

Research & Insight

Research Ethics Policy

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Introduction

The Research Ethics Policy (The Policy) provides the key ethical principles and processes to which the British Council's research activity and outputs must adhere to.

To learn more about the values and approaches that guide the British Council's research activity and underpins The Policy, refer to our Research Statement [here](#).

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.

The Policy has been developed in line with the [Concordat to Support Research Integrity](#), considerations regarding equitable and inclusive knowledge production and Open Science, 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 more information related to research ethics and good research practice, contact the Research and Insight Team at: research.risk@britishcouncil.org.

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Scope

The Policy is relevant to:

1. All British Council colleagues who are involved in any research activities, conducted internally or by external research suppliers.

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2. All external research suppliers who work with the British Council on any research activity.
 3. All research activity conducted by the British Council throughout the entire lifecycle of the activity.

The Policy is to be reviewed:

1. At the start of research activity by the Senior Responsible Officer (SRO), and Project Manager, and shared with the relevant stakeholders involved, such as external research suppliers, advisory boards and steering groups, and if required for research permission, the relevant authorities.
2. During the delivery of the research activity if ethical questions or concerns arise.

Policy statement and Principles

1. 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. Research integrity involves adhering to ethical principles, honesty, transparency, and accountability in all aspects of conducting and using research.

- All policy requirements, costs and capacity for assuring ethics and good research practice must be worked into research planning and contracts
- 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

- All research projects should have a designated British Council Research Project Team comprised of a Senior Responsible Officer (SRO) who can assume ownership and accountability for the project, and a Project Manager who oversees the day-to-day management. In certain instances, the SRO and Project Manager may be the same person. See the Roles and Responsibilities section below for more details

2. Equitable and inclusive knowledge production

All research activity should include appropriate steps to ensure that the design, management, generation and use of research appropriately reflects the British Council's approach to Equality, Diversity and Inclusion (EDI) and values related to inclusive and equitable knowledge production. British Council staff can consult the British Council's EDI [equality policy](#) and [Guide to Mainstreaming](#).

- The procurement of research suppliers should adhere to the British Council's [Equitable and Inclusive Research Procurement Guidelines](#)
- The British Council's Research Project Team should consult the British Council's [Guidelines for the Use of Language in Research](#) ensuring that the language(s) used are appropriate and enable research suppliers, participants and audiences to engage fully with the research activity
- The procurement, design, delivery and dissemination of research activity should seek as much as possible to actively include diverse perspectives and input from representatives of various social, cultural, linguistic and geographical backgrounds, including Indigenous peoples
- Those with direct experience and knowledge of the research context should be actively included throughout the lifecycle of the project to strengthen the design, delivery and dissemination of the research – for example, as part of the British Council's Research Project Team, through the suppliers and partners involved, through Advisory Groups or other forms of consultation, or through participatory research practices and co-creation opportunities
- Barriers to participation in and access to the research activity should be identified within the Risk Register and mitigated within project management planning
- Unequal power dynamics within and between the research team and/or participants should be identified during the inception stage of the research activity, and steps to mitigate and address this should be collaboratively agreed between all parties involved in the delivery of the research activity
- The research activity should seek permission and credit the inclusion, contribution and/or authorship of all relevant parties who have contributed to the research, whilst adhering to data protection requirements - for example through official authorship credits, photography credits, or in the acknowledgements. It is the right of the contributor to decide if and how they want to be credited, if at all.

3. Risk assessment and management

a. 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
- Research risk registers should be maintained, reviewed, and updated regularly. Research Project Managers should follow the relevant internal review process and storage location for these risk registers – for example, projects funded through Cultural Engagement Global Programmes should follow the MCC and risk registry process. It is the responsibility of the Project Manager to identify and comply with the relevant internal processes. For more information, British Council colleagues can refer to the [Risk Management Sharepoint](#) or contact the Research and Insight team via. Research.Risk@Britishcouncil.org

b. Secure and sensitive research activity

If research activity is classified as ‘secure and sensitive’ based on the criteria listed below, an ethical screening is to be submitted for the activity, and if determined to be required, an ethical review. Submitting your ethical screening document is to be done via the Head of Research Excellence at research.risk@britishcouncil.org The process for an ethical screening and review can be found in the ‘internal controls’ section of The Policy.

Projects must be submitted for an ethical screening and 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 be unable to give fully informed consent
- The research concerns prisoners or others in custodial care (e.g., young offenders)

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- 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

c. 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 risk related to high-risk, unsafe or politically sensitive locations, the following principles must also be adhered to.

