#  British Council Research and Evaluation Ethics policy

**About Research and Evaluation at the British Council**

The British Council supports, commissions and contracts research both internally and through external strategic or tendered partnerships. Our research strategy covers themes and geographical areas of contemporary importance to ourselves and our UK and global partners and aims to provide evidence and insight to inform our programme activity and policy dialogues, as well as context for our understanding of the global landscapes in which we work.

Research[[1]](#footnote-1) occurs across the British Council in a variety of ways and for a variety of purposes, from market research to thought leadership. Research can inform us about trends and developments across our areas of work as well as about the effectiveness of our programmes through evaluations and impact reports, and our research can be generated either for internal purposes or for sharing with diverse external audiences. Although the formulation, participants, and conduct of the research will be different depending on its purpose, all research and evaluation projects will adhere to the same set of organisational ethics principles and be in line with this Ethics Policy for the global organisation.

The executive summary, below, is to be included in the procurement terms of reference for all funded and gratis research and projects and evaluations offered for tender, and in the contracts with all research partners successful in these bids or in gaining funding for research and evaluation purposes from the British Council.

## Executive Summary

## a. Remit of this Policy

This Policy has been prepared in line with the Concordat to support Research Integrity[[2]](#endnote-1) and the RCUK Code of Conduct[[3]](#endnote-2) and has been drafted with consideration to the DfID review of Research and Evaluation ethics. It is held in line with the Human Rights Act and the Universal Declaration of Human Rights[[4]](#endnote-3), particularly article 53 ‘*Declaration on the Right and Responsibility of Individuals, Groups and Organs of Society to Promote and Protect Universally Recognized Human Rights and Fundamental Freedoms’.*

This policy is to be agreed to by those we contract for research and evaluation purposes. Clarification about what research the British Council does not fund and the parameters in this regard should be sought from the secretary of the Research Board.

This Policy should be held in alignment to the British Council’s Code of Conduct, Global Policy framework[[5]](#endnote-4) - with particular reference to the Child Protection policy, Information Security and Management policy, the Equality policy, and their respective processes.

The British Council may conduct research in difficult or high risk operating environments as it aligns to the geographies in which we work and the ODA principles of our funding, and where research correlates to the key subjects of our concern (security/stability). These factors may entail a risk to researchers, participants and others (e.g. potentially stigmatised or marginalised groups) as a result of potential participation, knowledge exchange, impact and dissemination activity, and information relating to all these factors should be considered as part of the ethical information submitted in the research proposal by the managing department , country office or strategic business unit.

## b. Requirements for all research projects and evaluations:

* In line with this policy, **every research project** must consider as part of the written brief for the researcher(s) the ethical implications of the research and demonstrate such in their ethical paperwork. The detail required will vary according to the subject of the research project, but may include aspects of informed consent and participant anonymity and security, legal obligations, local contextual considerations and reactions to the research.
* **All projects involving participants** – whether connected to British Council programmes or not – must complete
	+ a participant information and consent form unless it is deemed unsafe or unethical for them to do so (see *research in high risk contexts).*
	+ a fieldwork risk assessment form.
* **All policy requirements, costs and capacity** for assuring ethics must be worked into research or programme plans and into contract terms where the research or evaluation is part of an FCR contract. Please allow for project any costs for the time and expense of colleagues to review the ethics in this way.

## c. Do no harm

Do no harm[[6]](#endnote-5) is a term and principle which considers a number of ways in which donors might inadvertently ‘do harm’ in situations of conflict and fragility. It examines some of the ‘do no harm’ dilemmas facing donors, and looks at programming approaches that have been used to avoid harm and contribute to peace and stability.[[7]](#endnote-6)

## British Council global research and evaluation principles:

*To be observed and adhered to by all those managing commissioned researchers, conducting research or disseminating or publishing research in the British Council.*

The British Council Research principles are aligned to and reflect the *Concordat to Support Research Integrity*:[[8]](#endnote-7)

1) Maintaining the highest standards of rigour and integrity in all aspects of research;

2) The dignity, rights, safety and wellbeing of participants must be a primary consideration in any research study and, as such, are integral to the British Council’s research ethics review process. All participants must be warned in advance about any potential risks of harm:

Risk of harm may include: physical or mental harm caused by the research practice or contents of the research methods; risk of retaliation due to exposed identity in a research project; risk of information sharing and data protection; risk of exposure to adult subjects (in the case of youth participants); reputational risk.

