British Council Research Ethics Policy

This document provides an overview of the key ethical principles to which the British Council's research activity and outputs must adhere. It should be consulted when planning research activity and must be reviewed at the very start of a new project by the Senior Responsible Officer (SRO) and Project Manager. Its principles must be adhered to throughout the full lifecycle of the project.

Some British Council research activities may require permission from a government agency or other authority – if so, this policy can and should be made available to those authorities, if required.

This Policy should be followed alongside the British Council's Code of Conduct and Global Policy framework – with particular reference to the Safeguarding policies for Children and Adults, Information Security and Management policy, the Equality, Diversity and Inclusion (EDI) policy and guidance, and their respective processes. It has been developed in line with the Concordat to Support Research Integrity and in consultation of other external research ethics guidelines, policies and documents. For a full list of reviewed documents, refer to Appendix I.

The Policy is distinct and separate from the British Council's ethical screening and due diligence processes that are to be followed when developing a new business relationship with or awarding grants to another organisation or individual.

For queries relating to this Policy, or about research ethics and good research practice more generally, contact the Research & Policy Insight team via the Head of Research at research.risk@britishcouncil.org

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Professional standards and research integrity

All research activity must ensure that high professional standards are adhered to. The integrity of research activity is essential for the responsible practice of research.

- All policy requirements, costs and capacity for assuring ethics and good research practice must be worked into research or programme plans (and any contract)
- Any conflict of interest must be declared
- Research must be conducted according to relevant and required legal and professional frameworks, obligations and standards, including the principles of the Concordat to Support Research Integrity
- All sources of ideas, data, information, text or other intellectual property must be comprehensively referenced (including previous British Council reports and digital sources including social media)
- The input of authors and other contributors to the research must be appropriately acknowledged
- Permission and agreement for a research output to be published should be obtained from all those listed as an author of the output
- All research involving human participants must adhere to the principles outlined below relating to informed consent and the right to anonymity
- All aspects of the research process should be culturally contextualised and aligned to British Council values and EDI principles – this includes the framing of research questions, objectives and outputs, methodology design and the selection of suppliers, partners and participants
- British Council Country Directors should be made aware of research taking place in those countries at the beginning of the process
- For research commissioned or contracted by the British Council, accountability for ensuring that suppliers undertake that research in an ethical manner lies with the British Council SRO; there should be regular reviews of issues relating to research ethics and risk as part of the wider project management process

2. Risk assessment and management

I. General principles

All research activity must identify and review potential risks to all people and institutions involved (including physical, psychological, professional, reputational and legal risks) and how those will be mitigated. Guidance for British Council staff on how to do this can be found on the internal Risk Management SharePoint pages.

- Each project must have a named owner for risk management. This is typically the responsibility of the Project Manager

- All research activity should have a **Risk Register** that identifies and logs risks, which should be completed and updated accordingly throughout the research activity
- Project Managers are encouraged to upload **Risk Registers** to the central British Council risk register or, as a minimum requirement, to ensure that they keep and regularly update a local copy of the Register and that this is made available to the Research & Policy Insight Team when and if required

II. Secure and sensitive research activity

If research activity is classified as 'secure and sensitive' based on the criteria listed below, the project is also required to be submitted for full ethical review, via the Head of Research at research.risk@britishcouncil.org

Projects must be submitted for full ethical review if they are found to be classified as 'secure and sensitive' because they involve one or more of the following criteria:

- The research is conducted or involves fieldwork in geographically high-risk locations
- The research presents significantly increased danger of physical or psychological harm for researcher(s) or subject(s), either from their association with the research process or from publication of research findings
- The research allows access to identifiable personal data for or potentially sensitive information relating to living individuals or involves other data protection and security concerns that require specific consideration or specialist attention (see section on **Data Protection and Security**)
- The research is commissioned under an EU security call and involves the acquisition of security clearances
- The research concerns threat from or study of terrorist or violent groups (noting that that the British Council cannot undertake any research that involves terrorist organisations or groups proscribed by the UK Government)
- The research concerns participants who are children under 18, adults at risk or other subjects who may unable to give fully informed consent
- The research concerns prisoners or others in custodial care (e.g. young offenders)
- The research concerns animals
- The research involves human physical contact
- The research is subject to another risk or concern identified by the staff member or country office responsible for managing the research

