COLÁISTE CHEATHARLACH NAOMH PÁDRAIG
CARLOW COLLEGE ST. PATRICK'S

TITLE: ***RESEARCH ETHICS ADVISORY POLICY***

Version	6	**Date Approved**	18 September 2024
	Policy reviewed and revised by the Research Ethics Advisory Committee. The most significant change is that every final year research dissertation that deals with humans must be submitted through the Research Ethics Advisory Committee. There is the inclusion of a new section in the policy titled 'research with vulnerable groups', the inclusion of penalties for misconduct (appendix 10) and the inclusion of appendices 12 and 13; other appendices renumbered accordingly.	**Review Date**	18 September 2029 *or as required*
Approved By	Academic Council		
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Version Control		
Version No.	**Date Approved**	**Documented Changes**
5	8 September 2023	Policy reviewed and revised by the Research Ethics Advisory Committee. The most significant changes are the inclusion of a new section in the policy titled 'research with vulnerable groups', the inclusion of penalties for misconduct (appendix 10) and the inclusion of appendices 12 and 13.
4	20 September 2020	Appendix 1 was amended to focus exclusively on undergraduate research and Appendices 11, 12 and 13 were developed.
3	16 September 2019	The appendices were revised, namely: the process for applying to the Research Ethics Advisory Committee was clarified (Appendix 1); Ethics

		Checklist revised (Appendix 2) and Data Management Guidelines added (Appendix 3).
2	1 November 2017	Policy reviewed to include academic best practice in the area of research ethics, alignment with CCSP *Policy on Policies* and defined procedures / guidelines.
1	6 December 2011	Initial Issue

1. Purpose of Policy

Research is at the core of all teaching and learning in third-level institutions. Significantly, at the core of all research are the moral principles that govern a person's behaviour or the conducting of an activity. The purpose of this Policy is lay out guidelines and the processes for the college to provide independent, ethical review of all research proposals to be carried out by learners, staff and collaborative partners who are engaged in research activity that involves human and / or animal participants. All research involving humans and animals is now guided by legislation and individual disciplinary ethics and best practice policies such as (for oral history) OHA Principles and Best Practices and (for psychology) *The Ethical Principles of Psychologists and Code of Conduct* which is informed by Section 8.09 of the American Psychiatric Association (APA, 2010). The APA in turn informs and guides the *Code of Professional Ethics* of the Psychological Society of Ireland (PSI, 2019), the *British Psychological Society Code of Ethics and Conduct* (BPS, 2016), the Department of Health Service Executive (HSE, 2016), and the current *Guidelines for Ethical Conduct in the Care and Use of Animal*s (BPS, 2016) *European Research Code of Conduct* (2023). The European Research Council Ethics Guidelines also offer helpful advice. All research projects must comply with GDPR.

In addition to the above documents, the drafting of this Policy and associated procedures has been informed by the *National Statement on Ensuring Research Integrity in Ireland*, by the Sociological Association of Ireland's *Ethical Guidelines for Research* and by various Oral History Associations' *Statement on Ethics*.[1] SETU Carlow's *Ethics in Research Policy* (2021) has informed this document.

2. Definitions

Research Ethics are the guidelines that govern how research should be conducted and disseminated. The general principles relate to honesty, integrity, objectivity, informed consent, respect for the participants, best practice in managing research and conflict of interest and responsible publication.[2]

[1] See https://www.iua.ie/publications/view/national-policy-statement-on-ensuring-research-integrity-in-ireland/, https://www.sociology.ie/uploads/4/2/5/2/42525367/sai_ethical_guidelines.pdf and https://www.oralhistory.org/oha-statement-on-ethics/ or https://www.ohs.org.uk/advice/ethical-and-legal/.
[2] https://ec.europa.eu/research/participants/data/ref/fp7/89888/ethics-for-researchers_en.pdf

Vulnerable Groups / Individuals in research are categories of people who are not legally able to provide informed consent due to age or incompetence and include the following:

- Children (under 18);
- People who have a language difficulty;
- Persons who have an intellectual or mental impairment or neurological condition;
- Certain groups of elderly people (with physical or mental impairment);
- Persons who are incarcerated;
- People in dependent or unequal relationships (teacher/lecturer-student, therapist client, employees as participants);
- Other groups might also be included in this category depending on the nature and context of the research.

Research that involves vulnerable groups may require a proxy (parent, next of kin, carer, guardian or legal representative) to provide consent. The Carlow College guidelines for determining wither an individual falls into a vulnerable category is available on the 'Traffic Light' procedure (see pages 11 – 12).

Sensitive Topics can refer to a "sensitive" topic can refer to 'research which potentially poses a substantial threat to those who are or have been involved in it' Lee (1993:4).[3] Sensitive issues can include (but are not limited to) the following:

- Sexuality
- Illegal activities
- Experiences of Abuse/Exploitation
- Death and Grief
- Mental Health

Researchers need to assess and mitigate any threats or harms to the participants, and to themselves, when inquiring into potentially sensitive topics. The Carlow College guidelines for determining whether an individual is part of a vulnerable category is available on the 'Traffic Light' procedure (see pages 11 – 12).

Research can be defined as the systematic inquiry aimed at discovering, interpreting, and expanding knowledge or understanding of a particular subject. Research can be categorised as primary or secondary research.

Primary Research involves the collection of original data directly from the source. This can include experiments, surveys, interviews, observations, etc. It's tailored to the specific needs

[3] See: Lee, RM. (1993) Doing research on sensitive topics. London: Sage. The level of sensitivity of the topic may vary according to discipline.

of the researcher and offers first hand insights into the research question. Ethical issues with primary research can include;

- Informed consent
- Privacy and confidentiality
- Data accuracy
- Avoiding harm
- Bias and objectivity

Secondary Research involves the analysis and interpretation of existing data or information collected by others. This includes sources like books, articles, reports, databases, etc. Secondary research can provide a broader perspective on a topic and is often used to complement primary research. Ethical issues with secondary research can include:

- Plagiarism
- Selective reporting
- Misinterpretation
- Data ownership
- Conflict of interest

Vulnerable persons a person, other than a child who: is suffering from a disorder of the mind, whether as a result of mental illness or dementia; has an intellectual disability; is suffering from a physical impairment, whether as a result of injury, illness or age; or has a physical disability, which is of such a nature or degree as to restrict the capacity of the person to guard himself or herself against harm by another person, or that results in the person requiring assistance with the activities of daily living including dressing, eating, walking, washing and bathing. It may also include those who are institutionalised or those who belong to a minority group.

3. Scope of Policy

The REAC has responsibility for the review of all research proposals to be carried out by Carlow College's learners, staff and collaborative partners who are engaged in research activities that involve work with humans or animals. REAC recognises that researchers have ethical obligations that are both specific to their discipline / field as well as shared with other disciplines. REAC will endeavour to recognise these differences where appropriate.

It is the responsibility of dissertation supervisors to point out to undergraduate and postgraduate learners the *Procedure for Undergraduate and Taught MA Applications to the Research Ethics Advisor Committee* (Appendix 1). These guidelines must be adhered to by all learners during their research. REAC has developed two application processes that take account of research undertaken at different levels: (i) an application process for research

proposals undertaken across programmes at NFQ Level 8 and NFQ Level 9 (taught Masters), and (ii) an application process for research proposals undertaken by learners taking programmes at NFQ Level 9 (by research and Dissertation), and at NFQ Level 10. This also includes research proposals from staff, postdoctoral researchers and from researchers in collaborative projects with Carlow College.

External researchers or staff who wish to conduct research involving staff or learners from Carlow College must have ethical approval from their own institution which is recognised by international bodies and which matches the guidelines of REAC at Carlow College.

While taught modules at BA and MA level where interview skills are used are not subject to the same REAC application and approval process, it is the responsibility of the module coordinator to ensure students are trained in research integrity, data management, ethical and professional practice, and that the work ensuing conforms to best disciplinary practice and ethical standards.

4. Policy Statement

REAC takes the view that ethical conduct in research is a shared responsibility. There is, therefore, an onus on all individuals involved in research projects in Carlow College to familiarise themselves with the appropriate ethical guidelines, policies and procedures laid down by their disciplinary and / or professional body and to ensure that these are followed. Particular attention must be paid to any research involving human and/or animal participants.

As such, it is mandatory that at undergraduate and postgraduate level, learners will address the ethical implications of their research with human / animal participants as part of the written research proposal submitted to their dissertation supervisor (see Appendices 1 and 2).

The purpose of the Research Ethics Approval Committee is to:

1. Provide a safeguard for the protection of the dignity and welfare of humans and/or animals that are involved in research projects conducted by Carlow College learners, staff and collaborators. This committee will do this by (i) exercising oversight of the *Ethics Checklist for Learners* process for research projects carried out across programmes at NFQ Level 8 and NFQ Level 9 (taught Masters), (ii) reviewing and approval of research proposals from learners undertaking programmes of research leading to awards at NFQ Level 9 (by research and dissertation) and NFQ Level 10 programmes, and by (iii) reviewing and approval of research proposals from staff, post-doctoral researchers and from researchers collaborating in Carlow College research projects;
2. Promote the systematic and effective development of ethical research in Carlow College;
3. Guide and support learners and dissertation supervisors in matters related to ethical research;
4. Ensure REAC remains effective and responsive to user needs;

5. Maintain a register of past and present research projects within the College that involve human and / or animal participation, as well as a record of the decisions and instructions made by REAC in relation to those projects.

4.1: Research with Vulnerable Groups

Research concerned with the study of individuals under the age of eighteen should always be guided by Children First: National Guidance for the Protection and Welfare of Children (2017) which provides national guidance for the protection and welfare of children in Ireland. To this effect, ll research involved in the study of individuals, whether under the age of eighteen years, or adults deemed as vulnerable (i.e., members of a self-help group, prison populations, intellectually challenged persons) should follow the Garda Vetting Policy of Carlow College. See Appendix 1 for Process for Approval of Undergraduate and Taught Masters Research. Please note that under Appendix 1, no student may conduct research that falls within the Red Light Category. In this instance, an application for Garda Vetting does not apply. In relation to other researcher projects (e.g. research conducted by staff and Level 9 and 10 researchers are required to undergo separate Garda Vetting). It is the duty of the REAC chairs to notify researchers in this category of requirement.