- At the research inception stage, risks related to the location of research activity must be identified with mitigation plans proposed
- If the research activity is taking place within a conflict or post-conflict context, a conflict-sensitive approach¹ must be built into the project management of the research activity
- Research design, data collection methods, questions and analysis must be appropriate for the context, demonstrating an awareness of the sensitivities of the research context and 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

4. Research involving human participants

a. 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 activity.

- All research involving human participants should ensure that risks are minimised, and benefits maximised
- All research involving participants must have a participant information form that provides information on the activity

¹ A conflict-affected or post-conflict context refers to environments affected by violent conflict, war, or instability, and the period following such conflicts, where societies are recovering and rebuilding.

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

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- The British Council's [Guidelines for the Use of Language in Research](#) should be considered, in order to help ensure that the language(s) used in the research process and research tools promote the active inclusion and engagement of all research participants – for example, Participant information forms and Consent forms, questionnaires and discussion guides should be translated into relevant languages, and information and updates about the activity should be communicated in relevant languages

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

b. 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, sex and 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 activity
- 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 research 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 or guardian consent and consent of the child should be gained prior to the study

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- If the research is being conducted through an institution, such as a school, informed consent must be given by the governing authority (e.g., head teacher), the parent or guardian, and the child
 - There should be regular check-ins with the child and their parents, guardian or governing authority 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 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, the British Council's Research Project Team can refer to the internal Adults At Risk Assessment Tool [found on the intranet](#)

c. Research involving Indigenous Peoples

In addition to the above principles on research involving human participants, the following principles must be adhered to when conducting research that involves Indigenous peoples and communities.

- The Six R's Indigenous Framework (Respect, Representation, Relevance, Responsibility Reciprocity and Relationships) should be considered and reflected upon throughout the design, delivery and use of the research
- Free, Prior and Informed Consent (FPIC), a specific right granted to Indigenous peoples and communities as per the UN Declaration of Rights of Indigenous Peoples, must be granted to Indigenous peoples and communities involved in research activity and any activity taking place on their territories
- The research lifecycle should factor in any culturally specific processes for consent and permissions, consultation, validation and data ownership - for example, by engaging with community leaders and authority bodies

5. 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.

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- 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 research, 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 activity 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 activity – 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 activities 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
 - Participants should be aware of their data being used for other purposes outside of the particular research activity that they are involved – for example, further analysis, use in another research activity and/or shared with third parties such as open science databases (e.g. the UK Data Service), participants should be aware of this and able to opt in or out of this, via the consent form or other relevant documentation

6. Research collaborations, partnerships and commissions

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 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 Insight Team at researchglobal@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
- Any power dynamics within the research activity should be considered and ways to mitigate unequal power relations between the British Council and partners and consultants should be addressed within the appropriate Collaboration Agreement or contract
- The roles and contributions of all partners and consultants involved in research 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
- 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

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- 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 research commissioned or contracted by the British Council, it is the responsibility of the research supplier to confirm to the British Council Research Project Team that formal approval for conducting the research has been received. This also includes any formal ethics approval from the research supplier’s governing body or authority.
 - 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 Excellence at research.risk@britishcouncil.org)

7. Dissemination and accessibility of research outputs

Research activity must adhere to the following, based on the principles of Open Science, and include considerations and requirements relating to equality, diversity and inclusion (EDI). For further guidance on accessibility and mainstreaming EDI, British Council staff can consult the British Council’s EDI [equality policy](#), [accessible events](#) 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 that are funded by the British Council’s FCDO grant or other public funds, and are a part of one of the British Council’s Global Programming are encouraged to be included in any IATI submissions.
- 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 Excellence at research.risk@britishcouncil.org)

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- All external 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
 - All research products must have a Digital Object Identifier (DOI) assigned to them, and can be obtained by the British Council's Research Project Team via the Research and Insight Centre of Excellence.
 - 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 – 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. For guidance on the use of language at the dissemination stage, refer to the British Council's [Guidelines for the Use of Language in Research](#)
 - Activity should take EDI principles into account and may require 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, and those with caring responsibilities
 - Datasets deemed to be of potential broader research interest should be made available to the Research and Insight Team at researchglobal@britishcouncil.org to determine whether the datasets should be made publicly available through submission to the [UK Data Service](#) or other open-access repositories

8. Misconduct and Whistleblowing

Examples of misconduct may include but are not limited to:

- Data integrity violations, including fabrication, manipulation or misrepresentation of data and findings
- Plagiarism and authorship issues, including using others work without proper attribution and accreditation, and falsely listing authors
- Consent and privacy breaches, including failing to obtain consent according to The Policy, and violation of privacy and adhering to confidentiality principles
- Deception and exploitation, including misleading and exploiting the research and those involved in the research, including the project team, stakeholders and human participants
- Conflict of interest and financial misconduct, including not disclosing personal or financial interests that may bias the research, and misusing allocated funding

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, following the process outlined in 'Internal Controls.'