III.   Research in high-risk, unsafe or politically-sensitive locations

As noted above, at the initial stages of research, all research activity must identify and review potential risks and how those will be mitigated. For risks related to high-risk, unsafe or politically-sensitive locations, the following principles must be adhered to:

- At the research inception stage, risks related to the location of research activity must be identified with mitigation plans proposed
- Research design, data collection methods, questions and analysis must be appropriate for the context, demonstrating an awareness of the sensitivities and the local context and possible risks that may arise regarding research participants, researchers and/or the British Council in terms of safety and reputational damage
- The British Council's travel risk assessment must be completed prior to departure of travel and/or commencement of data collection activity
- The relevant British Council in-country teams must be notified of research activity taking place and/or researchers and colleagues arriving in high-risk locations, with necessary documentation and procedures completed prior to arrival

3. Research involving human participants

I.   General principles

All research activity that involves human participants must ensure that a 'do no harm' approach is adhered to, with the below principles incorporated into the planning, data collection and dissemination stages as a minimum standard. Anonymity of research participants should be maintained as the default approach of British Council research; where this is not followed there should be a clear rationale and the risks must be identified and clearly mitigated.

Researchers must take all possible means to ensure that unequal power structures are acknowledged, and measures are taken to limit the possibility of reproducing unequal power structures, whether between researchers and respondents, between respondents, or between the different researchers involved in the project.

- All research involving human participants should ensure that risks are minimised, and benefits maximised
- All projects involving participants must have a participant information form that provides information on the project
- Details on participant information forms should include but are not limited to, the following: What the research is about; The organisations and partners involved (including their roles, and the funding); Its aims and objectives; How data will be handled and stored; How long data will be stored for and processes

for destruction of data; How the research and data will anonymised for possible reuse; How the research and data will be used and disseminated and who the audiences are

- Participant information forms must also provide contact details for the British Council Safeguarding team and Safecall service for anonymous reporting of any issues or concerns relating to the conduct of the research that participants do not feel able to raise with the research team itself and/or with the British Council staff involved in the management or delivery of the project. (For further expectations and responsibilities of researchers and British Council staff around **Misconduct and Whistleblowing**, see below.)

- Informed consent for participation by those over the age of 18 must be provided in written form – if deemed not safe to do so or the participant is unable to do so, informed oral consent must be provided and documented by the interviewer. (For those under the age of 18 and adults at risk, see below.)

- If verbal rather than written consent has been provided, this must be adequately documented

- All participants must be warned in advance about any potential risks of harm, including: Physical or mental harm; Risk of information sharing and data protection; Risk of exposure to adult subjects (in the case of youth participants); Reputational risk; Risk to job security or employment prospects

- Where risks to participants have been identified, including both psychological and emotional as well as physical risks, appropriate support must be given to participants in order to manage and mitigate these risks

- All participants must be allowed access to the overall findings and their own data, should it be requested

- Participants must be given the option to not participate in the research following a briefing and to withdraw their participation at any time during the process – in this event, any related data collected from the participant(s) will be destroyed according to British Council policy

- Participants must be given the option for their involvement to remain anonymous

- Particular sensitivity to safeguarding and consent should be applied when working with children and youth (under the age of 18)

- Particular sensitivity should also be applied when working with sensitive groups (religious/political) and to risk involved to participant identity in quoting interviews and to the use of photographs or visual identification such as film

- The British Council's Equality, Diversity and Inclusion policy and guidance and Safeguarding policies for Children and Adults should be adhered to all throughout all research activity to ensure that the access to and participation in research activity and the development, delivery and engagement of research is ethical, equitable inclusive and provides equal opportunity to those involved

Risks to the ethical, equitable and inclusive conduct of the research, and agreed mitigation strategies, should be identified and logged in the **Risk Register**

II. Research involving children or adults at risk

In addition to the above principles on research involving human participants, when conducting research that involves children (under the age of 18) or adults at risk of harm (also known as vulnerable adults), the following principles must be adhered to.

