

University of Sussex Research Ethics Policy

1. OVERVIEW AND PURPOSE

- 1.1 The University of Sussex is committed to upholding high ethical standards and integrity. This Research Ethics Policy sets out the core ethical principles that all members of the University must follow when undertaking research and research-related activities under the auspices of the University.
- 1.2 The policy seeks to protect the safety, wellbeing, rights and dignity of all researchers and research-related participants. It also serves to maintain public trust in the research undertaken at Sussex.
- 1.3 It is recognised that academic freedom and freedom of speech are fundamental to higher education and research. They allow for the exchange, within the law, of diverse beliefs, theories and opinions, and play a central role in innovation and discovery. They ensure that different voices are heard in debate and discussion, and they facilitate inquiry and study in a range of areas that are sometimes complex and controversial¹. Whilst the University does not seek to restrict any research that complies with the law and with regulatory expectations, it is important that research is conducted ethically and with appropriate safeguards in place, and is thus subjected to ethical review.
- 1.4 Nothing in this policy should be taken to justify sanctioning academic staff for questioning or testing received wisdom or putting forward new ideas including controversial or unpopular opinions within the law, nor should anything in this policy be taken to justify disproportionate restrictions on freedom of speech².
- 1.5 This policy outlines expectations on researchers at Sussex for seeking ethical review and aims to promote ethical awareness, to support a culture of openness and accountability, and to ensure regulatory and compliance obligations are met.

2. SCOPE

- 2.1 This policy applies to research and research-related activities as defined in [Supporting note 1 and 2](#) that present material ethical issues, including, but not limited to, those that involve the collection and/or use of data from human or animal participants or that involve direct interaction and consequence to the natural environment, society, culture, cultural heritage and/or traditional knowledge - [Supporting note 1-3](#).
- 2.2 This policy applies to all staff and students engaged in research and research-related activities within and/or for the University. This includes collaborators on University funded

¹ [University's position on Academic Freedom and Freedom of Speech.](#)

² [University Freedom of Speech Code of Practice](#)

projects, visiting and honorary staff, and consultants, as well as undergraduate (UG), post graduate taught (PGT) students, post graduate researchers (PGRs) and junior research assistants.

2.3 This policy must be considered alongside the accompanying document, University of Sussex Research Ethics Policy [Supporting Notes](#), which provides further definitions and details around the policy and its requirements.

2.4 This policy does not address wider ethical issues: see – [Supporting note 4](#).

3. RESPONSIBILITIES

3.1 Staff

3.1.1 All staff and students engaged in research or research-related activities are responsible for ensuring their awareness and compliance with this policy and ensuring that they adhere to any other applicable external governance, legislative, regulatory or other requirements, and that they utilise the ethical review processes of the University.

3.1.2 All staff and students engaged in research or research-related activities should complete research ethics training provided by the Research Ethics, Integrity and Governance (REIG) Team.

3.2 Supervisors and line-managers

3.2.1 Supervisors of students have a responsibility to ensure that they provide guidance to their supervisees in relation to this policy.

3.2.2 All line managers are responsible for ensuring that staff they line manage who are engaged in research or research-related activities are aware of this policy, and all staff are expected to promote a positive culture of compliance.

3.2.3 Schools have a responsibility to investigate allegations of breaches of this policy by UG and PGT students, under the University's Academic Misconduct policy and related procedures.

3.3 Professional Services Staff

3.3.1 The Director of Research and Innovation Services, Head of REIG, and the REIG team are responsible for ensuring that high standards of ethical practice, governance and legislative requirements are met by providing advice, guidance, training and policy. They are responsible for ensuring Professional Services (PS) support for the framework of ethical review, and for providing training and support both to those applying for review, and to colleagues appointed to carry out review.

3.4 Pro-Vice-Chancellor (Research and Innovation)

- 3.4.1 The Pro-Vice-Chancellor (Research and Innovation) is responsible for ensuring the highest standards of ethical practice are promoted and met, by working with PS and academic staff and for the promotion of these standards through the work of the University's Research and Innovation Committee (URIC). They are also responsible for ensuring that any non-compliance by PGRs or staff is investigated under the Procedure for Investigating Allegations of Misconduct in Research.