It is also important that all researchers make themselves aware of the Data Protection Legislation and the *Data Protection Policy* at Carlow College.

The Research Ethics Advisory Committee (REAC) of Carlow College is a committee concerned with the protection of humans and animals involved in research projects designed and carried out by external researchers, staff and / or learners of Carlow College. This may include surveys, questionnaires, interviews, and focus groups to name but a few. It is mandatory that all research conducted in Carlow College or by Carlow College staff, external researchers, or learners that involve humans or animals adheres to the approval process of REAC.

5. Roles and Responsibilities

The following section outlines the responsibilities of the Chair of REAC, the Dissertation/Research Supervisor, members of the REAC Committee, and Researchers.

5.1 Responsibilities of the Chair of REAC

- *The Chair of REAC* is responsible for distributing the relevant documents to all dissertation supervisors and providing workshops to make supervisors familiar with the process.
- They are further responsible for issuing reminder emails to dissertation supervisors for the signing and collection of completed *Ethics Checklists* and the submission of the checklist to REAC where this is relevant (See Appendix 1).
- The Chair of REAC will ensure that external researchers and/or staff conducting studies at Carlow College have submitted documentation stating they have obtained ethical approval from their institution. If further documentation or clarification is required,

the Chair is responsible for obtaining same prior to the commencement of any study at Carlow College. The Chair is responsible for communicating decision about the conduct of research within Carlow College to external researchers.

- The Chair of REAC is responsible for compiling an annual report of REAC activities for Academic Council.

5.2 Responsibilities of the Dissertation Supervisor

- To ensure the research data are adequate and safeguards put in place to protect the student / researcher, the participants of research.
- To promote compliance with ethical protocols and Data Protection laws.
- To check that learners engaged in primary research are administered a copy of the Research Ethics Advisory Policy.
- To advise learners on the viability of their research in the first instance.
- To assist students doing research at undergraduate level or taught Masters level to fill in the Ethics Checklist for Learners form and to co-sign it.
- Keeping students informed of communications between REAC and the supervisor regarding any issues that may arise.
- To submit a list of students who have received the 'Green, Orange and Red Lights' (Appendix 13) to the Chair of REAC.
- Where a student is exempt from submission to REAC (see Appendix 1), supervisors should ensure that the learner is aware that they must include the relevant documentation, as well as the *Ethics Checklist* into the final Dissertation.
- Where a student is not exempt from submission to REAC (see Appendix 1), supervisors to:
    - Check that the learner is aware that they must include the completed Ethics Checklist, associated documents and proposal summary to the Chair of REAC and include it in the final Dissertation.
    - Check that the researcher submits the research proposal to the REAC (where necessary).
    - Check that researchers use the templates provided for obtaining Participant Consent (Appendix 5) and / or Gatekeeper / Agency Consent (Appendix 7).

5.3 Responsibilities of REAC Members

- *REAC Members* are responsible for developing safeguards to protect the learner / researcher, the participants of research and research data and ensuring they are fit for this function.

- REAC Members will also promote compliance with ethical protocols and Data Protection laws.
- Members of REAC are responsible for their attendance at four meetings annually and the decision-making that may arise regarding the support of a learner whose research falls outside the typical ethical format.

5.4 Responsibilities of Undergraduate Learners and Taught Masters Researcher

- Undergraduate Learners and Taught Masters Researchers are responsible for their adherence to their discipline's ethical protocols, Data Protection laws and the *Research Ethics Approval Policy* and guidelines set down within.
- Undergraduate Learners and Taught Masters Researchers are responsible for submitting the completed documentation to the Chair of REAC by the date determined for that academic year (see Appendix 1).

5.5 Responsibilities of Staff Researchers and Postgraduate Researchers

- Staff Researchers and Postgraduate Researchers are responsible for their adherence to their discipline's ethical protocols, Data Protection laws and the *Research Ethics Approval Policy* and guidelines set down within.

6. Associated Documentation

- Appendix 1: *Undergraduate and Taught MA Applications to the Research Ethics Advisory Committee*
- Appendix 2: *Ethics Checklist for Learners and Researchers*
- Appendix 3: *Data Management Guidelines*
- Appendix 4: *Participant Information Sheet Template*
- Appendix 5: *Participant Consent Form Template*
- Appendix 6: *Proposal Summary Form*
- Appendix 7: *Gatekeeper / Agency Information Sheet and Consent Form*
- Appendix 8: *Lone Researcher Guidelines*
- Appendix 9: *Guidelines for Reporting an Adverse Incident during Research Projects*
- Appendix 10: *Handling Complaints Regarding 'Research Misconduct'*
- Appendix 11: *Carlow College Staff and Postgraduate Learners (Levels 9 and 10 by Research) Applications to the Research Ethics Advisory Committee*
- Appendix 12*: External Research Applications to Carlow College*
- Appendix 13: *Approval Form for Dissertation Supervisors*

- Appendix 14: Research *Misconduct Form*

7. Referenced Policies

- *Assessment of Learners Policy*
- *Data Protection Policy*
- *Learner Vetting Policy*
- *Records Management Policy*
- *Academic Integrity and Plagiarism Policy*
- *Learner Code of Conduct and Disciplinary Policy*
- *Staff Code of Conduct and Disciplinary Policy*

8. Monitoring and Review

The Policy will be subject to continuous assessment and evaluation. The Policy will be formally reviewed on an annual basis by the Office of the Registrar, in conjunction with REAC, and any changes will be approved by Academic Council.

Appendix 1: Undergraduate and Taught MA Application to the Research Ethics Advisory Committee

Undergraduate and Taught MA Application to the Research Ethics Advisory Committee

This form is intended as a guide to the process carried out by REAC for students and staff proposing to undertake research involving <u>human or animal</u> participants.

Overview

The academic year runs between September and May of each year. Research projects in Stage IV in some of the degree programmes (Applied Social Studies, and Social, Political & Community Studies and Psychology Stage III), begin by mid-to-late September. Learners on the Masters in Leadership in Therapeutic Child & Social Care begin their research in early October, and learners enrolled on the English & History and Humanities programmes submit their research proposals in late in Stage III. The Applied Social Studies learners, the Social, Political and Community Studies learners and the learners on the Masters programme engage in collecting primary data (surveying or interviewing participants) usually in late January-early February whereas the Humanities and English & History students are ready to do so in September of their Stage IV entry. All dissertations are typically submitted by mid-April of the academic year.

To accommodate the research approval process, the Research Ethics Advisory Committee (REAC), will meet a minimum of four times during the academic year. A preliminary meeting will occur in late August or early September to discuss the year ahead and prepare the relevant timelines and documentation for dissertation supervisors and learners. A second meeting will be held in mid-November to process the completed ethics approval applications. The third meeting in April will be held to check the completed dissertations as part of REAC overview of their processes, and a final meeting will be held in May to review the approval process, the ethics policy and to draft the annual REAC report. Meetings outside of these time frames can be called should the need occur. REAC will also organise information sessions for dissertation supervisors and students on the ethics approval process in September.

Process for Applying for Ethical Approval for a Proposal

One of REAC's responsibilities is oversight of the research carried out under the College's auspices by both learners and staff to ensure it complies with legislative requirements, relevant codes of ethics and best practice in the relevant field. To meet this requirement,

REAC has developed two procedures for approval of research proposals; one for undergraduate and Level 9 taught Masters learners and another for research proposals developed by college staff and Levels 9 and 10 postgraduate learners carrying out their programme by research.

I. Process for Approval of Undergraduate and Taught Masters Research Proposals

Learners are advised to discuss their proposed research informally with their dissertation supervisor as the approval process entails the creation of a number of documents.

Learners seeking approval for research with humans must submit the five documents described in the table below with their Dissertation Proposal to their dissertation supervisor:

No	Document	Instruction
1	Ethics Checklist (see Appendix 2)	• The Checklist will require of the learner / researcher to consider issues of risk in relation to the participants, their chosen topic and themselves. • The Checklist should guide the development of the learner's Dissertation Proposal and be completed in tandem with the writing of the Proposal.
2	Data Management Plan (see Appendix 3)	This document should outline how the learner will store and share research data. The Data Management Guidelines should be considered when drawing up a Data Management Plan
3	Participant Information Sheet (see Appendix 4)	This document should be used as a template, to guide the student's actual participant information sheet.
4	Consent Form (see Appendix 5)	This document should be used as a guideline.
5	Indicative questions to be asked of research participants	Please provide a complete a sample of the research instruments (e.g. a list of the indicative questions to be asked of research participants)

The Checklist is to be completed by the learner and submitted to their supervisor. The supervisor and one other lecturer in the field should sign it if they are satisfied with it and with documents 2-5. The supervisor and other lecturer may also instruct the learner to amend their documentation or implement extra safeguards.

REAC has devised three categories (with corresponding colour coding) of participants for the purposes of research approval: those that may not be interviewed for research (red), those that may be these people may be interviewed and / or observed for the purposes of research

by learners upon the approval of their submitted documentation (green) and those that require extra consideration around the risks of harm (amber). All requests for research approval must submit their applications to REAC.

1. Red Category – these people may not be interviewed or observed for the purposes of research at Carlow College:

   (i) Learners cannot interview / observe anyone unable to give informed consent.

   (ii) Learners cannot interview / observe anyone under the age of 18.

   (iii) Learners cannot interview / observe anyone with an intellectual disability.

   (iv) Learners cannot interview / observe anyone about anything that might reveal engagement in illegal activities.

2. Amber Category – these people may be interviewed or observed for the purposes of research by learners but will require extra consideration of risks and risk reduction. Learners proposing to work with this group will need to submit a summary of their Dissertation Proposal (Appendix 6) and the five supporting documents outlined in the table above to the REAC through their supervisor. Examples of subjects in this category are members of the general public, those who have had life experience of the topic under question, friends and family or anyone related to or friendly with the individuals in Category 1 (people who may not be interviewed by the learners), or research on a topic which has affected the learner / researcher personally.