Particular attention should be paid to incorporate the British Council's [Equality, Diversity and Inclusion policy and guidance](#) and [Safeguarding policies for children and adults at risk](#) into any research activity that involves child and adult participants deemed at risk. This is in view of conditions in the external environment which may bring such participants into harm, factors relating to the research itself that may mean participants could become vulnerable through taking part, or due to factors relating to the participants themselves, e.g. age, disability, ethnicity or race, gender, religion or belief and/or sexual identity.

- Identification of children, at risk adults and groups, and the risks and benefits associated with including them within the specific research activity, must be conducted within the planning phase, included in the **Risk Register** (see above) and regularly reviewed throughout the research process
- As noted above, researchers must take all possible means to ensure that unequal power structures are acknowledged, and measures are taken to limit the possibility of reproducing unequal power structures, whether between researchers and respondents, between respondents, or between the different researchers involved in the project
- Procedures to mitigate risk should be included in the **Risk Register**, as well as provision of appropriate support so that children or adults at risk can feel respected and participate with confidence knowing that their safety is prioritised
- Where research is conducted outside of the UK, any difference between the British Council's safeguarding standards and those of the local context must be identified and incorporated into the **Risk Register** at the beginning of the research process and reviewed throughout

Specifically for research activity that involves **children**:

- The British Council conducts a no tolerance risk approach to child safeguarding, meaning that all necessary efforts must be made to comply with the British Council's policy
- Permission through free and informed parental consent and consent of the child should be gained prior to the study

- There should be regular check-ins with the child and their parents throughout the research process to confirm their willingness to continue
- Any digital components of the research that include child participants must also adhere to the stated principles to ensure both physical and digital safety of children

Specifically for research that involves **adults at risk**:

- Free and informed consent from a designated guardian is required in addition to the particular adult at risk, if the adult at risk is determined to be unable to provide free and informed verbal and/or written consent
- There should be regular check-ins with the designated guardian throughout the research process to confirm their willingness to continue
- To assess whether the research activity includes adults at risk, British Council staff can refer to the internal Adults At Risk Assessment Tool found on the intranet

4. Data protection and security

Data collection during research activity must be accompanied by an agreed method and approach to data protection, in line with the following principles. This includes the collection of data through qualitative or quantitative methods, in person or digitally, and through primary and/or secondary research.

- The research practice and the collection, storage, management and publication of participant and partner information must adhere to the General Data Protection Regulation (GDPR) and the Data Protection Act, 2018
- Personal data (information that relates to an identified or identifiable individual) should only be gathered if it is essential for the specific research aims of the project, and a detailed strategy must be agreed to ensure all personal data collected will be kept confidential and anonymous
- Particular attention must be given to the risks and ethics of research that: (i) Involves the processing of personal data concerning children, vulnerable people or people who have not given their consent to participate in the research; (ii) Involves profiling, automated decision-making, data-mining techniques, big-data analytics and artificial intelligence, as such processing operations may pose higher risks to the rights and freedoms of data subjects; (iii) Involves international transfers of data to or from countries outside the UK or EU where researchers may be subject to different ethical rules or where treatment of the data may fall short of GDPR standards
- Data must be collected through secure, open and transparent means and written and/or verbal consent must be obtained even when accessing

secondary data (including from social media platforms, from mobile devices and in email communications)

- Where media data is collected for research purposes, this must be stated in the information about the campaign, programme material or in an information sheet, and participants must be offered the chance for their data to be excluded
- Data gathered via social media or other platforms which may directly or indirectly reveal user's identity or be recognisable, should be anonymised or avoided
- Research data should be validated and stored appropriately, and provision to delete records made – this includes research data gathered through mobile and digital devices, and social media methods
- The Project Manager and Researchers must take measures to ensure confidentiality, privacy and data protection and retention during and beyond the end of the project – including in data sharing and linkage – and to ensure that all participants are informed if and for how long their data will be archived
- Collaborative projects should have clear responsibilities for data creation, management and archiving between the project partners, suppliers and consultants and these should be set out in any formal Collaboration Agreement and data management plan

5. Research collaboration and partnerships

For research activity that involves the commissioning of, partnership with and/or collaboration with an external partner, consultant or supplier should adhere to the following principles in order to ensure that the partnership will meet the standards and needs of the British Council and related aims of the activity.

