



Procedure for Approval and Registration of Sensitive Research Projects

Rev	Date	Purpose of Issue/Description of Change	Equality Impact Assessment Completed
1.	11 th May 2016	Initial Issue	17 th June, 2016
2.	3 rd July 2017	Reviewed and reapproved	
3.	17 th October 2017	Minor amendments	

Policy Officer	Senior Responsible Officer	Approved By	Date
Head of Compliance	University Secretary	University Ethics Committee	3 rd July 2017

This Policy will be reviewed in 3 years

1. Introduction

This document sets out the approval and registration process for sensitive research projects undertaken by members of staff and postgraduate students¹ at Bangor University.

Bangor University supports its researchers in undertaking valid research using sensitive material. As part of this support it recognises its responsibility to ensure that researchers are protected from a misinterpretation of intent by authorities which may lead to legal sanctions. It is therefore essential that the University is aware of such research, and authorises it through the appropriate ethical processes, before the research commences, thereby allowing the University to demonstrate that it is aware of the project and that it has been through the appropriate review process.

2. Definition

Bangor University's definition of sensitive research projects will include, but is not limited to:-

1. Research which the University and / or the funder deems sensitive, e.g.
 - a. Materials covered by the Official Secrets Act 1989, the Terrorism Act 2006 and the Counter-terrorism and Security Act 2015;
 - b. Some materials accessed and used for projects commissioned by the British Military²;
 - c. Research projects requiring researchers to obtain specific security clearances;
2. Research which may include a breach of criminal legislation, accessing illegal or prohibited materials, and / or interviewing individuals who have/ or may be considering committing a crime e.g.:
 - d. Researchers undertaking criminological research, which may require accessing illegal materials or interviewing individuals who have / or may be considering committing a crime.
 - e. Materials covered by the Criminal Justice and Immigration Act 2008 and the Protection of Children Act 1978 including pornography and images of child abuse

It is recognised that other research material, not mentioned above, may also be regarded as sensitive. If in any doubt, a researcher should contact the chair of the relevant Academic Ethics Committee for further advice and guidance.

3. Ethical Approval Process for Sensitive Research

- [a] In accordance with Section 5 of the University's Research Ethics Policy all research involving human participants which involves more than a minimal risk should be reviewed by an appropriate Academic Ethics Committee (AEC). The research outlined in Section 2 above

¹ It is only in exceptional circumstances (e.g. valid research into criminal behaviour, terrorism etc.) that the University would allow undergraduate sensitive research projects to be undertaken. This decision would be made by the Sensitive Research Approval Group.

² Whether these projects come under the scope of these Procedures or not should be assessed on a case by case basis by the Chair of the relevant Academic Research Ethics Committee

would normally be considered as involving more than minimal risk and, consequently, would require submission to the relevant AEC in the first instance.

- [b] As defined in Section 4.4 of the University's Research Ethics Policy research to be undertaken outside the UK or involving partners from outside the UK carries an additional level of responsibility and scrutiny and researchers should ensure that they have considered fully any legal requirements and those of any relevant professional bodies prior to submission to the relevant AEC. Approval for research undertaken at an overseas institution should also be sought from the relevant committee at the host institution (where possible).
- [c] Where Bangor University is a contributor to a project, or where researchers from another institution or organisation wish to collect research data which falls into the definition in Section 2 above ethical approval from the other institution(s) or organisation(s) will normally be acceptable as proof that a particular project has been properly reviewed and approval granted. However, notice of the ethical approval, along with the research protocol, should be forwarded to the Chair of the relevant Academic Ethics Committee who may choose to refer the proposal to the Sensitive Research Approval Group.
- [d] Where the Chair of the relevant AEC considers that the research proposal falls into one of the categories outlined in Section 2 above, or where there is any uncertainty as to its sensitivity, they should contact the University's Head of Compliance as soon as possible and should include the application / research proposal submitted by the researcher to the AEC.
- [e] The Head of Compliance will then convene a meeting of the Sensitive Research Approval Group to consider the research. The Group's membership will be as follows:

Core Group

University Secretary (Chair)
Head of Compliance

In addition there should be representation from amongst the Chairs of University AECs, with due consideration given to the nature of the research under scrutiny. Where a particularly sensitive or complex proposal is being considered the Chair of the Sensitive Research Approval Group is also at liberty to co-opt relevant specialists either from within the University or from external agencies to advise and inform the decision making process. The researcher and their supervisor may also be asked to attend.

The terms of reference for the Sensitive Research Approval Group are included in Appendix A below.

- [f] The outcome of the meeting should be notified to the researcher and the supervisor by the Head of Compliance. The Chair of the relevant Ethics Committee and the relevant Head of School will also be informed.

The Director of Communications will also receive a list of sensitive research projects approved.