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

Particular sensitivity to safeguarding and consent should be applied if any or a combination of the following apply in the research project: working with young people and in schools, working with sensitive groups (religious/political), risk involved to participant identity in quoting interviews, use of photographs or visual identification such as film.

3) Ensuring that research is conducted according to appropriate legal and professional frameworks, obligations and standards, and that the potential risks (including physical, psychological, professional, reputational and legal risks) have been considered and how those will be mitigated.

4) Supporting a research environment that is underpinned by a culture of integrity and based on good governance, best practice and support for the development of researchers;

5) Using transparent, robust and fair processes to deal with allegations of research misconduct should they arise;

6) Working together to strengthen the integrity of research and to reviewing progress regularly and openly.

7) If the research is undertaken with an appropriate partner, consultant, or organisation, that appropriate process and principles are followed to form a partnership or procurement process with this organisation.

8) The research practice, the collection and management of participant and partner information, and publication adhere to the Data Protection Act and the following regulations:

* 1. Any conflict of interest is declared;
	2. Research, data collection and management adheres to the legal and regulatory frameworks, including the Data Protection Act;
	3. Data is collected through open and transparent means and consent is obtained even when accessing secondary data. This includes data gained through twitter campaigns, social media platforms, from mobile devices and in email communications.
		1. Where media data is collected for research or evaluation purposes, this must be stated in the information about the campaign, programme material or in an information sheet, and participants offered the chance for their data to be excluded;
		2. Where data already collected or to be captured deliberately or otherwise from media, social media or electronic devices is requested for the purposes of research or evaluation, written consent must be gained from those participants and full disclosure of the purposes of that research project provided.
		3. Data gathered via social media for purposes greater than analysis of reach or engagement numbers, which may reveal users twitter or full identity or be recognisable sentiments, should be **avoided** at this point. The British Council is reviewing its digital strategy and position and has sought guidance from the Academy of Social Sciences’ Social Media Ethics in Research position[[9]](#endnote-8) but is not currently in a position as yet to encrypt or protect social media data which could expose participants’ identities.
	4. All sources of ideas, data, information, text or other intellectual property are comprehensively referenced, including previous British Council reports and digital sources including social media;
	5. The input of authors and other contributors to the research is acknowledged to ensure fairness, transparency and accountability;
	6. All participants (surveyed or interviewed) are briefed on the purpose of the report, have the right to remain anonymous, and receive the research findings;
	7. The research report, the data set, and the methodical notes are appropriately archived.

9) The research purpose and audiences are clearly stated, and the research question is formed in response to a problem, knowledge gap or information need.

In addition that:

1. It is aligned to British Council strategy, demonstrates value to the UK, informs a priority area, and is of use to the country/s of origin
2. The research outputs are actionable and can be learned from
3. Work is not duplicated, new knowledge or evidence is created
4. A distinction is made between research, market insight reports, and monitoring and evaluation.

10) The research is of high quality and is reviewed before publication to consider the risks and implications, and a detailed M&E and communications plan are developed.

The research cycle to entail (where appropriate):

1. As part of the question forming, a literature review is conducted
2. Where relevant, the research should have a clear testable hypothesis/es
3. Finalised reports are properly peer reviewed before publication and made available as models to others
4. 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 (see section on digital and social media use in research)[[10]](#endnote-9)
5. Data is represented in its entirety, any misinterpretation is avoided.

11) The research report is disseminated to relevant stakeholders

1. The communication of the research should be considered in the overall planning at the outset of the project
2. Research reports funded by the FCO grant should be made freely available
3. Research funded through other sources should be made available where possible (acknowledging that this may be on a paid-for basis)
4. Research should be disseminated to appropriate audiences, including internal audiences, to ensure maximum impact and use of the research.

12) The research skills of British Council staff are developed throughout

1. The research skills of British Council staff are developed and supported throughout a research project,
2. All British Council commissioned or conducted research should aim to involve British Council staff at some level in order to build the capacity of staff and underpin our ambition to be an evidence-based organisation.

## When to use this policy and how to assure a research project or evaluation

All research projects and evaluations, and research or evaluation components of programmes in development or delivery should adhere to the principles set out in this policy.

To that end, all staff commencing or involved in research activity under any of the categories below (see: *Implications and Applications*) must assess the level of ethical risk of their project recognising there are specific ethical concerns attached to research and evaluation activity before the project starts.

