

**MIDDLESEX UNIVERSITY****ASSURANCE COMMITTEE****UNIVERSITY ETHICS COMMITTEE****Ethics Policy Framework Statement****Introduction**

The University is committed to operating in an ethical way in every area to ensure the highest possible standards of decision-making and accountability. This statement provides the context of a range of policies, regulations and codes that cover specific issues with an ethical dimension. These are available on the intranet and a link is provided below. Additionally, staff members are required to adhere to any relevant legislation including that, which is specific to their area of responsibility.

The Ethics Policy Framework Statement sets out the role and responsibilities of the University Ethics Committee, the guiding principles and values, and the system of governance. The principles of public life have been adapted from those found in the Second Report of the Committee on Standards in Public Life to be applicable to staff, governors and students of the University, its collaborative partners, and to those providing a service to the University. It relates these principles and values to the personal and professional behaviour expected of its staff as specified in the Middlesex University Values and Valued Ways of Working Framework: <https://www.intra.mdx.ac.uk/about-us/middlesex-strategy/our-values/Our-Values-and-Valued-Ways-of-Working.pdf> This framework outlines our the professional behaviours expected of all staff irrespective of role. Our Middlesex values and valued ways of working guide our decision making; how we work together; with our students; and how we collaborate with partners and other stakeholders.

**The University Ethics Committee**

The Committee has an oversight of all aspects of ethical matters at the University. It will monitor and review the activities and resources used to support, implement and embed ethics into our practices. This will include providing guidance and advice to Faculties and Services and individual members of staff, collaborative partners, visiting academics and honorary researchers on activities carried out in the name of Middlesex University that may have ethical implications e.g., arising from teaching, research, and professional and institutional practice.

The Committee will monitor and review on a regular basis a range of related policies that impinge on the work of the University Ethics Committee to ensure adherence to ethical principles. They will also make available, in a central place, reference material on ethical guidelines produced by professional bodies, funding councils and other national bodies for appropriate implementation, and organize appropriate training on ethical issues. This will include recommendations about specialist ethical guidelines to be adopted to cover specific areas of academic, research activity and professional practice. Currently this information can be found at <http://mdx.mrooms.net/enrol/index.php?id=12277> (Log in required).

Finally, the Committee will consider issues concerning ethics referred to the University Ethics Committee by any other university body and to advise on wider aspects of University life/activities that may have ethical implications (internal or external).

**Guiding Principles and Values**

The University recognises that it must earn and maintain a reputation for integrity that includes, but is not limited to, compliance with laws and regulations and its contractual obligations. In many areas of

activity, there are no relevant laws or regulations. In these cases, as in all others, the University will operate within a framework established by the Seven Principles of Public Life<sup>1</sup>.

The University Ethics Committee has an agreed set of core behavioural values that all staff should demonstrate in all they do:

**Honesty and integrity**

This is more than observing professional standards: it is about being open, truthful and demonstrating considered and sound judgment. In all our work we will act ethically and avoid conflicts of interest, or take decisions in order to gain financial or other material benefits for ourselves. To this end we will declare and resolve any interests and relationships and be honest and offer constructive feedback.

**Mutual support**

In all our working relationships we treat others with consideration, dignity and respect and build a strong ethos of sharing and consultation. For example, consult and involve others in decisions and try to understand each other's points of view.

**Strong personal commitment to colleagues and students**

We aim to understand people's needs and to see things from our students', colleagues' and customers' perspectives. We seek and listen to others' feedback, show them that we care and deliver what we say we will.

**Taking personal responsibility**

We demonstrate a strong sense of responsibility to students, colleagues and the University. We are flexible, where appropriate, and challenge ourselves to do better. All staff members are expected to act honestly, conscientiously, fairly, reasonably, and in good faith at all times, having regard to their responsibilities, the interests of the University, (its mission and core values) and the rights and interests of colleagues and students.

**Governance**

In order for the University Ethics Committee to fulfill its remit, all Faculties and Services should have established mechanisms to undertake ethical scrutiny<sup>2</sup>. In Faculties/Schools there is a requirement to have the facility to scrutinise ethical matters with regard to research, practice and teaching, and report on these matters to the University Ethics Committee.