3. Green Category – these people may be interviewed and / or observed for the purposes of research by learners upon the approval of their submitted documentation by REAC, their supervisor and the other signatory to the *Ethics Checklist*: professional people or people in official positions within an organisation – e.g. counsellors, managers, group leaders, social care workers, Special Needs Assistants, community workers, etc. This category of participant should have had some professional training in their area and belong to an organisation (work in or be a member of).

At this point, one of two outcomes are possible.

1. If the learner / researcher's research falls within the category of pre-approved subjects (Green Category) and the dissertation supervisor and second lecturer are satisfied with submitted documentation, learners are still required to submit their proposal to REAC. The supervisor must forward the *Ethics Checklist* and other supporting documentation to REAC in early November. Research can commence once **both** lecturers have signed the *Ethics Checklist*. The supervisor will keep a copy of the submitted documentation and the learner will bind their copy into the completed dissertation along with all associated documentation (Participant Information Sheets, Consent Form, etc.). The same documentation should be appended to the electronic form of the Dissertation. If a learner fails to include these documents in their final dissertation, then it **will not be assessed**. As oversight of this process, REAC will conduct a spot check of the Dissertations chosen at random before they are marked.

2. If the research proposal falls within the Amber Category (the one that requires extra consciousness of potential risk), then the learner must complete a summary sheet of their research (Appendix 6) which the supervisor must forward along with the *Ethics Checklist* and other supporting documentation to REAC in early November. The REAC Committee will meet in November to consider all applications and will contact supervisors with the outcomes in early December. If the Committee has concerns or recommendations regarding a proposal, these will be communicated to the supervisor who must discuss them with the learner and send them in writing so that the learner may address the concerns or fulfil the recommendations. The learner / researcher will not need to resubmit their proposals at this point. S/he will demonstrate how they have met the concerns or recommendations through inclusion of the relevant measures in their dissertation and the binding of all documentation relevant to addressing the recommendations into the final dissertation. If a learner fails to include these documents in their final dissertation, then it **will not be assessed**. As oversight of this process, REAC will examine all bound dissertations in this situation prior to marking.

Decision Making Within the Committee

Decisions will be based on a majority decision with the Chair having the casting vote. REAC will endeavour to respond within fourteen days following submission of proposals. Members of REAC will withdraw from deliberations when their own learner / researchers are discussed and will play no part in the decision-making process.

Timeline

A timeline specifying exact dates for submission of the *Ethics Checklist* to the learner / researcher's supervisor, for applications to REAC and the date of response from REAC will be furnished each year by REAC to supervisors and learners by the middle of September.

Issues to be Addressed in the Ethics Approval Process

Learner / researchers must demonstrate their consideration of a variety of moral issues in their *Ethics Checklist*, Information Sheets and Consent Forms; for example, learner / researchers must address the issues of confidentiality and anonymity, the keeping and storing of data and information, the assessment and limitation of risk to participants and themselves and fairness and equity in selecting participants, in their documentation.

The process aims to ensure that all research carried out at Carlow College adheres to a high ethical standard. This is a shared endeavour. Before seeking ethics approval, researchers, learners and academic supervisors should review the code of ethics that will govern their particular research project. They should highlight the pertinent issues in relation to their own study. When completing their *Ethics Checklist*, all researchers should:

1. Identify the actual and potential ethical issues and risks in their research.

2. Offer an account of how ethical issues and risks will be addressed in the study.
3. Formulate procedures for dealing with these issues, in consultation with their academic supervisor.
4. Assess risks to data protection. In certain cases, a formal Data Protection Impact Assessment ('DPIA') may be required by law. Your academic supervisor will advise you on the necessity of conducting a DPIA. For guidance see https://www.dataprotection.ie/en/organisations/know-your-obligations/data-protection-impact-assessments. If you need to conduct a DPIA, you should note this in your submission to REAC. REAC may request to see the DPIA after it is completed.

During the subsequent research project researchers have a responsibility to:

1. Implement the procedures agreed by REAC.
2. Attend to ethical issues on an ongoing basis, including seeking feedback from participants.
3. Review and update their ethical procedures and if necessary, to return to REAC.

All supervisors and researchers at Carlow College are expected to familiarise themselves with the following:

Confidentiality and Anonymity

In general, data should be managed and used in such a way as to protect the confidentiality of the research participants. Researchers engaged in 'health research' must be particularly aware of their responsibilities regarding informed consent as a consequence of the GDPR 2016, as well as the Health Research Regulations 2018 which apply to all forms of health research (which is broadly defined) and came into legal effect on 8 August 2018. These place additional requirements for securing informed consent and data protection compliance over and above the general requirements contained in the GDPR.

In relation to confidentiality and anonymity, REAC takes the view that learners should inform themselves of the guidelines relevant to their disciplines. These two terms should be distinguished and may have different meanings in different disciplines. Confidentiality means that 'the proper safeguards are in place to protect the privacy of participants and their information from unauthorized access, use, disclosure, modification, loss and theft.' Anonymity means that 'at no time will the researcher or anyone associated with the project know the identity of the participants. In anonymous research, the information collected does not contain any identifiable information, and the risk of being able to attribute data to a particular individual is low.'[4] Data may be anonymised by removing and identifying pieces of

[4] See Ryerson University's Research Ethics Committee's *Guideline on Anonymity and Confidentiality in Research* at file:///C:/Users/sotten/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/537TFLNV/guidelines-on-anonymity-and-confidentiality-in-research%20(002).pdf. See also the Data Protection Commission's *Quick Guide to the Principles of Data Protection* at https://www.dataprotection.ie/sites/default/files/uploads/2019-11/Guidance%20on%20the%20Principles%20of%20Data%20 Protection Oct19.pdf. See also the Oral History

information such that it' irreversibly prevents the identification of the individual to whom it relates.'[5]

In Social Care and Psychology, and under normal circumstance, the learner is expected to guarantee the greatest level of confidentiality possible to all participants in their research. Blanket guarantees however, should not be given to participants as there may be circumstances under which the learner may have to disclose to other individuals what the participant tells them without their permission, (e.g. the need to report possible criminal conduct to the relevant authorities). This might occur if the learner has a strong belief that there is a serious risk of harm or danger to either the participant or another individual (e.g. physical, emotional or sexual abuse, concerns for child protection, rape, self-harm, suicidal intent or criminal activity) or if a serious crime has been committed.[6] In such cases, the researcher must inform all participants of this possibility in the Participant Information Sheet and research should only proceed once the consent of the participant to this has been obtained.

In some disciplines, such as oral history, it is usual to identify research participants in research outputs, the dissertation in this instance, with the participant's permission. Research participants in other disciplines are not normally identified or identifiable in research projects. In exceptional circumstances the nature of the research may mean that it is not possible to guarantee confidentiality and anonymity to your participants (e.g. very rare and high-profile events, interviews with public figures).

If learners intend to identify research participants in their dissertations, this should be notified to participants in the Consent Form and Participant Information Sheet. In all other circumstances, the learner must do everything they can to protect the privacy of participants and ensure that it will not be possible for third parties to trace any information they provide to the learner back to the participant (without their permission). This guarantee of confidentiality and anonymity also extends to people whom the participant may talk about in interviews.

Where participants are identified or identifiable in research data, the data is personal data in accordance with Data Protection laws. On the contrary, if participants are not identified or identifiable, either because identifying information was not collected at all or the learner has taken steps to anonymise the data, then the data is not personal data and is not subject to Data Protection laws. However, the learner still has ethical responsibilities under this Policy. If the identity of research participants is disguised but the data has not been fully anonymised, data may be referred to as pseudonymised. Detailed guidance on anonymisation and pseudonymisation is available on the website of the Data Protection Commission.[7] Learners should take care when informing participants about how their data will be treated and refer

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Association's *Principles and Glossary* at https://www.oralhistory.org/best-practices-glossary/. For a view from social science and psychology, see https://methods.sagepub.com/reference/the-sage-encyclopedia-of-communication-research-methods/i3126.xml.

[5] See dataprotectionie/sites/default/files/uploads/2019-06/190612%20Anonymisation%20and%20Pseudonymisation.pdf

[6] See the requirements under the *Children First Act 2015*, and under the *Children First National Guidance for the Protection and Welfare of Children 2017.*

[7] See www.dataprotection.ie/en/guidance-landing/anonymisation-and-pseudonymisation for guidance.

to Data Protection Commission guidance to ensure that they are using appropriate terminology.

Data Retention, Protection and Destruction

Research data refers to any and all recorded descriptive, numerical, or visual material collected and used in the conduct of research, irrespective of medium. It may include physical, and electronic records, digital images, microfilm, microfiche, audiotape, videotape, and photographs. Research data may be augmented by objects, specimens, and samples.

Research by which participants are directly identified (e.g. by name) or identifiable (e.g. if not named but by linking different bits of data) is personal data and both the learner and Carlow College are obliged to manage research data in accordance with Data Protection laws, including the *General Data Protection Regulation (GDPR)* and the *Data Protection Acts 1988 to 2018*.

Learners are to outline in the Data Management Plan how they intend to document their project, and store and share data. Learners are to use the Data Management Guidelines (Appendix 3) to steer the content of their Data Management Plan.

Learners must ensure that they obtain written consent from each participant from whom they gather data. Consent forms should treat of data collection, retention, sharing, storage and potential destruction.[8] Safeguards that learners put in place to protect the security and integrity of the data depend on how sensitive the data is.

Limitation of Risk

REAC acknowledges that some level of discomfort, stress or embarrassment and risk of harm to both participants and researchers may be unavoidable, but the researcher is expected to show that they have done everything possible to minimise such risk and discomfort. The researcher must also ensure that participants have been made fully aware of any potential risks or discomforts in advance so that they can make properly informed consent.

Researchers are also obliged to limit the risk of physical and psychological harm to themselves as much as possible – in the research context taking risks is not a personal decision. This includes taking proper precautions for their physical safety. Although it is not part of the ethical approval process for research with non-vulnerable populations and non-sensitive topics, researchers should be aware that research is by its nature intrusive and may uncover distressing material in completely unexpected ways. For their own benefit and the benefit of their participants it is recommended that all learner / researchers consider how they will respond to distress should it arise in the course of researching their topics.

