaki (Academic representative for AHSS – SHARE) and Professor Adam Hedgecoe (Academic representative for AHSS – SOCSI) as observers. The Committee noted that the above-named individuals shall commence their terms of office as members of ORIEC in September 2021;

162.2 The Committee would like to thank the following for their valuable contributions to the Committee as they have competed their term of office: Michael Lewis (Academic Representative for BLS - PSYCH), Dawn Knight (Academic Representative for AHSS – ENCAP); Jessica Steventon (Early Career Researcher representative).

163   Declaration of interests

No declaration of interests were made during the meeting.

164   Minutes

The Minutes (20/586) of the last meeting of the Committee were approved, subject to the following amendment to minute 160.3:

>   That the Committee supports the Human Tissue Officer role proposal, subject to appropriate consultation with the BLS College Board and relvant Schools to address any potential financial and workload impacts.

165   Matters arising

Received and noted paper 20/587, 'Matters Arising'.

Noted

165.1 That the 'Compliance with External Conflict of Interest Requirements' Policy requires that staff do not make use of University resources when undertaking consultancy work or work for external organisations unless express permission has been granted by their line manager and Head of School/Department. The Committee agreed that the current wording is appropriate, however, the need for further guidance on consultancy should be considered at the next policy review.

166 **Ethics policy for human research**

Received and considered paper 20/588, 'Cardiff University Ethics Policy for Human Research'.

Noted

166.1 That the two main revisions to the policy are:

- The inclusion, at Appendix 2, of the University's framework for the *'Ethical Review of Research using Secondary Data and/or Publicly Available Information only'*;
- The addition of guidance on research involving the use of Social Media Data (or similar internet-based data). This guidance is already available in the ORIEC-approved Template SREC Procedures;

166.2 That all individuals involved in research activity have a responsibility for the ethical conduct of the research and whilst this is made explicit in the Research Integrity and Governance Code of Practice, it would be helpful to have a short statement clarifying this within the policy also;

166.3 That research in the areas of terrorism, extremism and/or radicalisation (or research involving access to materials of such a nature) is a very broad definition. Some Schools are concerned that this broad definition, and the requirement to register such projects, may have a negative impact on undertaking research in this area. In particular, the requirement to register projects that only involve reviewing historic published material is very dissuasive and seems disproportionate to the risk involved;

166.4 That the University has an obligation, under the Prevent duty, to safeguard its staff and students against the risk of radicalisation;

166.5 That the Research Integrity, Governance and Ethics team intends to commence a review of the Security Sensitive Research Policy in 2021;

166.6 That, the additional clarification at 5.4.3 of the Ethics Policy is welcomed, namely that 'Commencing Research activity without a favourable ethical opinion (where ethical review of the research was required), may amount to research misconduct, or academic misconduct in a student context';

Resolved

166.7 That the Committee endorses the revised 'Cardiff University Ethics Policy for Human Research' subject to the addition of a short statement confirming that the ethical conduct of research is the responsibility of everyone involved in a research project;

166.8 That, as part of the review of the Security Sensitive Research Policy, Schools are consulted on the scope of the policy, balanced against the University's requirements to meet its obligations under the Prevent Duty.

167 **Annual review of school research ethics procedures**

Received and considered paper 20/589 'Annual Review of School Research Ethics Procedures'.

Noted

167.1 That nine Schools have fully implemented the new ethics procedures and ten Schools have partially implemented the procedures. The Committee wished to acknowledge that this represents significant progress given the workload challenges for Schools and staff over the last year;

167.2 That a deviation request has been received from JOMEC requesting that its 'practical journalism' courses and projects be exempt from the requirement to use the ORIEC-approved Template Application Form for Ethical Review on the grounds that 'practical journalism' is different to 'academic research' and subject to separate editorial/professional codes of ethics;

167.3 That as a result of concerns about the appropriateness of the ORIEC-approved Template Application Form for Ethical Review for PGT and UG students in JOMEC (and resistance from JOMEC PGT Module Leaders regarding adoption of the form), a deviation request has been received from JOMEC to use a shortened version of the ORIEC-approved Template Application Form for PGT academic research and UG dissertations;

167.4 That whilst the Committee acknowledged that some Schools would favour the preparation of a shortened template Application Form for PGT and UG projects, the majority of Committee Members were in favour of retaining the current form and improving the education and guidance provided to students on completing the form;

167.5 That ethical review must be applied consistently across the University and the process should be the same for all researchers. This protects the participants, and provides protection and support for the reviewers and researchers;

167.6 That Schools, staff and students would benefit from guidance on completion of the Template Application Form and more detail on what is expected in each section;

167.7 That to the extent that the University is able to purchase and/or implement an online ethics application system in the future, this might help to streamline the application process and provide guidance to applicants more easily;