## Who is responsible for assessing and mitigating ethical risk and review?

* **Research conducted by British Council staff:** the British Council staff member carrying out the research – in the UK or in country.
* **Research commissioned by the British Council:** the Researcher or Research Organisation contracted or commissioned to carry out the research – in the UK or in country; checked by the British Council staff member who has commissioned the research (see below).
* **Fieldwork or in country studies:** the researcher or research organisation is responsible for assessing ethical concerns and assuring ethical research conduct of all third parties commissioned to carry out fieldwork in country; the researcher should be provided with a contact from the British Council country office if the British Council staff member managing the researcher is not based in the country in question.
* **Research funded by the British Council in scholarship (i.e Newton):** the researcher or research organisation in receivership of the scholarship or fund.
* **Research which is high risk or sensitive:** whether carried out by the British Council or commissioned with a partner, responsibility for following procedure to assure ethical conduct for high risk or sensitive research (see criteria below) is held jointly by the British Council and the commissioning partner, if contracted.
	+ **Commissioning partner undertakes the ethical assessment of the project and undertakes to monitor and mitigate ethical risks during the research practice,** reporting regularly to the Project Manager and to an in country contact (if not in the same country). Documentation proving ethical assessment procedure and the project’s compliance must be submitted and reviewed prior to project completion.
	+ **The British Council project manager** must review the ethical assessment of the project with the lead researcher and British Council country office (if fieldwork is conducted in country) and
		- Set regular mandatory meeting dates for ethical risk review during the project;
		- Seek the advice of the British Council Research board secretary.
		- Refer any high level project risks to the SRO of the project for their decision to mitigate or proceed if in delivery.

## What level of ethical review does my project need?

Not all research projects carry the same level of ethical risk and the British Council appreciates that many projects will not require action. However, all research projects must operate ‘check and go’ to determine any actions needed:

**Low risk projects**

The research project is classed as low risk if it **does not** involve:

* direct contact or primary research with human/animal participants e.g if it is a desk based review with consideration for any anonymity required of sources
* access to identifiable personal data for living individuals not already in the public domain
* increased danger of physical or psychological harm[[11]](#endnote-10) for researcher(s) or subject(s) as a result of the research subject, methodology, information use or publication
* research into high risk or sensitive geographies.

**ACTION:**

* In the case of research and evaluation projects with low ethical risk the staff member managing the research project should tolerate the risk and no further review is required unless the nature of the research subject or practice should change. The same action applies if the project is being carried out by a commissioned research partner.

**Medium risk projects:**

* The research project **does** involve contact with or primary research or fieldwork undertaken with human/animal participants but **does not** involve any of the other conditions detailed the **Secure or Sensitive criteria.**

**ACTION:**

* All research is carried out in accordance with this policy and within the bounds of those cited in it which support it (see Executive Summary).
* All research staff and in country staff, including any third parties, support staff involved in research activity and partners are briefed about the research project in confidence including the do no harm principles (see ‘Do No Harm’ above).
* All research projects gathering primary or secondary information from participants inform and gain the consent of participants to take part in the study, and submit participant information and consent forms, and a fieldwork risk assessment form, to the secretary of the British Council research board.
* Staff carrying out research must respect the participant’s right to withdraw from the research at any time without adverse consequences to the participant and with ongoing protection of participant information.
* All data from living participants gathered must be anonymised at the point of collection and stored under encryption in a secure online system (see data protection policy for more info).
* Researchers must report any concerns about breaches to the ethical policy as per their research organisation’s ethics procedure to the staff responsible for the project and the secretary of the British Council Research Board.

## Transferring risk in projects with research partners

If the research or evaluation is commissioned by the British Council and conducted by an external partner individual or organisation, the assurance of research and evaluation ethics and the monitoring and mitigation of risk procedure is transferred to the research individual or organisation as they are closest to the research process and participants.

The researcher or research organisation must:

1. Supply a written or soft copy of their ethics policy and procedure to the British Council project manager, and evidence that they have assessed the research project or evaluation in question against these procedures. This documentation must be stored securely.
2. The project manager who is contracting the researcher or organisation should check that the ethics procedure of the organisation complies with the
3. Highlight any high level risks to the British Council Project Manager who is their main contact – who will refer to the SRO or British Council risk team if necessary.
4. Hold insurance compliant with British Council partnership standards.