The University Ethics Committee is a sub-committee within the Academic Board structure and therefore its remit is to report to the Assurance Committee on ethical matters within the University.

Key University policies and related documents (i.e., people policies A-Z, financial and purchasing policies, IT policies, copyright, data protection, intellectual property, research policies, security policies, and ethical matters) can be found on the intranet at: <https://www.intra.mdx.ac.uk/tools-policies/policies-and-guidance/policies-a-z>.

Our public policy statements including those related to academic quality, concerns and complaints, data protection, employability, the environment, equal opportunities, estates and security, ethics policies and

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<sup>1</sup> These are: Integrity, objectivity, openness, selflessness, accountability, honesty, and leadership. <http://www.bis.gov.uk/files/file46965.pdf>.

<sup>2</sup> Ideally each Faculty/School will have its own Ethics Committee, reporting to the University Ethics Committee, with sub-committees/Research Ethics Committees at School/Subject level where appropriate. The current reporting structure is provided in Appendix 1. The terms of reference for the University Ethics Committee is provided in Appendix 2. Terms of reference for sub-committees have been agreed at the UEC in January 2019 - see Appendix 3.

statements related to research and the use of animals in research, teaching and practice, freedom of speech, health and safety, information law and policy, including the MU whistleblowing/confidential reporting policy and procedure, widening access and working with our partners and friends etc, can be found at <https://www.mdx.ac.uk/about-us/policies>. Statements and policies related to research integrity can be found at <https://www.mdx.ac.uk/our-research/research-integrity>.

Our policies and procedures are regularly reviewed and updated, and follow specific reporting arrangements, and may be subject to auditing as determined by the University Audit Committee. Non-compliance with policies and procedures may result in disciplinary action.

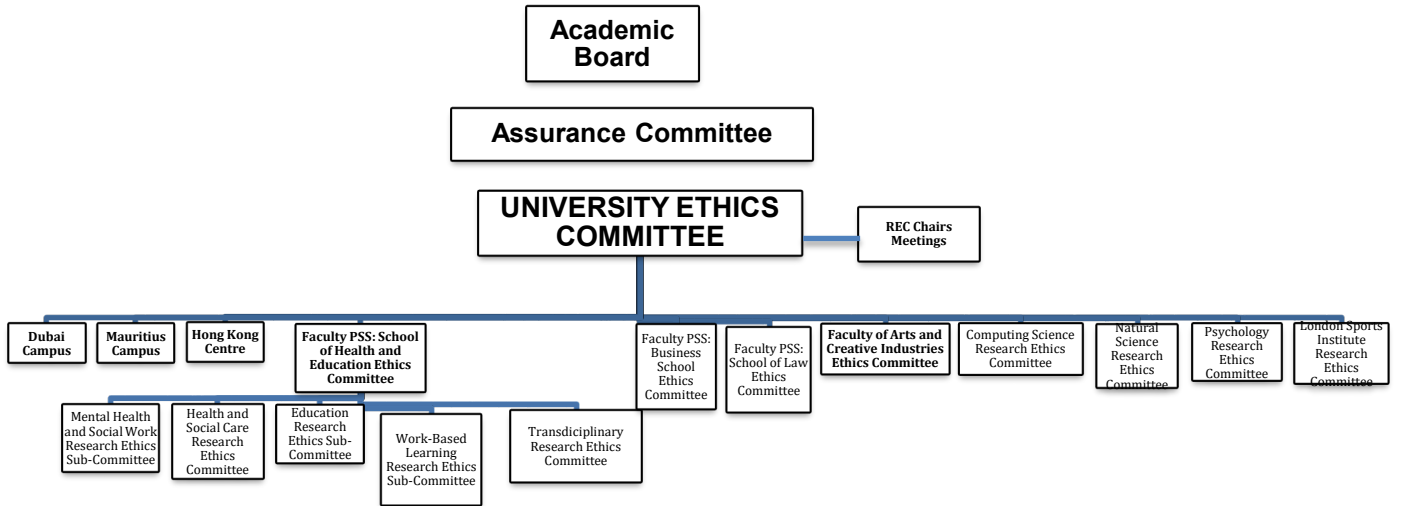
TC: May 2014

***This Framework Statement was approved by the Assurance Committee July 2014. It is due for review in July 2019.*** 

TC/UEC: Updated April 2019

***This Policy Framework Statement was approved by the Assurance Committee May 2019. It is due for review in May 2024.***

