

University of Kent

RESEARCH ETHICS & GOVERNANCE COMMITTEE

Annual Report to Senate 2021-22

The Committee reports:

The Committee met on 14 October 2021, 2 February and 17 May 2022. All meetings were held via Teams, in line with COVID-19 measures. Despite being unable to meet in person, meetings had good attendance and we were able to hold our usual thorough discussions on all agenda items. Members were invited to training held online by the Research Ethics & Governance Manager.

Items discussed during the 2021-22 academic year include:

1. MEMBERS' UPDATE

The Committee heard members' experiences of research activity following lifting of COVID-19 restrictions, and any problematic issues. The issue of an online research ethics review system was widely discussed, including problems encountered with work and limited resources to adapt the existing School of Psychology system to make it suitable for use in other Schools/Divisions.

2. ESTABLISHMENT OF THE NEW UK COMMITTEE ON RESEARCH INTEGRITY (UK CORI)

In response to a recommendation raised by the review of research integrity by the House of Commons Science & Technology Committee in 2018, a new UK Committee on Research Integrity is being established and will be hosted, at least initially, by UK Research & Innovation.

The main anticipated impact this Committee could have on universities could be in potentially setting some reporting requirements within an assurance process.

3. NEW GOVERNMENT R&D PEOPLE AND CULTURE STRATEGY PUBLISHED

Following the focus, in recent years, on problems with research culture and its effects on research integrity, with reports published by a number of bodies, such as the Royal Society, the Wellcome Trust, and the Nuffield Council for Bioethics, the Government has published a Strategy document setting out some of the measures that are planned to improve the research culture in the UK.

4. REPORT ON ETHICS AND GOVERNANCE OF ARTIFICIAL INTELLIGENCE FOR HEALTH ISSUED BY WHO

Members' attention was drawn to this World Health Organisation document which may be useful as it sets out to establish some ethical principles that should be considered with the use of Artificial Intelligence, specifically in healthcare, and in settings such as low- and middle-income countries as well as high-income settings. These suggested principles may be useful for those reviewing the ethical implications of research projects involving AI, and not just in the delivery of healthcare.

5. UKRI GUIDELINES ON ETHICAL RESEARCH IN FRAGILE AND CONFLICT-AFFECTED CONTEXTS

Guidelines have been developed by UKRI in collaboration with UNICEF that may be useful to researchers who are planning research projects in fragile and conflict-affected contexts to be able to fully consider the ethical issues that are specific to those kinds of contexts. A summary of the guidelines, along with a link to the original document, was provided to members.

The guidelines have been designed to provide an assessment tool that can be used while writing the protocol, and they identify ethical issues that funders will expect to see addressed in funding proposals. However, the guidelines will be useful to anyone negotiating research in these kinds of areas.

UKRI have also developed guidelines for reviewers that will be used when making decisions on funding, and a link to those is included in the summary.

6. INTERFERENCE BY BOTS IN ONLINE SURVEYS

This item was prompted by a question from a member who is involved in a research project led from another institution. Part of the study involves an online survey which underwent extensive testing and data security analysis before being launched. There is also a dedicated programmer working on the survey.

However, the sample frame includes closed and private Facebook sites, and the survey has been continually attacked and overrun by bots. These bots damage the integrity of data collected and create data authenticity issues.

The research team has been forced to remove the survey link from Facebook sites and has had to ask that the link to the survey is not reposted or shared to try to avoid infiltration by bots.

The Committee discussed the issue, and while no other members reported direct experience of the problem, a number of measures were agreed. It is likely that the open sharing of the link to the survey on social media is the reason behind the bot infiltration, so REAG documentation will be amended to raise awareness of this with applicants and reviewers to ensure mitigating action is taken to avoid potential bot infiltration. The guidance paper on the issue drafted by the Research Ethics and Governance Manager will be added to the CREAG website.

7. UPDATE ON PLANS TO ESTABLISH RESEARCH ETHICS REVIEW PROCEDURES IN KMMS

The Research Ethics and Governance Manager updated the Committee on KMMS plans following a meeting with the Medical School Manager.

Since its establishment, KMMS has been focused on teaching, and this has inevitably meant a delay in setting up research ethics and governance procedures. They also have not had dedicated administrative support to do this work. However, they now have fixed-term funding to appoint a Research Manager, to start, hopefully, in September. It is planned that the new person will spend some time working in the Research Ethics and Governance Office, learning about Kent requirements for research ethics review. They will then be supported to adapt the template documentation that has already been approved by the Research Ethics and Governance Committee and will work on instituting a KMMS Research Ethics Advisory Group.