- 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 activity at the outset 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, in addition to the British Council's process, outlined in 'internal controls.'
- 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
- Criminal behaviour should be reported the police, directly

9. Artificial Intelligence (AI)

For research activity that includes artificial intelligence (AI), the following principles must be adhered to:

- The use of AI must be proportionate and adhere to a Do No Harm approach, ensuring that the safety, security of research participants and data is secured
- The use of AI is to be reviewed in relation to the British Council's Equality, Diversity and Inclusion values, to ensure that any discrimination or bias is identified and mitigated
- The use of AI is to adhere to the data protection and security principles included in The Policy, and in accordance with international and local laws on use of data
- The use of AI is to be proportionate and relevant to the needs of the research activity
- The use of AI is to be conducted by those with a strong understanding and capability of using such technologies
- The use of AI and the nature of use is to be disclosed in any communication of the research activity (e.g., report, webpage, presentation slides, presentation notes). The nature of use is to accurately represent its capabilities, limitations and not misrepresent or overinflate its abilities, use or purpose

10. Incentives and compensation

An incentive is something to encourage participants to participate in research, such as a cash payment, a voucher, free meals and/or transportation. Compensation is a payment to cover any costs associated with participating in research activity, such as travel costs, lost wages due to taking time off or cost of childcare.

- An incentive or compensation cannot and must not be used as an attempt to influence responses.
- An incentive or compensation cannot have any impact on or be influenced by any existing or future relationship that the participant has with the British Council.
- It is the responsibility of and at the discretion of the British Council's Research Project Team (and any external suppliers involved) to decide on any appropriate incentives and compensation for research participants
- The decision to offer incentives and/or compensation should be decided based on an assessment of the benefits and risks associated with incentives and compensation offers. Benefits include enhancing the fair treatment of participants, rewards for time, and counteracting extractive practices. Risks include undue influence to participate that may jeopardise the safety and wellbeing of participants, and reinforcing unequal power dynamics.
- The Research Project Team should decide its offer based on the following considerations: whether the activity is deemed 'secure and sensitive,' if participants are defined as children, adults at risk and/or Indigenous peoples, the nature and location of the research, the requirements of participation, and the budget available
- The practicalities and logistical challenge of providing incentives and/or compensation should be considered but cannot be a sole determining factor in not offering incentives and/or compensation. If it is deemed appropriate to offer incentives or compensation, efforts should be made to overcome any logistical challenges
- If the research activity is conducted within a conflict-affected context, the decision to offer incentives and/or compensation must also be considered in relation to any risks to the physical safety and wellbeing of participants – for example, potentially requiring participants to travel to a location within an active conflict zone
- All incentives and compensation must be relevant to the context of research participants, the nature of the research, and the requirements of participation. The British Council's Global Travel Rates can provide guidance on compensation costs.
- All incentives and compensation must be considered in relation to broader power dynamics between the researcher and participant, the safety and wellbeing of the participant and others, and the voluntariness of consent to participate
- All incentives and compensation must be communicated to research participants during first contact and recommunicated throughout their participation

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- If incentives are offered, the incentive must be provided to all participants, regardless of their individual circumstances
 - If compensation is offered, compensation can be decided on a case-by-case basis and does not necessarily need to be provided to all research participants. If this is the case, there must be a clear rationale for this approach to mitigate any feelings of being 'left out,' 'favouritism,' and creating or exacerbating intercommunal tensions
 - Compensation shall be at least equal to any costs accrued by the research participant

Internal Controls

Before the commissioning of the research activity

- **Ethical screening and review**

If the British Council's Research Project Team considers the research activity to be 'Secure and Sensitive' (based on the criteria outlined above) at the initial design stage, they are required to follow the below process for an Ethical Screening and if required, Ethical Review:

- Step 1: The SRO and Project Manager should complete the Ethical Screening Form (available via the Research Centre of Excellence) and email this to the Research and Insight Team via research.risk@britishcouncil.org. Advice and guidance on completing this form may be available from the regional Research Champions network and the Research & Insight Team Single Points of Contact (SPoCs), subject to available capacity and expertise.
- Step 2: Within 5 working days of receipt, the Research and Insight Team will contact the SRO and Project Manager to confirm if they believe that further consultation is required, and an Ethical Review is to be conducted.
- Step 3: Within 14 working days the Research and Insight Team will liaise with the SRO and Project Manager to convene a panel of colleagues from across Research and Insight, and the country/region/sector relevant to the research activity, to review the documentation and offer a resolution.