**Appendix 1: Current reporting Structure for the University Ethics Committee and its Ethics Committees**



## Appendix 2: The Role of Ethics Committees in Middlesex University

Overall responsibility for ensuring consideration of ethical issues in teaching and practice and the ethics of research carried out in the name of Middlesex University rests with the University Ethics Committee through a delegated reporting structure to Faculty/School level and their Ethics Committees. This allows Faculty/School Ethics Committees to be responsive to the following conditions and constraints:

- The expectations of funding bodies
- The expectations of key professional bodies
- The requirements of relevant Codes of Conduct
- Timely consideration of ethical issues and requests for ethical approval from staff and students by appropriate qualified and experienced staff
- To provide advice and guidance on ethics related issues in respect of all aspects of policy and practice

### UNIVERSITY ETHICS COMMITTEE (UEC)

The Committee has an oversight of all aspects of ethical matters at the University. The Committee owns, maintains and develops the University Ethics Policy Framework and related documents: The University Research Ethics Policy Framework and the University Statement on the Use of Animals in Research, Practice and Teaching. The Committee reports to the Assurance Committee.

### UEC Terms of Reference

1. Maintain and develop the University Ethics Policy Framework and related documents in line with best practice and appropriate national and international standards and guidelines, to cover specific areas of academic activity and professional practice through regular monitoring and reporting to the Assurance Committee.
2. Monitor, review, comment on and/or make available related policies and procedures, which impinge on ethical issues within the University and disseminate/make available new and revised policies and procedures to staff and students.
3. Monitor, review, comment on and/or make available lists of relevant reference materials on ethics produced by Professional Statutory and Regulatory Bodies (PSRB's), funding councils and other national bodies, alongside documents pertaining to legal processes and the law, and disseminate/make available new and revised materials to staff and students.
4. Provide guidance and advice to Campuses, Schools/Faculties and Services and individual members of staff, collaborative partners, visiting academics and honorary researchers on activities carried out in the name of Middlesex University that may have ethical implications e.g. arising from teaching, research and institutional practice, as specified in the University Code of Conduct: Principles and Procedures.
5. Monitor research ethical approval processes through the submission of annual Campus, Faculty, School Ethics Committee reports, minutes of REC Chair's meetings, and audit report procedures to the University Ethics Committee.
6. Have oversight of collaborate partner procedures for research ethics, matters of concern relating to research ethics and reviewing and approving research ethics applications.
7. Consider, approve, withhold or withdraw approval for research proposals referred by School Ethics Committees where issues may arise from concerns and remain unresolved.

8. Consider complaints of ethical misconduct referred by Ethics Sub-Committees and/or where necessary refer unresolved complaints to the Director of Research or complaints to the MU Whistleblowing Policy and Procedure.

9. Make arrangements for training on ethical matters.

10. Formulate institutional responses to national and international developments relating to ethical issues, in conjunction with other committees where appropriate.

### **Frequency of Meetings**

The Committee shall meet not less than twice a year. Quoracy for formal decisions to be set at 50% of membership.

### **Membership**

- Member of the Assurance Committee (Chair)
- Chairs or representatives of each Ethics Sub-Committee and/or Research Ethics Committee
- The Human Tissue Authority (HTA) Designated Individual
- A member of staff from the University's Corporate Marketing Department (as required)
- Two members of Professional Support Services
- Human Resource Services
- Director of Student Affairs or representative
- Representative from CCSS
- Representative from Academic Partnerships
- Two co-opted members, as required, either internal or external (appointed by the committee)
- A representative of Middlesex University Students' Union (nominated by the MDXSU President)
- Secretary to the committee
- Data Protection Officer (ex-officio)
- Representative of the University's Equality and Diversity Committee (ex-officio)
- Director of Research

Updated July 2018 and Approved by Assurance Committee April 2019- amendment to the UEC Terms of Reference reflected above.