It is planned that this will be in place by the end of this calendar year, in time to receive student applications from January 2023.

In the interim, the Central Research Ethics Advisory Group has been asked to take on review of any KMMS research that needs it. The Research Ethics and Governance Manager confirmed that she has agreed to this, having been reassured that it will be limited to staff research, the numbers of applications will be quite low, and proposals will be within the expertise of CREAG reviewers. An update on progress, including with any currently unresolved issues, has been promised by KMMS for July.

8. CENTRAL RESEARCH ETHICS ADVISORY GROUP (CREAG) UPDATE

Having been formed during the pandemic, the CREAG has not yet had the opportunity to operate during 'normal' times, and so it is useful to be able to assess activity, and any issues and problems, as application numbers increase following easing of pandemic-related restrictions and the resultant increase in research activity.

There has been a significant uplift in activity with applications in the first five months of this year matching those for the entirety of last year. During the busiest period of March and April 2022, each reviewer was asked to undertake a review every four to six weeks. However, there have been delays in receiving reviewer responses, due to a number of issues, including reviewer sickness, workload pressures, and non-response. As CREAG is not currently meeting its promised timescale of 10 working days to an initial outcome, it is being considered to extend this time to 15 working days. A warning of delays has been included on the CREAG website for some months, but this will be amended to formalise the extension to timescales. While this is not ideal, it is important that applicants are given a clear idea of how long their application will take to reach a final outcome.

Members discussed the reasons for the reviewer delays and agreed that the University restructure into Divisions has not reduced the administrative burden on academic staff. The Work Allocation Model (WAM) allowance for the REAG role is not equitably applied across the University and in some areas provides insufficient time for ethics reviewing tasks.

It was agreed that this Committee should act to ensure formal recognition for REAG duties is included in School/Division WAM calculations. Schools/Divisions will be contacted with a reminder of the role specifications for REAG chairs and reviewers, and a summary of the estimated workload per reviewer, based on numbers of applications received.

9. CLARIFYING RESEARCH ETHICS REVIEW REQUIREMENTS FOR PURE DATA-DRIVEN RESEARCH

This item was prompted by a question from a CREAG reviewer. Within the Kent research ethics review procedures, it is intended that the wording on the checklist document is sufficient to identify research which raises material ethical issues, and therefore requires a full review, even where there is no direct involvement of human participants. However, a CREAG reviewer has suggested that the wording is ambiguous, and leaves researchers working with data only, effectively having to decide for themselves whether or not to submit their study for review.

Discussion of this issue raised a number of points:

- Policy and guidance documents make it clear that research involving data only does raise potential ethical issues. These include:

- Possibility that individuals could become identifiable from combination of de-identified data points
- Secondary use of data falling outside of original consent provided
- Secondary analysis of administrative or secure data requiring permission from appropriate authorities before use
- Data sourced from social media may be considered to be within the public domain, but raises a number of well documented ethical concerns
- Some journals require that an ethics review must be undertaken for systematic reviews and meta-analyses.

It was agreed that our policy is robust, and procedures and guidance are sufficient to capture data-driven research. However, checklist wording will be amended to avoid misunderstanding and provide improved clarity on the requirements for research ethics review. The new wording will be shared with Research Ethics Advisory Groups.

10. ONLINE RESEARCH ETHICS REVIEW SYSTEMS

The Chair reported that online research ethics review systems were discussed at the University Ethics Committee, with the Research Ethics and Governance Manager providing details of outline costs for a number of proprietary modules, including the Worktribe add-on to the research information management system that has already been purchased by the University. While the costs may seem high in isolation, the benefits in reduction of administrator time, efficiency of review experience for applicants and reviewers, and improvement in reporting capability, would more than compensate.

The Research Ethics and Governance Manager confirmed that she is gathering information from external colleagues on systems that are in use at other universities, and she will also take into account the internal solutions that are currently being used by Schools. These findings, and an ultimate recommendation, will be included in an application for funding to be submitted later in the year.

11. ANNUAL REPORTS FROM RESEARCH ETHICS ADVISORY GROUPS

Reports were received from the following REAGs:

- Brussels School of International Studies
- Centre for the Study of Higher Education
- Digital and Lifelong Learning
- Kent Business School
- Kent Law School
- Medway School of Pharmacy
- School of Anthropology & Conservation
- School of Physical Sciences
- School of Psychology
- School of Sport & Exercise Sciences
- SSPSSR Staff & Research Centres
- SSPSSR Students
- Tizard Centre
- Central Research Ethics Advisory Group.

12. RESEARCH MISCONDUCT

There have been no formal investigations of research misconduct.