3.5 Research Ethics and Integrity Sub-Committee

- 3.5.1 The Research Ethics and Integrity Sub-Committee (REISC) is responsible for ensuring that the University upholds the highest standards of ethics, rigour and integrity in all aspects of research and that the University has robust frameworks, policy and guidance to enable compliance and best practice— [Supporting diagram 1](#). REISC reports to URIC, and URIC has oversight of all matters relating to research and innovation policy and strategy and provides assurance to Senate that the University is compliant with external requirements related to research and innovation. It drives the development of a research and innovation environment and culture that maximise the quality and impact of the University's research and innovation and enable the University's research community to flourish.

4. POLICY

4.1 Ethical principles

- 4.1.1 Ethical review by the University is undertaken to:
- Protect the health and wellbeing of participants (human and animal)
 - Protect the health and wellbeing of researchers
 - Consider environmental, societal and cultural impacts of the research
 - Consider equality, diversity and inclusion

This will maintain public trust in research and protect the reputation of the University.

- 4.1.2 Ethical review by the University seeks to ensure that:
- Benefits of the research outweigh any risks or harm
 - Risk and harm are mitigated as far as practically possible
 - Conflicts of interest are transparent and managed
 - Research participants give informed consent. In the very limited circumstances where this is not possible, for example covert or deception studies, the risks are considered, justified and managed
 - Research participation is voluntary and the risks are considered in the very limited circumstances where this is not possible
 - Participants are free to withdraw from the research without consequence and they are informed of any timeframe for withdrawal. In the very limited circumstances where withdrawal is not possible, this should be clearly explained to participants in advance

- Safeguarding of those involved in research or research-related activities is considered and appropriate pathways for reporting are identified
- Research protocols adequately address the privacy and confidentiality of participants.

4.2 Ethical review requirements

4.2.1 Ethical review of research is required for:

- Research involving human participants
- The collection and/or use of material derived from humans
- Access to, collection or use of personal data or property, including mass data collected online (including from social media platforms)
- Access to, collection of or use of non-personal sensitive or confidential data
- Research with the potential to expose any person, whether participating in the research or not, to physical or psychological harm
- Research with the potential to cause a significant negative impact or damage to the environment
- Research involving animals, including both research covered by the Animals (Scientific Procedures) Act 1986 (ASPA) and non ASPA governed research involving animals and when relevant frameworks exist, to include research involving material derived from live or deceased animals
- Research involving genetic material and the local or traditional knowledge relating to the genetic material
- Research exploring or involving illegal activities, requiring access to or handling of materials related to illegal activities and/or research that could lead to the disclosure of information that could facilitate illegal activities

4.2.2 Security sensitive research (which may include research with export control, sanctions and/or Foreign Influence Registration Scheme requirements) that has a requirement for ethical review as listed in 4.2.1 may require additional sign off by the Executive Dean or delegate – [Supporting note 5](#).

4.2.3 The above list is not exhaustive and the REIG team should be consulted to determine the position where there is any uncertainty as to the requirement for ethical review.

4.3 Ethical review framework

4.3.1 The University ethical framework for review takes into account whether the applicant is a member of staff or student (including level of study) – [Supporting note 6](#).

4.3.2 The framework also takes into account the level of risk, noting that research is filtered to follow either a low risk or a high risk pathway. – [Supporting note 7](#).

4.3.3 All staff and PGR applications for ethical review must be submitted on the University's online ethics management system for governance review – see 5.1, and must be given a favourable

ethical opinion by a Faculty Research Ethics Committee (F-REC) before commencement of research. All UG and PGT applications, following ethical review by the Supervisor, must be submitted on the University's online ethics management system and given a favourable ethical opinion by a School Research Ethics Officer (SREO) where the application is low risk, before commencement of the research. Where the application is high risk, it must be given a favourable ethical opinion by the Supervisor, an SREO, plus one member of the F-REC before commencement of the research – [Supporting note 6-8](#).

F-RECs and SREOs will make their decisions informed by the ethical principles outlined in this policy.

4.4 Sponsorship

- 4.4.1 Research requiring sponsorship and external approvals, such as from the Health Research Authority, NHS Research Ethics Committee, Medicines and Healthcare products Regulatory Agency, His Majesty's Prison and Probation Services (HMPPS) National Research Committee, Ministry of Defence Research Ethics Committee (MOD REC), must follow the appropriate approval route for the University – [Supporting note 9](#).

4.5 Animal research

- 4.5.1 Research involving animals will be reviewed by the Animal Welfare and Ethical Review Board (AWERB) for those falling within scope of the ASPA, and the Applications Review Group (ARG) for non-ASPA animal research. The AWERB and the ARG consider applications within scope of the ASPA and non-ASPA animal work.