### **Appendix 3: CAMPUS/FACULTY/SCHOOL ETHICS COMMITTEE**

The functions of Campus/Faculty/School Ethics Committees include the approval of all staff and student (UG, PG and research degree) research/project proposals and to implement and improve arrangements for ensuring good ethical standards e.g., through staff training and up-dating and within all levels of academic provision and practice.

The key principles of the Campus/Faculty/School Ethics Committees and Sub-committees includes:

- Maintaining robust procedures in each subject area and/or at Faculty/School level
- Utilising the existing knowledge and experience of staff members appropriately
- Improving arrangements for and attention to user involvement issues in research processes

- Awareness of diversity within the Campus/Faculty/School and the promoting discussion, understanding and adoption of good practice of different approaches adopted by distinct subject areas where appropriate
- Awareness of the distinct requirements in different areas e.g., clinical work, field work, placements etc.

For example, ethics committee arrangements in the School of Health and Education need to be responsive to the following conditions and constraints:

- The expectations of funding bodies (e.g. Department of Health and ESRC) and of the NHS and partner institutions
- The expectations of key professional bodies

To implement and improve arrangements for ensuring good ethical standards, there are a number of related needs including:

- The need for continuing staff training and updating
- The need to build attention to ethical issues into core curricula and academic practice

### **Terms of Reference**

1. Campus/Faculty/School level responsibility for ensuring staff and students give close attention to ethical issues in their proposals for and in the conduct of research activities carried out in the name of Middlesex University, whether externally or internally funded or unfunded
2. Provide and/or request guidance and/or training for staff and students to ensure research is conducted safely and appropriately in accordance with the ethical principles as specified in the University Code of Conduct: Principles and Procedures and meet the requirements of the Law e.g., with regard to Data Protection
3. Identify specific codes of professional conduct relevant to the subjects within the Campus/Faculty/School and ensure that appropriate ethical dimensions are incorporated within undergraduate and postgraduate /research degree provision and ethical approval processes for staff and students.
4. Liaise with Campus/Faculty/School Executive and/or University Ethics Committee and/or relevant professional bodies and external ethics/ governance committees (e.g. NHS REC) on ethical issues.
5. Liaise with the Campus/Faculty/School Research Degrees Committee on ethical issues, ensuring close attention is given at the registration, transfer or programme approval stages and final (viva voce) examination of each research student's career
6. Review, approve or withhold approval for research proposals referred by staff and student researchers within and associated with the School – this may be delegated to relevant Sub-committee/Subject Ethics Committees
7. Refer unresolved applications to the University Ethics Committee
8. Self-monitor ethical approval procedures through the preparation of annual Campus/Faculty/School Ethics Committee reports, including sub-committee reports where appropriate, for submission to the University Ethics Committee
9. Manage complaints of ethical misconduct and where necessary refer unresolved complaints to the University Ethics Committee
10. Support regular (tri-annual) auditing of Campus/Faculty/School and Subject/Departmental Ethical Approval Procedures – including database information and associated correspondence – to ensure good practice and improvements are identified and shared across the Campus/Faculty/School/Subject area, and with the University Ethics Committee for wider implementation
11. Provide an annual report to the University Ethics Committee on the work and findings of the Campus/Faculty/School Ethics Committee and sub-committees where appropriate.
12. Disseminate and where appropriate, implement, the recommendations of the University Ethics Committee

13. Maintain independence, confidentiality and impartiality from school and department structures and management in respect of ethics applications, processes and procedures.
14. Manage and consider applications for formation of new ethics sub-committees and where supportive, recommend applications for formal approval by the University Ethics Committee.
15. Manage the appointment, training and development of the Chair and Deputy Chair to the Faculty/School Ethics Committee and Chairs and Deputy Chair for each of the ethics sub-committees.
16. Ensure that the Campus/Faculty/School Ethics Committee and associated sub-committees have adequate resources, both in terms of academic staff reviewers and administrative support and resources.