[g] Where a researcher is unhappy with the decision of the Sensitive Research Approval Group an appeal can be made to the Chair of the University Ethics Committee, who will convene a group to consider the appeal, including at least one lay member from the University Ethics Committee

4. Registration Process for Sensitive Research

Once a research proposal has been granted ethical approval by the Sensitive Research Approval Group the Head of Compliance will register the research proposal on the Sensitive Research Database which is held on a secure area of the University network.

Research material falling under the requirements of this Procedure and which is therefore deemed to be sensitive material should not, under any circumstances, be stored on the researcher's personal computer, or on unsecured areas of the University's networked drives (M/U). Storing information in designated secure areas of the network ensures that the University is aware of the research project should there be any external queries, and also guards against misinterpretation of intent by authorities which may lead to legal sanctions. . The IT Support Centre can assist in creating secured folders and allocating access rights to them. If a Researcher needs to grant access to these to a colleague from outside the University then they should be allocated a Bangor username under the Access to Services provision which can be arranged through Human Resources.

Researchers who follow the Ethical Approval Process for Sensitive Research outlined in Section 3 above will, as part of this process, be required to contact IT Services in order to arrange the set-up of an appropriate secure area, with clearly defined access arrangements, for the storage of this material. All physical data e.g. reports/manuals/consent forms/questionnaires etc. should be scanned and uploaded to the secure project drive, with hard copies subsequently securely destroyed.

The Head of Compliance and the University Secretary will have oversight of declared use of security sensitive research material. The purpose of this oversight is to allow a prompt response to internal and external enquiries relating to declared use of security sensitive material. The Head of Compliance will be aware of the names of the researchers who have information logged in a secure area of the network, and will be aware of the metadata (e.g. titles) for documents that are stored in the researcher's secure project drive, but not the content of the document themselves. This oversight will offer protection for researchers, who declare the use of security sensitive research material, as it ensures that the research material is kept secure and at arm's length from external intrusion (unless access is required for legal reasons), in return for openness on the part of the researchers about their use of security sensitive material.

5. Procedure for Members of Staff / External Agencies Requiring Confirmation of Valid University Sensitive Research Projects

The University recognises its responsibility to ensure that researchers are protected from a misinterpretation of intent by authorities which may lead to legal sanctions. Members of staff, the police and / or other external agencies may wish to contact the University to enquire whether a particular individual is undertaking valid research. This enquiry should be directed to the Head of

Compliance in the first instance, who will undertake checks to establish whether the discovery of / concerns about such material is linked to a registered research project.

6. Good practice guidelines

[a] Using a university profile when visiting sensitive websites

Researchers should be aware that visits to sensitive websites (even from open access sites) may be subject to monitoring by the police / other authorities and, if discovered, could prompt a police investigation. It is therefore required that, when undertaking such research, a university IP address is used to access sites in order to ensure that any enquiries about such activities come to the institution in the first instance.

[b] Reporting

If a member of staff or a student becomes aware of a research project which, in their opinion, needs oversight as outlined in this Procedure they are encouraged to contact the Chair of the appropriate Academic Ethics Committee or the Head of Compliance.

[c] Compliance and Monitoring

All members of the University (both staff and students) are directly responsible and liable for the information they access and handle as part of their research. Staff and students are bound to abide by the University's *Acceptable Use Regulations*.

A failure to comply with the requirements of this policy in relation to research defined in Section 2 above must be reported to the Head of Compliance, Planning and Governance Office in the first instance. Disciplinary action may be considered and the research data collected may become invalid.

Appendix A

Sensitive Research Approval Group

Membership

Core Group

University Secretary (Chair)
Head of Compliance

In addition there should be representation from amongst the Chairs of University AECs, with due consideration given to the nature of the research under scrutiny.

Where a particularly sensitive or complex proposal is being considered the Chair of the Sensitive Research Approval Group is also at liberty to co-opt relevant specialists either from within the University or from external agencies to advise and inform the decision making process. The researcher and their supervisor may also be asked to attend.

Terms of Reference

1. The Group shall keep under review and make recommendations on the *Procedure for the Approval and Registration of Sensitive Research Projects*.
2. The Group shall have responsibility for making decisions on applications for ethical approval of research which falls under the criteria outlined in the *Procedure for the Approval and Registration of Sensitive Research Projects*.
3. Where necessary the Group will:
 - a) Obtain advice and guidance from members of staff outside the Group, and co-opt relevant specialists from within the University or from external organisations or agencies where required;
 - b) Provide further guidance to researchers where it is considered the documentation submitted does not have the sufficient detail necessary for the Group to make an informed decision;
 - c) Ensure that, as far as it is reasonably practicable, risks to the researcher, the participants or the University are considered, assessed and where possible minimised;
4. The Group will report on the nature of the research considered to the University Ethics Committee at its next meeting.