167.8 That a deviation request has been received to allow SRECs to receive a description or draft version of the questionnaires/data collection tools, rather than the final version of such documents, as part of the ethical review process. The main issue for some Schools is the timing of the review of the data collection tools (for example, short turnaround times for student projects and questionnaires/interview schedules co-developed with research participants) and workload involved in reviewing multiple versions of these documents;

167.9 That the majority of Schools that responded to the optional Question 13 on the Annual Ethics Report consider that a research protocol/proposal is largely a redundant document as the information of relevance to SRECs is already captured via the Template Application Form;

167.10 That revisions have been made to the Template Application Form to reflect amendments to central university policy/guidance and/or to reflect previous matters resolved by ORIEC;

167.11 That, to date, RIGE has received thirty-two ethics protocols/standard operating procedures from SRECs;

167.12 That the SREC Annual Report provided an opportunity for SRECs to raise any concerns regarding local workload allocation connected to the ethical review process. A number of SRECs have reported concerns about workload and indicated that the current workload is not manageable and/or the current allocation is not sufficient;

167.13 That there is a need to bring SRECs together to increase knowledge-sharing and discussion of local ethical problems and approaches;

167.14 That whilst there is a dedicated Microsoft Teams page for SREC Chairs and Administrators which was created to facilitate information-sharing, this has largely been utilised by RIGE to date to deliver messages to SRECs and/or to respond to specific queries raised by SRECs about the ORIEC-approved Templates;

167.15 That Section 4 of the paper contains various other matters for ORIEC to note, including Schools that have reported Human Research projects proceeding prior to receipt of a favourable ethical opinion and Schools that have reported other concerns regarding the ethical review process, and that RIGE will undertake a number of actions as set out in Section 4.

Resolved

167.16   That the Chair of ORIEC write to the Chair and members of each SREC to thank them for their hard work and engagement with implementing the new procedures;

167.17   That JOMEC practical journalism projects be exempted from the requirement to utilise the ORIEC-approved Template Application Form given that the Committee is satisfied that such projects are not 'research' (as defined by the University) and are subject to a separate ethical review process within JOMEC utilising the appropriate editorial codes of ethics;

167.18   That the JOMEC request to use a shortened version of the ORIEC-approved Template Application Form for PGT academic research and UG dissertations be rejected and that the School be required to implement the full Template Application Form;

167.19   That guidance on completion of the Template Application Form (particularly for students) be developed and shared across SRECs, building on the work already undertaken by certain Schools;

167.20   That an annual meeting of SRECs be established to improve communication between SRECs and provide training for SREC members. This event should be led by SREC Chairs to enable sharing of best practice, with support from RIGE;

167.21   That, whilst the Committee is satisfied that SRECs be granted discretion whether to review a description, or draft version, of a questionnaire/data collection tool with the Application Form for Ethical Review, SRECs are ultimately responsible for determining whether a Human Research project can be granted a favourable ethical opinion and, as such, SRECs must be satisfied that the relevant data collection tool meets appropriate ethical standards. The SREC must determine whether the information provided with the Application Form for Ethical Review is sufficient to enable the SREC to grant a favourable (or conditional) ethical opinion but, in all cases, SRECs must receive the final version of any data collection tools before these are used and/or issued to participants;

167.22   That, subject to 167.23 below, SRECs be permitted to exercise discretion on whether a 'Research Project Protocol/Proposal' must be submitted to the SREC with the Application Form for Ethical Review (as a supporting document);

167.23   That where a SREC does not receive and/or review a 'Research Project Protocol/Proposal' for a specific Human Research project, the SREC must be satisfied that the applicant has provided sufficient information within the Application Form for Ethical Review, particularly in response to Question 3.1 (project summary), to enable the SREC to understand the project;

167.24   That the Template Application Form be updated to make it clear that submission of a 'Research Project Protocol/Proposal' is essential for any project involving the use of Human Tissue;

167.25 That the next Annual Ethics Report proforma (for completion by Schools) includes a question on the approach taken by the SREC to the submission and review of Research Protocols/Proposals and the SRECs experience of the sufficiency of information provided by applicants in response to Question 3.1;

167.26 That other additions made to the ORIEC-approved Template Application Form by Schools (insertion of additional questions for example) are collated by RIGE and shared with SRECs via the Microsoft Teams page;

167.27 That Schools are not permitted to combine questions as a way of shortening the form;

167.28 That the Template Application Form be revised to reflect the proposed updates set out in paper 20/589 and the decisions set out in minute 167. The updated Template Application Form shall be submitted to the Chair of ORIEC for approval by Chair's Action;

167.29 That a Task and Finish Group be established to review the Ethics Protocols/Standard Operating Procedures received from SRECs. The Task and Finish Group shall be chaired by a College Dean of Research and include at least two academic representatives from each College and at least two members of Professional Services staff;

167.30 That, pending the outcome of the Task and Finish Group, SRECs be permitted to continue to utilise the SOPs that have been developed, noting that these have not yet been subject to review;

167.31 That the full Annual Reports submitted by Schools raising workload concerns are shared with the relevant College Dean of Research so that the extent and nature of the concerns can be understood further;

167.32 That the information received on workload allocation be shared with the workload modelling team.

168 **Research integrity activity update**

Received and considered paper 20/590, 'Research Integrity Activity Update'.