#### **Membership of Campus/Faculty/School Ethics Committees**

- Chair of the Campus/Faculty/School Committee (as appointed by the University Ethics Committee)
- Chairs of sub-committees (and/or where appropriate, nominee deputy chair)
- Invited member(s) with special expertise where appropriate
- Chair of the relevant Research Degree Board (or where appropriate nominee deputy chair)
- Chair of the relevant Research Board of Studies/PVG (or where appropriate nominee deputy chair)
- Independent member: normally the Chair (or where appropriate nominee deputy chair) from another MU ethics committee

#### **Secretary**

- Assigned Administrator

#### **Frequency of Meetings**

- Twice per year

#### **Role and responsibilities of the Chair**

The role of the Chair of the Campus/Faculty/School Ethics Committee is:

- To lead on ethics development processes in association with other relevant process leads/Chairs of Sub-committees.
- To uphold and be a spokesperson for ethics processes and functions, and ensure that appropriate ethics practices are maintained and developed.
- Ensure that the ethics committee is active in supporting and promoting ethics good practice.

#### **Role and responsibilities of a member of the Campus/Faculty/School Ethics Committee**

- To actively participate in supporting the ethics committee in promoting and sharing ethics good practice.
- To update the committee regularly on the activity and work of relevant sub-committees.
- To participate in department and school wide training and development initiatives.
- To uphold and be a spokesperson for ethics processes and functions within the relevant department and ensure that appropriate ethics practices are maintained and developed.

#### **Role and responsibilities of the Secretary to the Campus/Faculty/School Ethics Committee**

The Secretary to the ethics committee should provide administrative support the committee and chair in the following functions:

- The liaison with the chair of the ethics committee in arranging future meetings (two per year; e.g., May and November) and events proposed by the committee. Circulation and recording of minutes of meetings and documents of interest to the committee.



- Provide administrative support to the chair in the role of University Sponsor Representative in respect of external ethics committee applications.
- Record and provide appropriate documentation for staff and student external ethics applications, where agreed by the chair.
- Maintain confidentiality of the committee.

### **CAMPUS/FACULTY/SCHOOL ETHICS SUB-COMMITTEES – i.e. SUBJECT SUB-COMMITTEES/RESEARCH ETHICS COMMITTEES (RECS)**

These committees have responsibility for ensuring staff and students give close attention to ethical issues in their proposals for and in the conduct of research activities carried out in the name of Middlesex University, whether externally or internally funded or unfunded.

#### **Terms of Reference of Campus/Faculty/School Ethics Sub-Committees (RECs)**

1. On behalf of and reporting to the Campus/Faculty/School Ethics Committee, Ethics Sub-committees or Subject sub-committees function to consider applications for research from both staff and students, involving human subjects, human materials and other data – hence also known as RESEARCH ETHICS COMMITTEES (RECs);
  - a. to either give written approval for such proposals or provide written information as to why approval has not been given;
  - b. to consider revised submissions;
  - c. to refer to the Campus/Faculty/School Ethics Committee cases which cannot be satisfactorily resolved or about which there is uncertainty
  - d. to operate procedures no less rigorous than those suggested or required by relevant professional bodies and other relevant local and national bodies/institutions.
  - e. to inform the Campus/Faculty/School Ethics Committee of any changes in the ethical codes of professional bodies in relevant discipline areas, in order that the Campus/Faculty/School's and University's procedures remain valid.
2. Provide and/or request guidance and/or training for staff and students (in negotiation with the school ethics committee) to ensure research is conducted safely and appropriately in accordance with the ethical principles as specified in the University Code of Conduct: Principles and Procedures and meet the requirements of the Law e.g., with regard to Data Protection
3. Liaise with the Campus/Faculty/School Research Degrees Committee on ethical issues, ensuring close attention is given at the registration, transfer and programme approval stages of each research student's career
4. Self-monitor ethical approval procedures through the preparation of an annual sub-committee report, for submission to the Campus/Faculty/School Ethics Committee
5. Manage complaints of ethical misconduct within the Subject sub-committee and where necessary refer unresolved complaints to the Campus/Faculty/School Ethics Committee, to the UEC or the Director of Research
6. Support regular auditing of Subject Ethical Approval Procedures – including database information and associated correspondence – to ensure good practice and improvements are identified and shared across the Campus/Faculty/School, and with the Campus/Faculty/School Ethics Committee for wider implementation as relevant
7. Provide an annual report to the Campus/Faculty/School Ethics Committee (or directly to the UEC in the absence of a Faculty/School Ethics Committee) on the work and findings of the sub-committee.
8. Disseminate and where appropriate, implement, the recommendations of the Campus/Faculty/School Ethics Committee
9. Maintain independence and impartiality from Campus/Faculty/School and department structures and management in respect of ethics applications, processes and procedures.