The British Council's standard template for Research Collaboration Agreements with external research consultancies and suppliers can be obtained from the global contracts portal or from the Research and Policy Insight Team at research.contracts@britishcouncil.org.

- An appropriate Collaboration Agreement or contract must be signed to govern all research partnerships, commissions or collaborations
- There must be clear agreement with all external partners and consultants around the roles, responsibilities and financial contributions of all parties. This will also govern the management of intellectual Property Rights, confidentiality, data protection, and the publication and dissemination of research outputs
- The roles and contributions of all partners and consultants involved in a project must be made clear to the research subjects and participants

- For research commissioned by the British Council, responsibility for assessing and mitigating ethical risk and review lies with the supplier contracted or commissioned to carry out the research – in the UK or in country
- Accountability for ensuring that suppliers undertake that research in an ethical manner lies with the British Council SRO; there should be regular reviews of issues relating to research ethics and risk as part of the wider project management process
- Where research is undertaken as a joint partnership between the British Council and a partner organisation, there is a joint accountability between the British Council and the partner to ensure that research is undertaken in an ethical manner and this should be outlined in Collaboration Agreement
- For fieldwork or in country studies, the commissioned researcher or Research Organisation is responsible for assessing ethical concerns and assuring that the ethical research conduct of all third parties commissioned to carry out fieldwork in country are aligned with this policy
- The commissioned researcher should be provided with a contact in the local British Council country office if the British Council staff member managing the research is not based in the country in question
- Researchers commissioned by the British Council should highlight the risks as per their own institution's ethics policies to the British Council staff responsible for the research project
- If the concern relates to child participants (under the age of 18) or at-risk adults, the British Council's Safeguarding policies for children and adults should be followed
- For commissioned research, British Council procurement processes – including the assessment of supplier proposals – must include appropriate review and scrutiny of how the contracted researchers will manage risks and ethical issues relating to the research
- For all research commissioned by the British Council, should there be any conflict or discrepancy between the British Council Research Ethics policy and that of the research supplier or partner, the British Council policy will apply and should be adhered to in all circumstances, unless local legal requirements stipulate that this is not possible
- Queries, concerns or issues relating to the above principle should be brought to the attention of the Research and Policy Insight team (via the Head of Research at research.risk@britishcouncil.org)

6. Dissemination and accessibility of research outputs

Research activity must adhere to the following principles, including reviewing considerations and requirements relating to equality, diversity and inclusion (EDI). For

further guidance on mainstreaming EDI, British Council staff can consult the British Council's EDI equality policy and Guide to Mainstreaming on the EDI pages of the intranet.

- The research outputs and any notes relating to the research design and methodology must be appropriately archived and shared with the Research and Policy Insight team for inclusion in the British Council's internal Research Library
- There should be a clear data management plan, outlining responsibilities for data creation, management and archiving
- Research outputs funded by the British Council's FCDO grant or other public funds should be made as freely available as possible, including via the British Council website and/or via external open-access repositories
- Research outputs funded by other external grants should be made available in line with the funder's open access policies and requirements
- In all cases, research outputs should be made available in a timely manner and as openly available as possible, acknowledging that (i) commercial sensitivities may require this to be on a paid-for basis and (ii) there may be cases where considerations of safety and 'do no harm' principles dictate that it is not possible to make (part of) the research publicly available at all
- Any limitations on the openness and accessibility of research outputs should be raised in as timely a manner as possible with the Research and Policy Insight team (via the Head of Research at research.risk@britishcouncil.org)
- All funding sources must be acknowledged in any publication or publicity
- Where feasible and appropriate, research outputs should be published and licensed to third parties under the terms of a Creative Commons Attribution Non-Commercial 4.0 International Licence
- Appropriate licences, permissions or consents must be obtained in connection with Intellectual Property Rights
- Particular attention should be paid to the requirements of data protection legislation – including the Data Protection Act 2018 – where personal data is involved, as well as the general he principles of minimising harm, respecting people's rights and dignity and not breaking confidentiality
- Dissemination of research outputs should be considered as part of the overall research design and reviewed throughout the research project – ensuring that the formats, languages and platforms that will be used to share and disseminate outputs meet the needs of, and are accessible, to all participants and the intended audiences and beneficiaries
- Activity should take EDI principles into account and may require particular thought and consideration where audiences or beneficiaries are likely to include (for example) people with low literacy rates, disabled people, adults at risk, or children

