



THE UNIVERSITY
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Ethics governance at Scottish universities

How can we do better?

Policy brief

July 2022

Overview

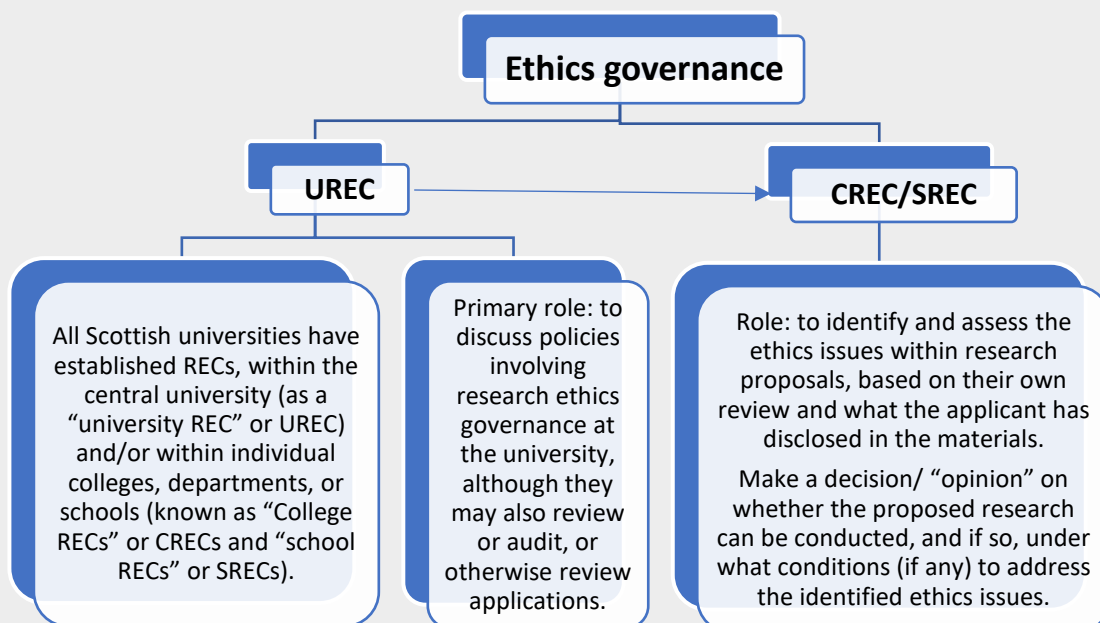
- ☞ Research Ethics Committees (REC) are vital components within universities and a key part of their research environment.
- ☞ RECs have a definitive role in assuring that research is conducted in an ethical manner.
- ☞ Almost all forms of research conducted by staff and students at universities require ethical oversight in some manner by a REC, but recognising ethical issues is the responsibility of everyone.

Yet there is still **little understanding about how university RECs operate and what support they and their members might need for to operate** smoothly, effectively, and with broad support.

Major funders (e.g., UK Research and Innovation/Economic and Social Research Council; British Academy; Wellcome), as well as non-medical journals, now require proof of approval from a designated REC as a pre-requisite of their funding/publishing.

This policy brief draws on findings from a qualitative research project funded by the Carnegie Trust for the Universities of Scotland. The project was conducted at Edinburgh Law School and led by Dr Edward Dove. Recommendations for improvement were informed by all empirical findings, including from REC members and administrators who were interviewed as part of the project. An end-of-project roundtable provided further opportunities to refine the recommendations. As such, the recommendations in this brief are meant to open a **dialogue with stakeholders across government, funders, policymakers, and universities** who hold decision-making and planning capacity for the research environment.