If your Ethical Screening and Review processes proceeds to Step 3, research plans should be put on hold until the ethical review has been completed and approval is granted.

- **Setting up a risk register and mitigation plan**

Prior to delivering your research activity and regardless of whether it has been defined as 'Secure and Sensitive,' the British Council's Research Project Team must ensure that a risk register and mitigation plan has been set up and signed off by the SRO.

During and after the delivery of the research activity

- **Reviewing the risk register**

The risk register must be reviewed and updated at the agreed frequency defined by the SRO and Project Manager. The frequency must be at a minimum of once every 6 months.

- **Risks that occur (not related to misconduct), including those not included in the risk register**

If a risk has materialised and existing mitigation plans are not sufficient, the British Council's Research Project Team is required to seek additional guidance:

- Step 1: The SRO and Project Manager should contact the relevant colleagues within their country/region/sector and attempt to resolve the issue locally. The Research and Insight Team should be notified via research.risk@britishcouncil.org, but will not be directly involved in the resolution at this stage.

If local resolution is not possible, or the resolution is deemed unsatisfactory, the concern should be escalated as follows:

- Step 2: The Research and Insight Team is to be notified via research.risk@britishcouncil.org with a request for advice or to intervene.
- Step 3: The Research and Insight Team will liaise with the SRO and Project Manager to convene a panel of colleagues from across Research and Insight, and the country/region/sector relevant to the research activity, to assess the situation and offer a solution.

- **Misconduct and Whistleblowing**

Concerns about and allegations of research misconduct will be addressed by the British Council in the following three stage process:

- Step 1: Concerns about allegations of misconduct should be reported to the Project Manager responsible for the research activity, and attempted to be resolved locally. The Research and Insight Team via research.risk@britishcouncil.org should be notified, but will not be directly involved in the resolution

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

- Step 2: The Head of Research Excellence shall be notified via research.risk@britishcouncil.org and an internal investigation will be raised within 10 working days of the escalation

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

If anyone involved in the research activity feels that they are not able to raise issues or concerns with the Project Manager and/or SRO, they may contact the British Council's safeguarding team and/or use the external [Safecall service](#) for anonymous reporting.

Criminal behaviour should be reported the police, directly.

Roles and Responsibilities

British Council's Research Project Team

- **The Senior Responsible Officer (SRO) must:**
 - Understand The Policy, and ensure that the Project Manager and any external suppliers have access and adhere to The Policy and other relevant British Council policies and guidance at the beginning of the research activity lifecycle
 - Ensure that the Project Manager has created and frequently reviews the risk register with the relevant stakeholders – for example, external suppliers - and implements risk mitigation plans
 - Be available to resolve any issues or where relevant, escalate to relevant colleagues, in accordance with the internal controls outlined above
- **The Project Manager must:**
 - Ensure that the British Council's Research Project Team and all relevant stakeholders have access and adhere to The Policy and other British Council policies, where relevant, throughout the research activity lifecycle
 - Ensure that a risk register is in place, and frequently reviewed throughout the lifecycle of the activity, with the relevant stakeholders – for example, external suppliers
 - Ensure that risk mitigation plans are finalised and implemented
 - Ensure increased attention is given throughout the lifecycle of the activity regarding consent, wellbeing and safety, in relation to research activity defined as 'secure and sensitive,' as above
 - Notify the SRO, or if not possible, follow the internal controls outlined above of any risks or issues that arise at any point of the lifecycle of the activity, and contradict the Policy, and/or jeopardise the ethical integrity of the research, wellbeing and safety of those involved, and reputation of the British Council and other stakeholders

External Suppliers

- **The External Supplier must:**
 - Ensure that all activity is carried out in accordance with the Policy, and aligned with other relevant British Council policies, where relevant
 - Ensure increased attention is given throughout the lifecycle of the activity regarding consent, wellbeing and safety, in relation to research activity defined as 'secure and sensitive,' as above
 - Notify the British Council via the Internal controls outlined above, of any risks or issues that arise which contradict the Policy and jeopardise the ethical integrity of the research, wellbeing and safety of those involved, and reputation of the British Council and other stakeholders

Research & Insight Team

- **The Director of Research and Insight** is the owner of The Policy, responding to issues and ethical reviews escalated to them personally or via the internal controls outlined above. The Director of Research and Insight is also responsible to briefing the Research and Evaluation Board on The Policy and any escalated issues and ethical reviews as per the internal controls outlined above
- **Head of Research Excellence** is responsible for overseeing the review of The Policy, and responding to issues and ethical reviews that are escalated to them personally via research.risk@britishcouncil.org
- **The Director of Research and Insight and Head of Research Excellence** are responsible for ensuring that the internal controls outlined in this document are consistently and fairly implemented across the organisation.