4.6 Large data studies

- 4.6.1 Large data studies, including the collection and analysis of mass data from internet sources inclusive of social media, will be reviewed by the F-RECs and specialist governance reviewers – [Supporting note 10](#).

4.7 Ethical review requirement for collaborative research

- 4.7.1 In UK collaborative research, the University would normally expect ethical review to be undertaken by the lead institution and the University would not seek to unnecessarily duplicate review. However, the University would expect to see a copy of, and confirm the adequacy of, the ethics approval from the lead institution upon request on a collaborative project. The researcher must still ensure that the research is compliant with this policy. – [Supporting note 3 and 11](#).

4.8 Overseas governance compliance

- 4.8.1 The University would expect researchers conducting research or research-related activities overseas to ensure work is in compliance with local legislation, governance arrangements,

standards and culture. Where a researcher is conducting research individually, or Sussex is the lead institution, they will be expected to comply with the University's requirements and with local legislation, governance arrangements, standards and culture.

4.9 Additional sign-off for undergraduate research

- 4.9.1 There are some types of research that may be particularly challenging for UG and PGT level study because of the potential impact on the participant and/or student undertaking the research. Projects of this nature may require sign-off by an Executive Dean or delegate in advance of submitting an ethics application for review– [Supporting note 12](#).

4.10 Research-related activities

- 4.10.1 Research-related activities undertaken at the University that may pose ethical questions include audit, service evaluation, professional practice, research impact activities and knowledge exchange activities. Approval for these activities must be sought and obtained by staff and PGRs if they are deemed to be more than low risk; in accordance with the policy guidance notes they will be managed as high risk. For UG and PGT students, research-related activities involving human or animal participation must still receive ethical approval even if they do not meet the threshold of high risk, unless they are taking place within the NHS and comply with local NHS governance arrangements – [Supporting note 13 and 14](#).

4.11 Changes/ Amendments to a project

- 4.11.1 Changes/ amendments to a project must be submitted and approved by the relevant framework for approval and approval granted prior to the change taking effect – [Supporting note 15](#).

4.12 Non-compliance and unexpected issues

- 4.12.1 No approval may be granted retrospectively for data collection that has taken place in the absence of ethics review and such data collection may be investigated under the Procedure for Investigating Allegations of Misconduct in Research.
- 4.12.2 Failure to adhere to this policy will be dealt with under the Procedure for Investigating Allegations of Misconduct in Research, the Undergraduate Progression and Award Regulations, and Postgraduate Progressions and Award Regulations, together with the staff and student disciplinary procedures where appropriate.
- 4.12.3 Any unexpected ethical issues that arise during the course of the research or research-related activity should be discussed with the REIG team and the F-REC or SREO that granted the favourable ethical opinion.

5. LEGISLATION AND GOOD PRACTICE

5.1 Governance review is undertaken within the ethical review framework through screening of applications via the online application management system and the REIG team to:

- Ensure the correct pathway for ethical review is followed
- Identify external governance or regulatory requirements
- Identify legislative requirements
- Signpost to relevant governance and regulatory teams when necessary

5.2 Relevant legislation, regulation and governance include but are not limited to;

- [UK Policy Framework for Health and Social Care Research](#)
- [Mental Capacity Act 2005](#)
- [Mental Capacity Act - Health Research Authority](#)
- [His Majesty's Prison and Probation Services \(HMPPS\) National Research Committee](#)
- [Ministry of Defence Research Ethics Committee \(MOD REC\)](#)
- [Nagoya Protocol](#)
- [Trusted Research Campaign](#)
- The Data Protection Act 2018
- The UK's General Data Protection Regulation, and any Codes of Practice issued by the Information Commissioner's Office
- Human Tissue Act 2004 and [Human Tissue Authority Codes of Practice](#)
- Animals (Scientific Procedures) Act 1986
- [Health and Safety at Work etc. Act 1974](#)

Review / Contacts / References	
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Division / School:	Research and Innovation Services
Policy owner:	Prof. Keith Jones, Pro-Vice Chancellor, Research and Innovation
Point of Contact:	Dr Caroline Gordon, Head of Research Ethics, Integrity and Governance
References and acknowledgements	¹ University's position on Academic Freedom and Freedom of Speech. UK Research Integrity Office