[8] REAC notes that data protection and destruction may be discipline specific.

Appeals

When the decision of REAC results in approval for a research proposal being declined or requiring specific modification, the learner / researcher or their supervisor may appeal the decision to the Chair of the Teaching, Learning & Assessment (hereafter TL&A) Committee. The appeal must be in writing setting out the basis for the appeal. It must be received two weeks after the original decision was communicated to the learner / researcher. The Chair of the TL&A Committee may refer the appeal back to REAC for review or request a new panel of three members to review the proposal and make a recommendation. A response to the Appeal should be returned no later than one month after submission of the Appeal.

Research Integrity and Research Misconduct

In every situation where there is a complaint against a learner that may constitute a personal data breach, the Dissertation Coordinator or any other staff member who is aware of the situation must report the matter to the Data Protection Officer without delay in accordance with the College's *Data Protection Policy*.

Assessment of a data breach will be carried out under the College's Data Breach Response Plan, which is included in the *Data Protection Policy*. Staff relevant to research ethics and supervision of the learner will be involved in the assessment of a reported data breach. Assessment of a data breach may occur in parallel with an investigation into the matter by other staff.

Where there is a complaint against the integrity of a researcher's work, this will be dealt with through the relevant disciplinary procedures of the Office of the Registrar (see Appendix 10).

Providing Support to Dissertation Supervisors

One of REAC's objectives is to support Dissertation Supervisors in matters related to ethical research. To this end, REAC will provide an information session / workshop for supervisors at the beginning of each academic year around the process of application for ethical approval. New dissertation supervisors are required to attend this workshop. REAC will also provide advice and clarifications to queries from individual supervisors through their respective programme representative on the committee. In conjunction with the College's Data Protection Officer, REAC will also provide training for supervisors on important Data Protection matters.

Appendix 2: Ethics Checklist for Learners / Researchers

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ETHICS CHECKLIST FOR LEARNERS / RESEARCHERS

This form is intended as an initial checklist for researchers (undergraduate, postgraduate and staff) proposing to undertake research involving human or animal participants. The form (together with sample participant information sheet, sample informed consent form, indicative questions and a Data Management Plan) must be submitted to the supervisor (where relevant) with the research proposal prior to the commencement of the research project.

This form, and any necessary additional documentation shall be retained by the supervisor to be available for inspection by REAC as required, and shall subsequently be attached to the completed Dissertation, in both hard copy and electronic format, once submitted for assessment.

Non-compliance by the researcher with these requirements will result in the dissertation not being assessed.

Learner / Researcher Name	
Learner ID Number	
Course Name	
Supervisor Name	
Dissertation Title	

I. PARTICIPANTS & TOPICS

Question	Yes	No
1. Are any of your participants unable to give informed consent, (e.g. individuals under the age or 18 or intellectually challenged persons)?		
2. Are any of your proposed participants potentially vulnerable, (e.g. members of a self-help group or minority group, prison populations)?		

3. Will your proposed research require cooperation of a gatekeeper* for initial access to participants, (e.g. residents of a nursing home, SNAs)?		
4. Will your proposed research involve collection of data relating to sensitive topics, (e.g. sexual activity, drug use, suicide, discrimination)?		
5. Is distress likely to result from your proposed research?		
7. Does your proposed research involve deception?		
8. Will it be necessary for participants to take part in your proposed research without their knowledge and consent at the time, (e.g. covert observations of people)?		

*Gatekeeping is the process of allowing or denying another person access to someone or something (Holloway and Wheeler, 2002)

II. RISK MANAGEMENT

Question	Yes	No
1. Have you considered possible foreseeable risks in your research?		
2. Will you develop systems to minimise possible risks?		
3. Will you develop procedures or responses to these risks in the event they arise?		

III. DATA MANAGEMENT

Question	Yes	No
1. Will your research involve the collection of audio, photographic or video material?		
2. Does the research use an interview?		
3. Does the research use a questionnaire/survey?		
4. Will your research ask for personal information and/or ask sensitive questions?		
5. Will you have a Data Management plan – to describe how you will collect, manage, share and store personal data?		

6. Have you determined whether confidentiality is necessary, and if yes, how you will meet its requirements?		
7. Have you determined whether anonymity is necessary, and if yes, how you will ensure it?		

NB. Please attach the following documents to your checklist:

- **Sample Consent Form (see Appendix 5)**
- **A Data Management Plan (see Appendix 3)**
- **A list of indicative questions and schedules you propose using for your research**
- **An indicative Participant Information Sheet (see Appendix 4)**

IV. LEARNER / RESEARCHER DECLARATION

I will provide a detailed information sheet to all participants and will obtain full, voluntary and informed consent. The information provided will explicitly state what the research involves, its purpose and methodology, and what the participants will be expected to do during the research process.

I understand that if, during the course of research, the answer provided to questions on the Ethics Checklist changes, or if my research changes direction, or if a new risk materialises that I am obliged to stop my research and inform my supervisor immediately.

The participants will be assured in writing of their entitlement to withdraw from the research process.

Furthermore, I confirm I have read the *Carlow College Research Ethics Advisory Policy* prior to completing this form.

I understand that if my research project changes substantially, new and revised consent may be required from participants.

Signed:_____

Date: _____

V. SUPERVISORS DECLARATIONS (to be signed by BOTH supervisors before research commences)

Primary Supervisor Declaration:

I declare that I have discussed with the learner the ethical considerations surrounding their proposed research and the implementation of the required safeguards.

Supervisor Name: (printed) _____

Supervisor Signature: _____

Date: _____

Second Supervisor Declaration:

I declare I have reviewed the documentation submitted and that all relevant ethical issues in the proposed research have been adequately considered and addressed.

Supervisor Name: (printed) _____

Supervisor Signature: _____

Date: _____

Office Use Only

REAC ref number:

Decision/Comments:

Appendix 3: Data Management Guidelines

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Data Management Guidelines

Learners may collect and analyse data as part of research projects. Where people are identified or identifiable in research data, it is personal data within the meaning of Data Protection laws, including the *General Data Protection Regulation (GDPR)* and the *Data Protection Acts 1988 to 2018*. This places obligations on the learner to manage the data carefully and to be transparent with research participants about how the data is managed.

Carlow College, St Patrick's requires all learners to abide by both ethical protocols and Data Protection laws, when using personal data as part of research projects.

Learners are to follow the guidelines set out in this document in order to assist them to comply with Data Protection laws.

Supervisors and the REAC are also to consider the guidelines in this document when considering the suitability of learner documentation and when putting conditions in place for research projects.

Learners are to provide information to both their supervisors and participants about how their research projects meet the guidelines set out in this document. This is to be completed by the following means:

- A Data Management Plan is to be provided by learners to their supervisors with their *Ethics Checklists*. This plan, at a minimum, should indicate how the research data will be collected, whether it will be in hard copy or electronic format, how it will be stored, how long it will be retained for, for what purposes it will be used, and whether personally identifying information will be collected. Researchers are responsible for the safe management of any data – interview recordings and transcripts, signed consent forms, etc. - relating to their dissertation research.
- Information about how their data will be managed is to be provided by researchers to participants in Participant Information Sheets and Consent Forms.
- It is the responsibility of supervisors and the REAC to ensure that researcher documentation and practices meet these guidelines.

Researchers are to respond to the following points in preparing their Data Management Plan, Information Sheets and Consent Forms:

If it is possible to carry out research anonymously (e.g. by not collecting personally identifying information), personal data should not be collected. Please note that anonymity is not appropriate in some disciplines and circumstances (for example, in History). Advise participants that their participation is voluntary.

- Give each participant a copy of their Consent Form and Information Sheet.
    - In all cases involving human subjects, consent must be obtained from all participants in the study for the collection, retention, storage and destruction of specific data involved in that study.
- Advise participants that they can refuse to answer questions, but researchers should then consider whether the individual's data remains usable if some questions are not answered.
- Advise participants that they may withdraw from the interview process at any time and ask for their data to be destroyed / deleted. Indicate to participants that it may not be entirely possible to withdraw all data once a dissertation is submitted or an article is published.
    - Explain to participants how to withdraw from the project.
- Blanket assurances of confidentiality should not be given to participants. Instead, confidentiality should be offered as far as the law allows.
    - If an issue arises with a breach or possible breach of confidentiality, the researcher or supervisor should refer this to the Dissertation Co-ordinator without delay.
- In group situations such as focus groups, state that you will keep the data confidential but that you cannot guarantee that other group members will maintain confidentiality
- Inform participants as to whether and how interviews are being recorded.
- Learners are to retain all research data securely so that it is not accessible to others and in order to protect its integrity.
- Specify exactly where data will be kept. This includes signed Consent Forms and data gathered through research.
    - Hard copy data must be kept in a secure location, for example, in a locked filing cabinet or secure office.
    - All electronic data should be stored on secure servers and NOT on a portable device (e.g. a memory key or USB stick). In the case of recorded interviews, the interview should be copied as soon as possible after recording to the student's One Drive space on the college server and wiped from the recording device. Students and supervisors should note that both recording methods – phones and digital recorders - offer different vulnerabilities; with phones, material could be inadvertently shared on social media, and memory cards in digital recorders are not encrypted. Accidents easily happen with both methods and should be reported.

    - Measures used to secure data should be proportionate to the level of sensitivity. For example, sensitive data should be encrypted to an adequate level.