## Secure and sensitive projects

Projects must be submitted for full ethical review to the secretary of the Research Board if they are found to be classified as ‘secure and sensitive’ because they involve one or more of the criteria below. The secretary will seek advice and review services from the RC Research Integrity Office to treat the ethical risks:

**Secure and sensitive programmes include research practice or information which:**

* Is conducted or involves fieldwork in geographically high-risk locations
* 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
* Allows access to identifiable personal data for living individuals (avoidable: see medium risk)
* Is commissioned under an EU security call
* Involves the acquisition of security clearances
* Is commissioned by the military or an intelligence agency or body
* Concerns threat from or study of terrorist or extreme groups
* Concerns participants who are children under 18 or subjects who may unable to give fully informed consent or adults unable to give fully informed consent
* Concerns prisoners or others in custodial care (e.g. young offenders)
* Concerns animals or human physical contact
* Scores high risk on the British Council’s project risk register (whole programme or for the research component alone)
* Is subject to another risk or concern identified by the staff member or country office responsible for managing the research.

**ACTION:**

If the research projects ticks any or several of the criteria above, the staff member carrying out or commissioning the research must:

* Complete a research and evaluation risk assessment form and determine mitigation actions;
* Discuss the resulting assessment with their senior line manager, the SRO of the project if in delivery, and any research partners involved in the research to approve or escalate the actions;
* Notify the secretary of the Research Board about the project and seek advice from the research board secretary about how to proceed with the project.

## Implications and Applications of this Ethics policy for those commissioning and managing research in the British Council:

* All contracted or commissioned research organisations must have an operational policy and procedure for assuring ethical conduct in research practice and publication, and submit this to the British Council upon application as an appendix. This must be approved for the research contract to be awarded and reviewed prior to the research project commencing.
* The organisation’s policy must align with the Research principles of the British Council (above) and the procedures for upholding it must ensure that the principles can be upheld – particularly in terms of ensuring informed consent of participants, data protection, and conducting research in sensitive contexts. A written account with specific detail of the organisation’s ethical procedures must be submitted with the ethics policy.
* Where the research project or participant sample is deemed to be high risk or sensitive, certain components of the research to be reviewed by the British Council staff responsible for managing the project:

Any participant survey or questionnaire to be reviewed prior to use, and a paragraph on confidentiality included (see appendix a: preparing a participant information form)

Participant information and consent forms to be reviewed, and complete set of responses spot checked;

Collected data to be subject to a spot check & QA.

## Reporting ethical breach:

Researchers must report any concerns about breaches to the ethical policy as per their research organisation’s ethics procedure and to the British Council staff responsible for the research project or evaluation who will be a) a country office contact if the researcher is engaged in fieldwork; b) the project manager or commissioner if in the same country.

## For those managing research elements or evaluations of programmes in Delivery:

* As with the above section a) the contracted research organisation or entity to have a policy and procedure for ensuring participant information and consent, and a copy of the ethics assurance to be obtained prior to the research commencing.
* The project manager must complete a research risk assessment and register all research ethics risks determined in line with this policy alongside other project risks on the risk register at the start of the project, and update this throughout the project.
* Participants should be provided with a copy of the final report and data, unless it is deemed a risk to their safety to transmit this information – or a risk to others.
* 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 that all participants are informed if and for how long their data will be archived for. The British Council requires this in alignment with the European Social Research Council’s (ESRC’s) Research Data Policy[[12]](#endnote-11).
* Should a research strand be added to or become part of an existing British Council Programme or Project later into the project design, consent of participants must still be obtained before any research activity or data collection commences, or any participant data is used. Researchers or the Research team should obtain this consent with the appropriate Programme or Project Manager, where appropriate with guidance from the Research Governance Board.

## For those communicating or publishing research:

***This includes use of research in any partially or fully publically visible or accessible medium.***

* If the research has been commissioned or conducted by the British Council (see a and b, above) a light content review of the final publication and data should be carried out by staff communicating or publishing research to ensure it adheres to ethical principles and does not expose research subjects or the organisation to risk of harm; as ethical assessment of the research project should be carried out before, and monitored throughout, the research practice.
* If the research has been obtained by the British Council from a partner organisation or external source for publication or dissemination in the name of the British Council but has not been commissioned by the British Council, or carried out by an individual in the British Council without ethical consent, the ethical risk should be registered on the risk register and the report submitted to the secretary of the research board for review prior to publication.Research and evaluations carried out by partner organisations or external parties which is clearly cited as being the views of that organisation, author, or party, and not the British Council’s own, is not required for review.
* In the case of all research and evaluation projects, the final report and its findings will be shared with all participants unless it is deemed a risk to their security or to British Council’s staff to do so.