Other

- **The Research and Evaluation Board** is responsible for reviewing and signing off on The Policy, reviewing and deciding on escalated ethical reviews, and play a role in socialising The Policy across the British Council
- **The Research Champions** play a role in advising on the relevant processes outlined in the 'Internal Controls' section, and socialising The Policy within their respective regions
- **Single Points of Contacts (SPOCs)** play a role in advising on the relevant processes outlined in the 'Internal Controls' section and socialising The Policy within their respective regions.

Policy Review

The Research Ethics policy is required to be reviewed according to the below criteria and whichever occurs first:

- After 3 years from the date of the last review
- When amendments to the principles and/or internal controls outlined in this document are required
- There is a change in the policy owner

Key Definitions

- **Research Integrity:** The adherence to ethical principles like honesty, transparency, and accountability when conducting research.
- **Conflict of Interest:** A situation where personal or financial interests may compromise professional actions or decisions.
- **Informed Consent:** Obtaining permission from participants in research, ensuring they understand the purpose and risks involved.
- **Ethical Screening:** A preliminary process to evaluate whether a research project might require a full ethical review.
- **Ethical Review:** A formal process of evaluating research to ensure it meets ethical standards, especially for sensitive topics.
- **Risk Register:** A tool used to identify, assess, and manage risks throughout a research project.
- **Data Protection:** Safeguarding personal information to comply with laws like GDPR, ensuring privacy and confidentiality.
- **Vulnerable Populations:** Groups such as children or adults at risk who require special considerations in research to protect their well-being.
- **Collaborative Agreement:** A formal contract between parties involved in research, outlining roles, responsibilities, and intellectual property rights.
- **Open Access:** Making research outputs freely available to the public unless there are safety or commercial reasons to restrict access.
- **Senior Responsible Officer (SRO):** A designated individual accountable for the overall success and ethical conduct of a research project.
- **Concordat to Support Research Integrity:** A UK-based policy framework that sets standards for research integrity, including transparency and accountability.
- **Secure and Sensitive Research:** Research activities that involve high-risk locations, sensitive personal data, or vulnerable populations, requiring special ethical considerations.

- **Six R's Indigenous Framework:** A set of principles (Respect, Representation, Relevance, Responsibility, Reciprocity, and Relationships) guiding research involving Indigenous peoples.
- **Free Prior and Informed Consent (FPIC):** A legal right of Indigenous peoples to give or withhold consent for projects that affect their land, resources, and community.
- The **International Aid Transparency Initiative (IATI)** is a global standard that enhances transparency and accountability in international aid. IATI provides a framework for publishing detailed accessible data on development and humanitarian spending.

Reference to related Documents, Policies, Procedures, Forms, Checklists, Templates, Guidelines and other resources

- An Introduction to the UNESCO Recommendation on Open Science (2022)
- EUNIC Fair Collaboration in Cultural Relations (2021)
- Jigsaw Developing a language policy for research in LMICs (2023)
- Forum for Education Research in/for/by Africa (2022)
- Peace Direct Transforming Partnerships in International Cooperation (2023)
- ACU Equitable Research Partnerships Toolkit
- British Council and Human Nature Aram Bekelala Community Engagement Guide (2024)
- Corona Insights Diversity, Equity and Inclusion in Quantitative Data (2024)
- UNESCO Ethics of Artificial Intelligence
- The Research Society AI and Ethical Guidelines in Research Practice (2023)
- Stabilisation Unit - Conflict Sensitivity Tools and Guidance (2016)
- Food and Agriculture Organisation of the United Nations - Free, Prior and Informed Consent (FPIC)
- LSE Research Ethics Committee Payments and Benefits to research participants (v5 2022)
- Ethical Research Involving Children Guidelines
- 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.)

Document History

Date (month/year)	Version	Name and post	Comments and/or changes made
11/2024	V1	Reece Waldron, Networks and Operations lead	Full revision including new amendments and new chapters included. ESIA and ICC review conducted.