- Researchers (where relevant) should indicate where they will store data after they leave College, as College accounts are available only to current learners.
- Researchers may choose whether or not to transcribe interviews. Interview transcription is time-consuming, and researchers may elect to transcribe only portions of interviews that they intend to use in their dissertations, articles or reports.
- Advise participants what further records will be created e.g. if interviews will be transcribed.
- Advise participants about whether or not they will receive a transcription of their interview.
- Advise participants about how long the data collected will be stored. It should only be stored for as long as is necessary, having regard to the purpose for which the data was collected. The period for which it is stored will be determined by a variety of considerations. For example, by certain legal requirements or the requirements of particular professional associations and codes. It may also be influenced by funding requirements or the requirements of publishers. Thus, undergraduate students who collect data for their Dissertation will only retain the data until the end of the academic year in which they submit their Dissertation. If, however, the learner or any researcher intends to publish, they may need to retain the data for longer.
- Inform participants if you intend to keep anonymised data for a longer period than personally-identifying data.
- Inform participants as to whether their data will be anonymised in the research piece (e.g. Dissertation, article or report). Anonymisation has a specific meaning. It means that it is completely impossible for any person to identify a participant. If you are not anonymising data, then do not suggest to participants that data will be anonymised. It may be more appropriate to say in many instances that directly identifying personal data is removed
- Inform participants as to whether or not they will be identified or identifiable in your dissertation. The norm is that participants are not identified or identifiable, however, there may be differences between different disciplines
- Inform participants about who may have access to their personal data (i.e. consent forms and research data).
- Participants should be asked for consent to be quoted in research outputs (e.g. dissertation, presentations etc.).
- Inform participants that dissertations and presentations may be available to other individuals. Dissertations may be lodged in the College Library and will be available for consultation following the individual programme criteria.

- Researchers are to include their own and their supervisor's contact details on Information Sheets.
- Inform participants how you will generally communicate with them e.g. email.
- Learners are to dispose of research data by secure confidential means e.g. shredding for paper records.

Appendix 4: Participant Information Sheet Template

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CARLOW COLLEGE
ST. PATRICK'S

Participant Information Sheet Template

The following is a suggested template for participant information sheets. You may adjust and populate the template to suit your project and intended audience. Use clear, simple English at all times and avoid abbreviations and acronyms. This template is designed primarily for those doing qualitative interviews with adults from non-vulnerable populations and dealing with non–sensitive topics. You will need more adjustment and supervision if working with focus groups or structured interviews. If conducting research with vulnerable populations and / or sensitive topics, please see Carlow College *Research Ethics Advisory Policy* for further details. If you intend to publish your research, you should also:

- Use the correct data retention policy. This will depend upon the reason for which you are collecting the data and various professional associations' requirements among other factors, (see Appendix 3).
- Declare any funding for your research and / or conflict of interest.
- Outline provisions for checking direct quotations with participants to ensure that they reflect accurately what the participant said and are used in their proper context.
- External researchers and / or Carlow College Staff should provide information sheets and consent forms on headed paper from the most appropriate institution.

Participant Information Sheet Template

[TITLE OF THE STUDY]:

The title should be clear, self-explanatory and consistent across all documents referring to the study.

I would like to invite you to take part in a research study. Before you decide you need to understand why the research is being done and what it would involve for you. Please take time to read the following information carefully. Ask questions if anything you read is not clear or if you would like more information. Take time to decide whether or not to take part.

WHO I AM AND WHAT THIS STUDY IS ABOUT?

Explain who you are and why you are doing this study. Explain the overall aim of the study. When describing the study take care to be as neutral as possible and avoid suggesting any bias about what you expect the outcomes from the research to be. If the research is being undertaken as part of a course of study state what qualification will result from the process.

WHAT WILL TAKING PART INVOLVE?

Explain what taking part in the research will involve including a list of topics that you will discuss and the expected location and duration of participation. If you plan to use audio or video recording discuss that also.

WHY HAVE YOU BEEN INVITED TO TAKE PART?

Explain why you have selected this particular individual to take part in your research and how you came to select them.

DO YOU HAVE TO TAKE PART?

Explain that participation is completely voluntary and that the person has the right to refuse participation, refuse any question and withdraw from the interview or research at any time pre-publication. Explain also that removal of all data may not be practicable after a certain point, for example, after submission of the Dissertation.

WHAT ARE THE POSSIBLE RISKS OF TAKING PART?

Describe any foreseeable risks or discomforts that could arise and explain how they will be minimised. Consider any possible physical or psychological harm that may come to a participant as a result of participating in the research and what you will do should such a situation arise.

WHAT ARE THE POSSIBLE BENEFITS OF TAKING PART?

Give a realistic assessment of the possible benefits of the research. Do not exaggerate what the research will achieve.

WILL TAKING PART BE CONFIDENTIAL?

If this is relevant and in accordance with the ethical guidelines of your field, explain what steps you will take to ensure the confidentiality of the participant's data and any individuals they talk about, in the submitted dissertation. Outline the situations in which you may have to break confidentiality: if the researcher has a strong belief that there is a serious risk of harm or danger to either the participant or another individual (e.g. physical, emotional or sexual abuse, concerns for child protection, rape, self-harm, suicidal intent or criminal activity) or if a serious crime has been committed. You should also make it clear that non-anonymised data in the form of signed consent forms and audio or video recordings are collected and retained as part of the research process.

HOW WILL THE INFORMATION YOU PROVIDE BE RECORDED, STORED AND PROTECTED?

Explain how the data/interview will be recorded and outline the arrangements for storing the research data (where it will be stored, security arrangements, who will have access).

WHAT IF YOU ARE AFFECTED BY THE SUBJECT MATTER OF THE INTERVIEW? (Mainly relevant for research on sensitive subjects).

Provide a list of support organisation and their contacts, or the website of relevant organisations.

WHAT WILL HAPPEN TO THE RESULTS OF THE STUDY?

Outline fully and realistically your plans for the dissemination of the final research product including conferences, publications and teaching use. If your plans for the research only consist in submitting your dissertation, then simply state this. You should offer to provide a summary of your findings to participants, should they so desire. Nominate a means to facilitate this.

WHO SHOULD YOU CONTACT FOR FURTHER INFORMATION?

Provide the name, affiliation and contact details of all researchers involved in the research as well as the name and email of your supervisor in case participants have any questions or concerns about the research.

YOUR DATA PROTECTION RIGHTS

Further information about Data Protection is available in a Privacy Notice for Research Participants, published on the College website. The Privacy Notice outlines participants' Data Protection rights and how they may exercise them.

[THANK YOU]

Appendix 5: Participant Consent Form Template

Participant Consent Form Template

This template is designed primarily for those doing qualitative interviews with adults from non-vulnerable populations and dealing with non–sensitive topics. The form would be different in the case of focus groups or quantitative research. If conducting research with vulnerable populations and / or sensitive topics, please see the *Research Ethics Advisory Policy* and consult with your supervisor for further details. The points listed on the template below are for illustration only. You may alter the wording to suit your project as you see fit, however, you must remain within the parameters set by this Policy. Be aware that different disciplines have different ethical requirements in relation to certain aspects of research, for example, anonymity of participants. Make yourself familiar with your discipline's requirements.

A consent form is not simply about a person giving you permission to involve them in research, it is an agreement between the researcher and the research participant outlining the roles and responsibilities they are taking towards one another throughout the whole of the research process. The researcher should retain one copy of the consent form signed by both themselves and the participant. The participant should also be given a copy of the consent form as a record of what they have signed up to. Even if a person has signed a consent form consent should still be re-established at the point of doing the interview.

Participant Consent Form Template[9]

[Title of project]

Consent to take part in research

- I…… voluntarily agree to participate in this research study.

- I understand that even if I agree to participate now, I can withdraw at any time during the interview or refuse to answer any question without any consequences of any kind.

- I have had the purpose and nature of the study explained to me in writing and I have had the opportunity to ask questions about the study.

- I understand that participation involves*…….[outline briefly in simple terms what participation in your research will involve]*.

- I understand that I will not benefit directly from participating in this research.

- I agree to my interview being audio-recorded. [*if relevant*]

- I understand that all information I provide for this study will be treated within the limits of confidentially.

- I understand that in any report on the results of this research my identity will remain anonymous. This will be done by changing my name and potentially disguising any details of my interview which may reveal my identity or the identity of people I speak about. *[If relevant to your discipline].*

- I understand that disguised extracts from my interview may be quoted in*…(list all forum in which you plan to use the data from the interview: dissertation, conference presentation, published papers etc.)*. *[If relevant to your discipline]*

- I understand that if I inform the researcher that myself or someone else is at risk of harm they may have to report this to the relevant authorities - they will discuss this with me first but may be required to report with or without my permission.

- I understand that signed consent forms and original audio/video recordings will be retained in *[specify location, security arrangements and who has access to data]* until [*state how long you will keep this data. It should only be kept for as long as is necessary with regard to the purpose for collecting the data; e.g. until the end of the academic year in which you submit your Dissertation, or until the minimum time specified by your professional association, if publishing*.]

[9] The wording of this template may be altered in the case of focus groups or quantitative research.

- I understand that I am free to contact any of the people involved in the research to seek further clarification and information. *[Names, degrees, affiliations and contact details of researchers and of the supervisor].*

I agree to participate in this study on the basis of information provided to me in this Consent Form and Information Sheet.

Signature of participant: _____

Date: _____

I believe the participant is giving informed consent to participate in this study

Signature of researcher: _____

Date: _____

Appendix 6: Proposal Summary Form

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ST. PATRICK'S

Proposal Summary Form

Please complete the following form (Typed) in full and submit to your Dissertation Supervisor along with your completed *Ethics Checklist*, an indicative *Participant Information Shee*t, *Participant Consent Form*, *Gatekeeper / Agency Information Sheet* and *Consent Form* (if relevant) a Data Management Plan and a list of indicative questions and schedules you propose using for your research.

For undergraduate learners and Taught Master learners, the completed form and associated documentation will be forwarded to REAC by your supervisor.

Carlow College staff and postgraduate (Levels 9 and 10 by Research) should forward the completed form and associated documentation to REAC.

Please note that data collection cannot proceed without ethical approval from the REAC.

* * * *

Name: _____

Student Number: _____

Supervisor: _____

Dissertation Title: _____

1. Explain what the project is about.

2. List the Ethical code(s) or standards you are using to guide your research.
3. Explain who your participants are, why you selected them and how you will make initial contact with them.
4. Explain what the possible risks to participants are.
5. Explain what you will do to minimise risk to the participants.
6. Explain what you will do if participants do not want to take part or who change their mind during the study.
7. What will you do if a participant has questions or does not understand something?
8. Explain what will happen to the information / data acquired, in what form you will record it (paper or electronic or both), who will see it, how long you will keep it, and when it will be destroyed.
9. If confidentiality is required, explain how this will be achieved.
10. If anonymity is required, explain how it will be achieved.