7. Misconduct and whistleblowing

British Council staff and external research partners and suppliers involved in the management or delivery of research activity have a duty to report anything they feel may be unethical or contrary to the principles of this or any other British Council policy. Criminal behaviour should be reported directed to the police.

- This applies both to research conducted by British Council staff and to research commissioned to external consultants or undertaken in partnership with external organisations
- External research partners or consultants must be made aware of which British Council staff are responsible for the research project at the outset in order to enable the appropriate reporting of any concerns that may arise
- Such staff will include: i) The Project Manager or commissioner; ii) A local country office contact if the research is being undertaken (in part or in full) outside the country from which it was commissioned; and iii) The Research and Policy Insight team
- External research partners or consultants must also report any concerns about research misconduct as per their own organisation's ethics procedure

Concerns about and allegations of research misconduct, should they arise, will be addressed by the British Council through the following **three stage process**:

- **Stage 1**: Reporting to the British Council Project Manager responsible for the research project and attempted resolution locally, with the Research and Policy Insight team being notified (via the Head of Research at research.risk@britishcouncil.org) but not directly involved

If this is not possible or the resolution is deemed unsatisfactory, the misconduct or concern will be escalated, as follows:

- **Stage 2:** Internal investigation into the issues raised, overseen by the Head of Research, to be initiated within 10 working days of the escalation

- **Stage 3:** If resolution is not possible or deemed unsatisfactory following this initial investigation, the issue will be escalated by the Head of Research to the Director of Research and Policy Insight and the Research and Evaluation Board for further assessment and formal investigation, to be completed within 28 days of the issue being escalated and conducted in line with the appropriate British Council policies

Anyone involved in a research project (including British Council staff and external research partners and suppliers, as well as research participants) may also contact the British Council's Safeguarding team and/or use the external Safecall service for anonymous reporting of any issues or concerns relating to the conduct of the research,

should they not feel able to raise these with the British Council Project Manager responsible for the research project.

As part of the recruitment process, all research participants must be made aware of how to report concerns confidentially. It must be made clear that confidentiality will not be breached except in circumstances where a child or adult at risk is at risk of harm and where action is necessary to ensure they are protected.

Appendix I

The following documents were reviewed to support the development of this Policy:

Universities UK Concordat to support research integrity (2012, updated 2019)

RCUK Policy and Guidance on Governance of Good Research Conduct (2013, updated April 2017)

DFID Ethical Guidance for Research, Evaluation, Monitoring activities (2019, updated January 2020).

Oxfam undertaking research with ethics guidelines (2012)

York University Code of Practice on Research Integrity (2019)

EU Horizon 2020 Guidance Note - research on refugees, asylum seekers and migrants (2016, updated January 2020)

EU Horizon 2020 Guidance Note – social science and humanities (October 2018)

EU Horizon 2020 Guidance Note – ethics and data protection (November 2018)

University of Cambridge Policy on the Ethics of Research Involving Human Participants and Personal Data (2016, updated October 2018)

BOND – putting the people in the picture first, Ethical guidelines for the collection and use of content (July 2019)

UKRI Whistleblowing – Freedom to speak up Policy (2019)

UKRI Equality, diversity and inclusion policy (n.d.)

Universities UK Concordat to support research integrity (2012, updated 2019)

University of Edinburgh Research ethics and data protection briefing note (n.d.)

British Library Code of Good Research Practice (2018)

Code of Conduct for Social Science Research UNESCO (n.d.)