## Raising a concern of breach of ethics policy during monitoring of a research or evaluation project:

If you have an ethical concern, or become aware of a breach of this ethics policy occurring in the course of research under any of the sections a) to d) above, you should follow the procedure outlined in Appendix 1of the British Council Speaking Up Policy[[13]](#endnote-12) except if the following applies:

* If your concern relates to a Secure or Sensitive research project, staff should raise their concern first with their line manager or SRO, who should escalate it *to the secretary of the Research Board*. Researchers commissioned or contracted by the British Council should highlight the risk as per their institution’s ethics and to the British Council staff responsible for the research project or evaluation. If the concern relates to child participants (under the age of 18) the Child Protection policy[[14]](#endnote-13) should be followed.

## Accountability:

The British Council commissions, conducts and funds research. Ethical principles are set by the British Council and upheld by the British Council’s team managing the project and by the research organisation’s own procedure who is conducting the research. Where the research is only funded by the British Council as part of a competition – advice must be sought to clarify what research the British Council does and does not fund.

1. In the event that a researcher commissioned and contracted by the British Council is found to have acted in breach of this ethics policy and principles, they or their institution are accountable and liable to any legal or other consequences – according to their institution or company’s own policy.
2. Legal implications for colleagues involved in research? Is the organisation or individual accountable?
3. The British Council as an organisation will be accountable where it is an institutional policy breach by staff conducting research themselves so long as the research project met ethical standards when first initiated; the individual is only held accountable where they are found to have breached the organisational code of conduct.
4. Review of how the ethics principles have been assured for participants and for their data and findings, should be built into any evaluation of the project, if an evaluation is relevant.

## Review process for this Ethics Policy

This ethics policy will be reviewed annually by the British Council Research board and the contact for this policy is Emily Morrison, Research Project Manager.

1. Frascati Manual definition of Research can be found here: <http://www.keepeek.com/Digital-Asset-Management/oecd/science-and-technology/frascati-manual-2002_9789264199040-en#page31> [↑](#footnote-ref-1)
2. UK Research Integrity Office, *Concordat to Support Research Integrity, ‘*Devised by the UK Government, Universities UK, Research Councils UK, the National Institute for Health Research, the Wellcome Trust and other key stakeholders, it sets out five commitments that those engaged in research should make to help ensure that the highest standards of rigour and integrity are maintained. These key commitments apply to researchers, their employers and funding bodies alike’. <http://ukrio.org/our-work/the-concordat-to-support-research-integrity/> [↑](#endnote-ref-1)
3. Research Councils UK, *RCUK* Policy and Code of Conduct on the Governance of Good Research Conduct <http://www.rcuk.ac.uk/publications/researchers/grc/> [↑](#endnote-ref-2)
4. United Nations General Assembly, *Universal Declaration of Human Rights,* 1948, <http://www.un.org/en/universal-declaration-human-rights/index.html> [↑](#endnote-ref-3)
5. British Council Global Policy Framework, <http://intranet.britishcouncil.org/policies/Pages/Default.aspx> [↑](#endnote-ref-4)
6. Anderson, M, B, 1999, *Do no harm: How Aid can support peace – or war*

Also cited in DfID Briefing paper, 2010, *Working effectively in conflict-affected and fragile situations,*

[*http://www.gsdrc.org/docs/open/con77.pdf*](http://www.gsdrc.org/docs/open/con77.pdf) [↑](#endnote-ref-5)
7. Do No Harm Principles <http://www.gsdrc.org/docs/open/con77.pdf> [↑](#endnote-ref-6)
8. UK Research Integrity Office, *Concordat to Support Research Integrity,* <http://ukrio.org/our-work/the-concordat-to-support-research-integrity/>

Also hosted at <http://www.universitiesuk.ac.uk/highereducation/Documents/2012/TheConcordatToSupportResearchIntegrity.pdf> [↑](#endnote-ref-7)
9. Social media and ethics policy ESRC /ACSS. [↑](#endnote-ref-8)
10. See guidance from Universities UK on storage of sensitive research data and material <http://www.universitiesuk.ac.uk/highereducation/Documents/2012/OversightOfSecuritySensitiveResearchMaterial.pdf> [↑](#endnote-ref-9)
11. Do No Harm principles, <http://www.gsdrc.org/docs/open/con77.pdf> [↑](#endnote-ref-10)
12. Economic and Social Research Council, Research Data Policy, <http://www.esrc.ac.uk/funding/guidance-for-grant-holders/research-data-policy/> [↑](#endnote-ref-11)
13. Speaking Up Policy, accessed via the Global Policy Framework, <http://intranet.britishcouncil.org/policies/Pages/Default.aspx> [↑](#endnote-ref-12)
14. British Council Child Protection Policy, <http://intranet.britishcouncil.org/Site/ChildProtection/Pages/Default.aspx> [↑](#endnote-ref-13)