11. Explain how participants can have access to your results, should they so wish. E.g. A summary of your dissertation findings and how the participant can access that after the Dissertation is complete.

Appendix 7: Gatekeeper / Agency Information Sheet and Consent Form

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ST. PATRICK'S

Gatekeeper / Agency Information Sheet and Consent Form

Generally speaking, you can provide a combined information sheet and consent form for gatekeepers / agencies. The following is a suggested template for a Gatekeeper or Agency information sheet / consent form. You may adjust and populate the template to suit your project in conjunction with your dissertation supervisor. If the role of the gatekeeper or agency is more involved the information sheet and consent form will need to reflect this. The information sheet and consent form for gatekeepers / agencies can take the form of a letter if that is more convenient. This template is designed primarily for those doing qualitative interviews with adults from non-vulnerable populations and dealing with non–sensitive topics.

Gatekeeper / Agency Information Sheet and Consent Form Template

COLÁISTE CHEATHARLACH
NAOMH PÁDRAIG
CARLOW COLLEGE
ST. PATRICK'S

[TITLE OF THE STUDY]:

The title should be clear, self-explanatory and consistent across all documents referring to the study.

I would like to invite you to assist me in conducting a research study. Before you decide you need to understand why the research is being done and what it would involve for you and for the participants. Please take time to read the following information carefully. Ask questions if anything you read is not clear or if you would like more information. Take time to decide whether or not to facilitate this research.

WHO I AM AND WHAT THIS STUDY IS ABOUT?

Explain who you are and why you are doing this study. Explain the overall aim of the study. When describing the study take care to be as neutral as possible and avoid suggesting any bias about what you expect the outcomes from the research to be. If the research is being undertaken as part of a course of study state what qualification will result from the process.

WHAT I NEED YOUR ASSISTANCE WITH

Explain exactly what it is you want the gatekeeper to do: how many participants? How will they be selected? Inclusion and exclusion criteria. Who will have access to database information? Clarify that the gatekeeper role is simply one of distributing information and that interested participants should contact the researcher directly, not the gatekeeper. Also clarify any other role you expect the gatekeeper to have e.g. distributing information sheets.

WHAT TAKING PART IN THE RESEARCH WILL INVOLVE?

Explain what taking part in the research will involve including a list of topics that you will discuss with research participants and the expected duration of participation. Clarify that participation is voluntary and outline any possible risks and benefits to taking part.

WHO WILL HAVE ACCESS TO DATA FROM RESEARCH?

Explain the steps you are taking to ensure that participants' data will be confidential and anonymous and clarify who will have access to the data. Also outline the circumstances in which you will be obliged to break confidentiality and the courses of action you might take in such circumstances.

WHAT WILL HAPPEN TO THE RESULTS OF THE STUDY?

Outline fully and realistically your plans for the dissemination of the final research product including conferences, publications and teaching use. If your plans for the research only consist in submitting your dissertation, then simply state this.

WHO SHOULD YOU CONTACT FOR FURTHER INFORMATION?

Provide the name, affiliation and contact details of all researchers involved as well as supervisor details where relevant.

[THANK YOU]

NOTE: In the case of repeat interviewing or data collection, consent need to be renewed at each stage.

The time the person is given to consider participation will vary between studies depending on the nature of the topic, what participation involves, the capacity of the participant and so on. While it might be acceptable to provide a short timeframe to obtain consent for a short questionnaire, participation in a lengthy series of biographical interviews would require a much longer period of consideration. What is appropriate needs to be thought through for each study. Typically, a qualitative interview on a non-sensitive topic with a person who is not from non-vulnerable population would involve a period of consideration somewhere between 24 hours and one week depending on the population and topic.

Appendix 8: Lone Researcher Guidelines

Lone Researcher Guidelines

The following document provides guidelines for researchers (staff and learners) who are working alone or in small teams. They are intended to provide guidance to researchers 'in the field', irrespective of whether they are working on independent research projects or externally funded ones.

It is your responsibility to ensure that a colleague or 'buddy' is aware of the details of your visit and has agreed to monitor during the visit and when the visit is completed. Ensure that your nominated colleague is available by phone and contactable by you for the duration of your visit. Researchers should follow these guidelines and to use their professional judgement and common sense at all times. **Your safety is the primary concern, which should be placed above completion of research tasks.**

Good Practice for Lone Researchers

- Maintain a schedule of visits as well as a personal diary recording fieldwork. If you are a student, provide your supervisor with this schedule in advance of site visits. For members of staff, ensure a colleague knows where you are working.
- Talk through how to conduct home visits with your research supervisor (for learners) or a more experienced member of staff (for academics). Ask a colleague to accompany you if you feel at all uneasy about conducting a research visit on your own.
- Obtain information about where you are visiting before the visit. For instance, ask how many people will be at the visit and where you can park your car / find the nearest public transport.
- If awkward or potentially threatening situation arises, this should be reported to your dissertation supervisor and / or to the Chair of REAC as soon as possible. On return from the visit, provide all relevant information, (e.g. if you felt at risk or if there was an incident). This should be formally recorded and reviewed with the Chair of REAC to ensure appropriate follow-up action is taken and to minimise any risk in subsequent visits. An *Accident / Incident Report* should also be filled out and sent to the Health & Safety Officer.
- Make (and keep) pre-arranged appointments. Notify the participant if you cannot keep them. Share this schedule with your supervisor / a colleague. Try to arrange

research site visits during daylight hours whenever possible. During winter months, weekend visits may be more suitable than evening appointments.

- Consider the purpose of the visit. Does it pose a higher than usual potential of bringing about a dangerous response e.g. an interview in connection with emotional matters? If so, consider asking a colleague to accompany you or arrange to interview the person in a public place such as a coffee shop.
- If, for any reason, you are concerned for your personal safety once you arrive at your appointment venue, then do simply cancel your appointment and leave the research site. On return to the office, make alternative arrangements – for instance having a member of staff experienced in working on their own accompany you.

General Guidelines

- Ensure that you have your mobile phone with you at all times. Make sure it is fully charged when you are doing fieldwork, bring a charger with you.
- Save the relevant security and emergency numbers (e.g. local Garda Offices) in your phone.
- Alert a named colleague or 'buddy' when your work involves you working alone, in vulnerable situations or undertaking home visits, so that an effective process is put in place to ensure your safety.
- When conducting research away from your own College, carry your College identity card (with photograph).
- Ensure you have a map of the area you are working in, plan your route in advance.
- Consider carrying a personal alarm (to be kept in an accessible place) to attract attention in an emergency
- Reduce the number of money and valuables you carry, avoid wearing expensive jewellery or watches.
- If an item is grabbed – let go of it!
- Avoid travelling by foot if feeling vulnerable. Use public transport, private car or travel by registered taxi
- In multi-storey buildings, think about safety when choosing lifts or staircases.
- Let research participant's interviewee know that you have a schedule and that others know where you are. This may involve arranging for a colleague or taxi to collect you, or arranging for someone to call you at a designated time.
- Leave your mobile phone switched on in silent mode, even during interviews.
- Assess the layout and the quickest way out of a research site. If interviewing in a private dwelling, stay in the communal rooms.

When Using Your Own Car for Travel

- With your nominated colleague / buddy, share the make, model, colour and registration of the car you will be driving and the route you will be taking.
- Ensure you have adequate breakdown service.
- Ensure that car users have the appropriate level of insurance cover.
- Drivers should travel with doors locked and windows closed. If windows are open, handbags and briefcases should be kept out of sight.
- At night, the car should be parked in a well-lit and busy place. Multi-storey parks, or car parks where the car and the user will not be easily visible, should be avoided.
- If a driver thinks they are being followed, they should keep driving until they reach a busy area - Garda station or a garage, etc.
- Staff should avoid taking research participants as passengers.

During a Home Visit

- Your safety is the primary concern, which should be placed above completion of research tasks.
- Do not enter someone's home if you don't feel comfortable or safe. If you feel uncomfortable while in a person's home, you should take steps to leave immediately.
- Do not enter a house if the person you have arranged to see is not there. Be aware of, and maintain, personal safety at all times during visits.
- Always explain your research role clearly and the conditions of confidentiality.
- If the participant is anxious, consider encouraging them to have a carer / friend within sight / hearing.
- When visiting people's homes, try to let them lead the way. Avoid being the first to go into any room. Be extra careful when alone with participants e.g. fetching something from a handbag, comforting participants.
- You should always make sure that the exit from the room is clear.
- If you are in any doubt about the behaviour of animals in the home, ask for it / them to be locked away while you are visiting.
- Never undertake an interview or assessment in the bedroom.
- Do not give your personal telephone number or address to clients.
- You should not interview anyone who is under the influence of alcohol or drugs.

- A professional and friendly attitude should be adopted but over-familiarity must be avoided.
- Remember that the interviewee may also feel anxious about the interview and your visit. You should bear this in mind whilst also ensuring your own safety.
- Be alert for signs of threatening behaviour and danger, e.g. raised voice, rapid speech and babbling indicate rising tension; Changes in voice or body language as the conversation progresses may suggest anger, frustration or impending violent behaviour, e.g. flushed face, fidgeting, pointing, folded arms.
- Keep your distance. Each of us has a personal space, which we defend when we feel it is being invaded.

Appendix 9: Guidelines for Reporting an Adverse Incident during Research Projects

COLÁISTE CHEATHARLACH
NAOMH PÁDRAIG
CARLOW COLLEGE
ST. PATRICK'S

Guidelines for Reporting an Adverse Incident during Research Projects

An Adverse Event is an event that occurs during the course of a research protocol that either causes physical or psychological harm, or increases the risk of physical or psychological harm, or results in a loss of privacy and / or confidentiality to a research participant or others (such as family members).