Noted

168.1 That RIGE continues to send communications and liaises with School contacts to help improve completion rates of the University's RI Training;

168.2 That there is little more RIGE can do to help improve completion rates, pending an IT solution to the Learning Central/CoreHR functionality issue, namely the inability to link completion of the training to CoreHR where the training is only mandatory for specific staff sub-sets (rather than being mandatory for all staff);

168.3 That completion of the RI Training has been built into the ORIEC-approved Template SREC Procedures and Application Form for Ethical Review, meaning completion of the training will be mandatory for all SREC applicants once the School has fully implemented the ORIEC-approved templates.

Resolved

168.4 That RIGE will no longer report on RI Training completion rates for REF-eligible staff specifically. Completion rates for these individuals will continue to be captured as part of reporting for Academic Staff (those on R/T&R/T&S pathways, and clinical equivalent pathways);

168.5 That the Chair of ORIEC raise RI Training completion figures with the College Deans of Research and School Directors of Research with a view to discussing ownership of these metrics and local actions to improve completion rates;

168.6 To facilitate the above, that 'Research Integrity' be added as an agenda item at an upcoming Directors of Research meeting;

168.7 That the Chair of ORIEC has a discussion with HR regarding the completion of mandatory RI Training on the standard PDR documentation.

169 **Compliance and risk update**

Received and considered paper 20/591, 'Compliance and Risk Update'.

Noted

That a Data Protection Impact Assessment (DPIA) is a project-specific exercise that must be undertaken in specific circumstances, mainly where a project involves high-risk processing. However, a Record of Processing Activity (ROPA) is a broader exercise that involves recording the types of processing that take place within the University.

170 **Reports received by the committee**

Received and noted papers 20/592 'DWG report to ORIEC', 20/593 'Responsible Research Assessment (RRA) Health Check', 20/595 'BSC Chair's report to ORIEC', 20/596 'HTSC report to ORIEC'', 20/597 CTIMPGG report to ORIEC' and 20/598 'OROG report to ORIEC'.

Noted

Responsible Research Assessment Health Check

170.1 that the Chair of ORIEC, as Pro Vice Chancellor for Research, Innovation and Enterprise, is developing an action plan and governance structure to address research culture across the University;

BSC Chair's report to ORIEC

170.2 that the Home Officer Inspector attended the March meeting, as an observer;

170.3 that an Extraordinary meeting was held in April to revisit a previous decision made by the Committee that an applicant not be supported in making another project licence application. The Committee upheld its previous decision;

HTSC Report to ORIEC

170.4 That many of the University's existing 'Human Tissue Officers', who are in place across the University's Schools and Colleges, are members of Academic Staff;

170.5 That some of the 'Human Tissue Officer' role is administrative in nature, as such the HTA team will be consulting with Schools and Colleges in relation to the future of the role;

170.6 That the University should put in place research-specific guidance for staff and students leaving the University, and this should be provided to staff and line managers at the point when a researcher hands in their notice.

OROG report to ORIEC

170.7 that the Chair of ORIEC, as Pro Vice Chancellor for Research, Innovation and Enterprise, is giving some further thought to who is the appropriate Chair for OROG moving forwards and where this area of work best sits, namely whether it should be aligned with 'research culture' or the University's 'research data' initiatives.

Resolved

Responsible Research Assessment Health Check

170.8 That the Health Check should enable a broader conversation with Schools regarding research culture. The Health Check should not be distributed to Schools until a later stage, when broader research culture objectives can be added to the document;

HTSC Report to ORIEC

170.9 That guidance and a checklist for researchers leaving the University should be developed in conjunction with HR and the College Deans of Research.

171 **Any other business**

Noted

171.1 That in light of current political events and unrest in some areas of the world, Freedom of Speech is gaining a lot of media attention and it is important that the University continues to balance Freedom of Speech against its other legal obligations, particularly around safeguarding;

171.2 That the University's Compliance and Risk Team is satisfied that the University's Freedom of Speech Code of Practice is fit for purpose and has been sufficiently tested;

171.3 That whilst remote working and a general move towards online events has posed some challenges to our internal procedures around Freedom of Speech and external speakers, the University continues to receive a steady stream of notifications of external speakers and the current processes appear to be working.

Resolved

171.4 That the Secretary to ORIEC liaise with the members of the Committee to determine preferences for the future format of meetings, for example video conference vs face-to-face meetings.

Date of next meeting 28 September 2021, at 9:30.