**Membership**

- Chair – appointed by the ethics committee/University Ethics Committee
- Reviewers, trained and appointed by the sub-committee and Campus/Faculty/School Ethics Committee
- Campus/Faculty/School Ethics Committee Chair and/or nominee chair of another school sub-committee
- Invited member(s) with special expertise where appropriate

**Secretary**

- Administrator appointed and trained by the Campus/Faculty/School Ethics Committee and Sub-committee from appropriate university administrative support.

**Frequency of Meetings**

- Twice per year or as required

**Role and responsibilities of the Chair**

The role of the Chair is:

- To lead on ethics development processes within the subject area in association with the school ethics committee and other relevant process leads/Chairs of Sub-committees.
- To uphold and be a spokesperson for ethics processes and functions within the school and ensure that appropriate ethics practices are maintained and developed.
- Ensure that the ethics sub-committee is active in supporting and promoting ethics good practice.
- To report annually on the activities of the sub-committee to the Campus/Faculty/School Ethics Committee.
- To attend bi-annual Campus/Faculty/School Ethics Committee meetings (or nominee) and report on the activity of the sub-committee.
- To lead bi-annual sub-committee reviewer/member meetings.

**Role and responsibilities of Reviewers**

- To actively participate in supporting the work of the ethics sub-committee in promoting and sharing ethics good practice.
- To participate in reviewing appropriate applications for ethics approval from MU students and staff and to make recommendations for approval or amendment/resubmission of applications to the Chair and / or Deputy Chair.
- To participate in subject area and school wide training and development initiatives.
- To uphold and be a spokesperson for ethics processes and functions within the relevant subject area and ensure that appropriate ethics practices are maintained and developed.
- Maintain confidentiality of the work of reviewers, for example not to discuss any applications or applicants outside of the sub-committee.

**Role and responsibilities of the Secretary to the Sub-committee**

The Secretary to the sub-committee should provide administrative support to the committee and chair / Deputy Chair in the following functions:

- To liaise with the chair of the sub-committee in arranging sub-committee meetings (normally two per year; for example; May and November) and events proposed by the sub-committee.
- Circulation and recording of minutes of meetings and documents of interest to the sub-committee.
- Provide administrative support to the chair in contacting applicants and reviewers as requested, for example to follow-up applications returned for revision, applications sent out for review and applications that may be close to the recommended response date.
- Support the Chair / Deputy Chair in managing the MORE Form database

- Maintain confidentiality of the sub-committee records and reviewers

### **Research Ethics Committee (REC) Chair Meetings**

These meetings have become a formalized approach to bringing together the Chairs of Research Ethics Committees across the University to focus on operational issues related to the MORE system and related research ethics processing needs.

#### **Terms of reference –**

- a. To share good practice, expertise and provide support to REC chairs
- b. Facilitate the development of a research ethics learning community
- c. Feedback on issues and development needs for the MORE system
- d. Identify training, information and support needed on other aspects related to research ethics e.g., data protection

#### **Reporting to**

- University Ethics Committee

#### **Members**

- All Ethics Sub-Committee/REC chairs
- DP Officer
- MORE Support Administrator
- Chair: REC Chair on a rotational basis

#### **Frequency of Meetings**

Twice per year.