An Anticipated Adverse Event is one that is reasonably expected and / or listed in the protocol and consent form as a risk of participating in the research. Examples of an anticipated adverse event include, but are not limited to, the following:

- A participant in a study of domestic violence becomes upset during the re-telling of the traumatic event and requires a referral to a counsellor.

An Unanticipated Adverse Event is one that was not reasonably expected and / or is not listed in the protocol and consent form as a risk of participating in the research. Examples of an unanticipated adverse event include, but are not limited to, the following:

- A participant in a study of the benefits of eating strawberries experiences a previously undetected allergy to strawberries;
- A child participant in a study of how to improve classroom behaviour experiences bullying by other students as a result of her participation in the study.

A Serious Adverse Event is one whose magnitude or frequency is above expectation. For example:

- An anticipated side effect of a certain dietary protocol results in a much more serious manifestation of that effect than would be expected (i.e., a high-fibre diet results in severe diarrhoea and vomiting requiring hospitalisation).

A Related adverse event is one that, in the opinion of the investigator, is likely caused by or affects the research.

- A participant in a study about domestic abuse experiences a panic attack after telling the investigator about an incidence of physical or verbal abuse;
- A participant in a study about the benefits of a nutritional supplement on recovery from weight-lifting experiences an allergic reaction to the product after it is ingested.

Events that are not related to study procedures and are not serious may be reported at the time of re-approval. Examples of unrelated events that may be reported at the time of re-approval include:

- A participant in a study gets the flu and has to withdraw from the study (report as a withdrawal);
- A participant in a longitudinal study of secondary school learners' transition to college life drops out of school and withdraws from the study (report as a withdrawal);
- A participant in an observational study of child behaviour during break time falls on the playground and sprains her ankle (report in summary of findings).

TO BE PROCESSED IMMEDIATELY FOLLOWING AN ADVERSE EVENT

Please complete project details:

Project Title:
Name of learner/ researcher
Name of Supervisor:
Carlow College (External College) E-mail:
Contact Tel No.:
Course Name and Code (if applicable):
Date of event:

Notifications of adverse events: Please provide details of circumstances that gave rise to the adverse event
How many were affected by the event?
Please specify the corrective actions employed

Has this issue been resolved?

Signed: _____

(delete as appropriate) Lead Researcher/learner in case of project work

Date: _____

Notification of adverse events should be submitted electronically to sotten@carlowcollege.ie **and marked urgent.**

Any adverse event that involves a breach of security of research data should be reported to the Data Protection Officer, Carlow College, without delay by emailing dataprotection@carlowcollege.ie.

Appendix 10: Handling Complaints Regarding 'Research Misconduct'

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Handling Complaints Regarding 'Research Misconduct'

Researchers may make honest errors in collection or interpretation of data, but penalties for misconduct may apply where practices have been adopted that deviate significantly from those commonly accepted by the academic community for conducting, reporting, or proposing research. These include plagiarism, misuse of funds, and fabrication of data, but also abuse of position, e.g. as supervisor, lead author or reviewer. All unethical conduct of research involving humans should be reported in the first instance to the relevant dissertation supervisor and then to the Chair of REAC.

'Research Misconduct' Definition

Research misconduct means fabrication, falsification, or plagiarism in proposing, performing, or reviewing research, or in reporting research results. Further definitions are as follows:

a. Fabrication is making up data or results and recording or reporting them.

b. Falsification is manipulating research materials, equipment, or processes, or changing or omitting data or results such that the research is not accurately represented in the research record.

c. Plagiarism is the appropriation of another person's ideas, processes, results, or words without giving appropriate credit.

d. A breach of research ethics that centres around Data Protection

e. Research misconduct does not include honest error or differences of opinion.[10]

Complaints Process

In the case of undergraduate and postgraduate students, the complaint will be dealt with by the Supervisor in the first instance, following the College's *Plagiarism Policy* and *Learner Code of Conduct and Disciplinary Policy*. In the case of a complaint against a member of staff's

[10] See the Irish Universities Association's discussion on this in their *National Policy Statement on Ensuring Research Integrity in Ireland*, first published in 2014 and revised in 2019 at https://www.iua.ie/publications/view/national-policy-statement-on-ensuring-research-integrity-in-ireland/

research work, the matter will be dealt with by the Office of the Registrar, under policies which are currently being developed.

Penalties for Misconduct

Where a learner has been found to engage in research misconduct or unethical research, they will be subject to academic sanctions.

As soon as possible after the discovery of the alleged misconduct, taking account of the context and nature of the case, the following course of action may be taken:

Direct discussion with the learner to provide further advice about research integrity and how to avoid misconduct in the future.

REAC reserves the right to withhold a grade for a dissertation due to non-compliance with REAC policy.

The learner may be required to resubmit the amended work / assignment with any of the sanctions listed below:

a) Resubmission of the work / assignment without penalty;

b) Resubmission of the work excluding unethical content;

c) Resubmission of the work / assignment with a penalty of a mark reduction of 5% or 10%;

d) Resubmission of the work / assignment with a capping of the grade / mark to a pass / 40%.

In the case of b) and c) above, a Misconduct Record Form must be filled in (see Appendix 13). This form should be emailed to the Office of the Registrar, the Programme Director and the relevant Academic Advisor.

Appendix 11: Carlow College Staff and Postgraduate Learners (Levels 9 and 10 by Research) Applications to the Research Ethics Advisory Committee

Carlow College Staff and Postgraduate Learners (Levels 9 and 10 by Research) Applications to the Research Ethics Advisory Committee

This form is intended as a guide to the process carried out by REAC for staff and postgraduate learners (Level 9 and 10 by research) proposing to undertake research involving <u>human or animal</u> participants.

Overview

The remit of REAC is to oversee compliance of research carried out under the auspices of Carlow College with best ethical practice and data protection legislation. It is the responsibility of the researcher to ensure that they are familiar with, and adhere to, the relevant ethical codes of their field of research; for example, in psychology the PSI *Ethical Code of Research Conduct* 2019, for historians the Oral History Association's *Statement on Ethics*, and for Social Care research, the Social Care Workers Registration Board *Code of Professional Conduct and Ethics* 2019. Researchers should also be familiar with the data protection legislation relevant to their research: the EU *General Data Protection Regulation (GDPR) 2016* and the *Data Protection Acts 1988 – 2018*, and any subsequent applicable legislation. Researchers engaged with 'health research' must be particularly aware of their responsibilities regarding informed consent as a consequence of the *GDPR 2016* and the *Health research Regulations 2018* which apply to all forms of health research (which is broadly defined) and came into legal effect on the 8 August 2018.[11]

Process for Applying for Ethical Approval for a Proposal

To meet REAC's responsibilities of oversight of the research carried out under the College's auspices and to ensure it complies with legislative requirements, relevant codes of ethics and best practice in the relevant field, REAC has developed two procedures for approval of research proposals; one for undergraduate and Level 9 taught Masters learners (see Appendix

[11] S.I.314 of the *Data Protection Act 2018 (Section 36(2))(Health Research) Regulations 2018.*

1), and another for research proposals developed by college staff and Levels 9 and 10 postgraduate learners carrying out their programme by research. This appendix deals with the latter.

Application process for Carlow College staff and Levels 9 and 10 by Research Postgraduate learners.

Postgraduate learners who propose to do research that involves human and / or animal participants are advised to discuss their proposed research informally with their Supervisor as the approval process entails the creation of a number of documents.

Staff and Postgraduate learners seeking approval for research that involves human and / or animal participants must submit the six documents described in the table below to REAC by the relevant deadline:

No	Document	Instruction
1	Ethics Checklist (see Appendix 2)	• The Checklist will require the researcher to consider issues of risk in relation to the participants, their chosen topic and themselves. • The Checklist should guide the development of the Research Proposal and be completed in tandem with the writing of the Proposal.
2	Data Management Plan (see Appendix 3)	This document should outline how the learner will store and share research data. The Guidelines should be considered when drawing up a Data Management Plan.
3	Participant Information Sheet (see Appendix 4)	This template may be used as a guideline.
4	Consent Form (see Appendix 5)	This template may be used as a guideline.
5	Indicative questions to be asked of research participants	Please provide a list of all indicative questions to be asked of research participants.
6	Proposal Summary (see Appendix 6)	Concise summary of the project with a description of the methodology, aims, risks, etc., included.

2. Decision Making Within the Committee

Decisions will be based on a majority decision with the Chair having the casting vote. For deliberations on staff and postgraduate applications, the Committee will invite specialists in the area onto the Committee to assist its deliberations. The Committee will also invite a participant external to the College to sit on the REAC Committee in these deliberations. The Committee shall consist of not less than seven (7) people in considering these applications. REAC will endeavour to respond within fourteen days following submission of proposals. Members of REAC will withdraw from deliberations when their own research or that of their student is being discussed and will play no part in the decision-making process

The Committee will determine whether a proposal:

a) requires resubmission to apply for ethical approval;

b) is granted ethical approval;

c) requires redesign and resubmission in order to qualify for approval; or

d) is denied approval.

Submission of research proposals must include all the required documentation. The Committee may require more information from the applicant or require a meeting with the applicant to clarify issues in the proposal. Where a research project changes substantially after application to REAC, a new proposal must be submitted to REAC. Minor changes must be notified to REAC in writing.

Timeline

The REAC does not have specified submission dates for Postgraduate (levels 9 and 10 by research) and staff applications for ethical approval. Researchers intending to apply to REAC for ethical approval should notify the Chair in writing of their intention to submit an application one month in advance of their submission. REAC will respond to the application within one month of a submission during academic term time.

Issues to be Addressed in the Ethics Approval Process

Researchers must demonstrate their consideration of a variety of moral issues in application to REAC; for example, researchers must address the issues of confidentiality and anonymity, the keeping and storing of data and information, the assessment and limitation of risk to participants and themselves and fairness and equity in selecting participants, in their documentation.

The process aims to ensure that all research carried out at Carlow College adheres to a high ethical standard. This is a shared endeavour. Before seeking ethics approval, researchers, learners and academic supervisors should review the code of ethics that will govern their particular research project. They should highlight the pertinent issues in relation to their own study. When completing their *Ethics Checklist*, all researchers should:

1. Identify the actual and potential ethical issues and risks in their research.

2. Offer an account of how ethical issues and risks will be addressed in the study.
3. Formulate procedures for dealing with these issues, in consultation with their academic supervisor or principal investigator.

During the subsequent research project researchers have a responsibility to:

1. Implement the procedures agreed by REAC.
2. Attend to ethical issues on an ongoing basis, including seeking feedback from participants.
3. Review and update their ethical procedures and if necessary, to return to REAC.

All supervisors and researchers at Carlow College are expected to familiarise themselves with the following:

Confidentiality and Anonymity

In relation to confidentiality and anonymity, REAC takes the view that learners should inform themselves of the guidelines relevant to their discipline. In general, data should be managed and used in such a way as to protect the confidentiality of the research participants.

In Social Care, and under normal circumstances, the researcher is expected to guarantee the greatest degree of confidentiality possible to all participants in their research. Blanket guarantees of confidentiality should not be given to participants as there may be the circumstances under which the learner may have to disclose to other individuals what the participant tells them without their permission. This might occur if the learner has a strong belief that there is a serious risk of harm or danger to either the participant or another individual (e.g. physical, emotional or sexual abuse, concerns for child protection, rape, self-harm, suicidal intent or criminal activity) or if a serious crime has been committed.

In some disciplines, such as oral history, it is usual to identify research participants in research outputs, however, research participants in other disciplines are not normally identified or identifiable in research projects. In exceptional circumstances the nature of the research may mean that it is not possible to guarantee confidentiality and anonymity to your participants (e.g. very rare and high-profile events, interviews with public figures, or participants with other unique identifiers).

If researchers intend to identify research participants in their dissertations, this should be notified to participants in the Consent Form and Participant Information Sheet. In all other circumstances, the researcher must do everything they can to protect the privacy of participants and ensure that it will not be possible for third parties to trace any information they provide to the learner back to the participant (without their permission). This guarantee of confidentiality and anonymity also extends to people whom the participant may talk about in interviews.

Where participants are identified or identifiable in research data, the data is personal data in accordance with Data Protection laws. On the contrary, if participants are not identified or identifiable, either because identifying information was not collected at all or the learner has taken steps to anonymise the data, then the data is not personal data and is not subject to

Data Protection laws. However, the learner still has ethical responsibilities under this Policy. If the identity of research participants is disguised but the data has not been fully anonymised, data may be referred to as pseudonymised. Detailed guidance on anonymisation and pseudonymisation is available on the website of the Data Protection Commission.[12] Researchers should take care when informing participants about how their data will be treated and refer to the Data Protection Commission guidance to ensure that they are using appropriate terminology.

Limitation of Risk

REAC acknowledges that some level of discomfort, stress or embarrassment and risk of harm to both participants and researchers may be unavoidable, but the researcher is expected to show that they have done everything possible to minimise such risk and discomfort. The researcher must also ensure that participants have been made fully aware of any potential risks or discomforts in advance so that they can make properly informed consent.

Researchers are also obliged to limit the risk of physical and psychological harm to themselves as much as possible – in the research context taking risks is not a personal decision. This includes taking proper precautions for their physical safety. Although it is not part of the ethical approval process for research with non-vulnerable populations and non-sensitive topics, researchers should be aware that research is by its nature intrusive and may uncover distressing material in completely unexpected ways. For their own benefit and the benefit of their participants it is recommended that all researchers consider how they will respond to distress should it arise in the course of researching their topics.

Particular care must be taken where research involves vulnerable participants, for example, those with disabilities, cognitive or communicative difficulties; child participants; those who are institutionalised (prison, residential care etc.); those with specific medical issues (for example mental health issues); or minority groups (e.g. members of the Travelling Community, non-English speaking persons). Prior to commencing work with vulnerable participant groups, researchers shall be compliant with the Carlow College *Garda Vetting Policy*.

Consent should be obtained where possible from the participant depending on their needs. Consent should also be obtained from key gatekeepers. The researcher needs to assess and reassess the participants' vulnerabilities and specific needs and take steps to protect participants. The capacity of the participant to give informed consent and participate in data collection methods should always be considered. Researchers shall comply with the provisions of the *Assisted Decision Making (Capacity) Act* 2015 when seeking consent from persons who are regarded as lacking capacity under s. 3 of the Act.

The methods of obtaining consent and data collection should meet the specific needs of the participant. Total confidentiality should never be given in research to any participants. All participants and gatekeepers should be aware of the limits of confidentiality and the researcher must document the steps taken to make these limitations clear to those involved

[12] See www.dataprotection.ie/en/guidance-landing/anonymisation-and-pseudonymisation for guidance document (accessed on 11 September 2019).

in the research and those giving consent. Should information of concern be disclosed during the research, researchers should inform a senior member of staff and follow the *Children First: National Guidelines for the Protection and Welfare of Children*, 2017[13]. The issues and the participants involved should be noted along with the decision-making process. This should be kept in writing and clearly documented.

Data Retention, Protection and Destruction

Research data refers to any and all recorded descriptive, numerical, or visual material collected and used in the conduct of research, irrespective of medium. It may include physical, and electronic records, digital images, microfilm, microfiche, audiotape, videotape, and photographs. Research data may be augmented by objects, specimens, and samples.

Research by which participants are directly identified (e.g. by name) or identifiable (e.g. if not named but by linking different bits of data) is personal data and both the learner and Carlow College are obliged to manage research data in accordance with Data Protection laws, including the *General Data Protection Regulation* (GDPR) and the *Data Protection Acts* 1988 to 2018. Researchers are to outline in the Data Management Plan how they intend to document their project, and store and share data. Researchers are to use the Data Management Guidelines (Appendix 3) to steer the content of their Data Management Plan.

Researchers must ensure that they obtain written consent from each participant from whom they gather data. Consent forms should treat of data collection, retention, sharing, storage and destruction. Safeguards that learners put in place to protect the security and integrity of the data depend on how sensitive the data is.

Personal data of participants must be kept safe and secure. To this end, electronic data should always be stored on secure servers and NOT on portable storage devices (e.g. USB flash drives, memory cards, laptops, video recorders, phones etc.) Where portable storage devices are used for initial collection of data, these data should be transferred to a secure server and deleted from the portable storage device as soon as possible.

Data should be stored on the college's Microsoft One Drive cloud storage only for as long as is necessary, having regard to the purpose of collecting the data. The time for which it is stored may be determined by a variety of considerations: legal requirements or requirements by particular professional associations and codes. It may also be influenced by funding requirements or by the requirements of publishers, in the case of publication. In all instances, participants should be made aware of how long their data is to be retained, and their consent gained.

[13] See *Children First: National Guidance for the Protection and Welfare of Children (2017)* at https://www.gov.ie/en/publication/114c50-children-first-national-guidelines-for-the-protection-and-welfare-of/

Appeals

When the decision of REAC results in approval for a research proposal being declined or requiring specific modification, the researcher may appeal the decision to the Chair of the Teaching, Learning & Assessment (hereafter TL&A) committee. The appeal must be in writing setting out the basis for the appeal. It must be received two weeks after the original decision was communicated to the researcher. The Chair of the TL&A committee may refer the appeal back to REAC for review or request a new panel of three members to review the proposal and make a recommendation. A response to the Appeal should be returned no later than one month after submission of the Appeal.

Research Integrity and Research Misconduct

In every situation where there is a complaint against a learner that may constitute a personal data breach, the Dissertation Coordinator or any other staff member who is aware of the situation must report the matter to the Data Protection Officer without delay in accordance with the College's *Data Protection Policy*.

Assessment of a data breach will be carried out under the College's Data Breach Response Plan, which is included in the *Data Protection Policy*. Staff relevant to research ethics and supervision of the leaner will be involved in the assessment of a reported data breach. Assessment of a data breach may occur in parallel with an investigation into the matter by other staff.

Where there is a complaint against the integrity of a researcher's work, this will be dealt with through the relevant disciplinary procedures of the Office of the Registrar (see Appendix 10).

Appendix 12: External Research and Carlow College

External Research and Carlow College

External researchers may apply to conduct research in respect of Carlow College staff or learners. Where research ethics approval has been obtained from an external research ethics committee a copy of the approval must be submitted to the REAC prior to the commencement of the study. REAC might request further documentation or clarification to inform their deliberations. Where REAC has concerns about the external research ethics committee's robustness or probity, it retains the right to ask external researchers to submit their applications for full ethics approval from REAC.

In the first instance, the external research proposal must be approved by a relevant management body (e.g. the Management Board, the Academic Council, the Office of the Registrar) as something the college would be interested in participating in. Once this approval has been granted, the proposal is then passed onto REAC.

The REAC deliberates on whether or not the research as described in submitted documentation may go ahead in Carlow College rather than approving the nature and means of the research. If REAC is unwilling to grant approval, then the research cannot proceed.

External researchers are wholly and solely responsible for compliance with all ethical and legal obligations, including compliance with Data Protection laws, and Carlow College accepts no liability for research conducted by external researchers.

Appendix 13: Approval Form for Dissertation Supervisors (to be submitted to REAC)

COLÁISTE CHEATHARLACH
NAOMH PÁDRAIG
CARLOW COLLEGE
ST. PATRICK'S

Approval Form for Dissertation Supervisors (to be submitted to REAC)

LIST OF STUDENTS WHO HAVE RECEIVED APPROVAL

Please complete the following form and submit to REAC by the assigned date.

Please note that data collection cannot proceed without ethical approval from the REAC.

Learner / Researcher Name	**Green Light**	**Orange Light**	**Red Light**

Supervisor: _____

Date: _____

Appendix 14: Research Misconduct Report Form

RESEARCH MISCONDUCT REPORT FORM

Directions:

This form should be completed in cases where a lecturer has engaged in research misconduct requiring a penalty. Once completed, it should be emailed to the Office of the Registrar and the relevant Programme Director and Academic Advisor.

Form:

Name of Learner	
Stage	
Programme	
Academic Advisor	
Name of Supervisor	
Dissertation Type and Title	
Summary of the type of misconduct	
Penalty Imposed	
Date	