Ethics governance at Scottish universities



Shorter term areas of need, support, and improvement

Immediate and urgent

Online operating system for research ethics governance

Current state

- ☞ The hierarchy and structure of RECs, their remit, their operational system, and what REC members consider to be the content of their review **vary significantly** across Scottish universities.
- ☞ There is a **strong consistency**, though, in how REC members learn how to do the review effectively, their overall perception of the system, as well as their suggested areas of improvement.
- ☞ Despite the variation mentioned above, overall, **RECs across Scottish universities perform well and are fit for their stated purpose.**
- ☞ At the same time, there are certain **areas of need, support, and further improvement.**

- Universities that use an online system for RECs to undertake their work help enable a smoother and are more efficient environment in terms of:
 - ✓ Triaging applications;
 - ✓ Allocating reviews;
 - ✓ Reviewing applications and returning comments to applicants; and
 - ✓ Communicating with the applicants.
- Despite persistent efforts to acquire an online system, some RECs still operate systems that are **paper-based/via email attachments of documents and correspondence.**
- This adds **unnecessary burden** to reviewers, as well as applicants, and often results in a longer time for approval and/or administrative resource waste.
- So far, the acquisition and making sure the system is fit for purpose has generally been the result of **individual members** (e.g., REC administrators).
- There are indisputable benefits of operating using an online system, both for REC reviewers and applicants. Investing and acquiring an online operating system would not only offer the practical support to universities RECs, but would also prove their commitment to facilitate the research agenda.

Recommendations

- ⇒ Universities should prioritise and invest in online operating systems for their RECs.
- ⇒ **Higher structures within the university (e.g., university senate, university research committee) should take a top-down approach in investing and working with information governance in obtaining an online operating system for their RECs.**
- ⇒ This approach helps to ensure institutional buy-in to the acquisition and effective operation of an online system, also promoting its sustainability even when staff changes occur.

Immediate, but not urgent

Remit clarification and more research governance support

Current state

- RECs perform well in undertaking their required duties even when these might fall outside of their remit. However, there is much need to clarify and declutter their remit.
- Historically, RECs provide a kind of academic peer review regarding possible ethical implications of research proposals.
- More recently, though, the content of REC reviews has been complicated by legislation that impacts much on university research, including the UK General Data Protection Regulation (UK GDPR) and Data Protection Act 2018, as well as additional complexities about what might constitute research data.
- Many universities across Scotland already have research governance teams/offices in place. However, there is not always effective communication and/or harmonisation between research governance and research ethics in universities. And, in the absence of robust research governance structures, many RECs become the de facto sites of governance and document repositories for all research-related matters within universities.
- This results in confusion about REC remit, unnecessary bureaucracy, and anxiety in giving REC approval without additional review of e.g., data protection and information storage by relevant experts within universities, such as data protection officers and information governance managers.

Recommendations

- ⇒ Universities should work towards ensuring that there are robust research governance structures in place that *realistically* address the practical research aspects that are not directly related to ethics issues, such as insurance, data protection, and information management.
- ⇒ **Research governance should operate as a one-stop shop that handles all research governance-related matters of a proposed research project, with research ethics review devolved to those committees that engage only in assessment of ethics-related issues.**
- ⇒ **RECs should not be used as a place where research documentation is centralised.**
- ⇒ Research governance offices should ensure that all documentation is centralised within their system and that there is harmonisation between different departments/committees' reviews to avoid diffused responsibility, duplicating reviews, or gaps in research approvals.
- ⇒ REC members should be supported to feel fully confident that their role lies only in the area of ethics review. At the same time, they should be reassured that other research-related issues that might create reputational risk (e.g., data handling; data protection, insurance) are reviewed, addressed, and approved by competent experts in the area, ideally within a centralised unit at the university.

Longer term areas of need, support, and improvement

Overall research ethics system

Current state

❖ External or lay members

- The ESRC research ethics guidance framework recommends as good research practice that each REC has external or lay members.
- What is understood by 'external' or 'lay' members varies across Scottish university RECs: these terms could be used interchangeably, but they can designate a retired academic, an academic from a different institution, or someone outside academia with some form of ethics understanding (e.g., teacher; member of hospital clinical ethics committee).
- Not all RECs across Scottish universities have external or lay members.
- There is strong agreement that external or lay members bring a lot of value to the overall performance of RECs. At times, this could be asking questions about how the system works, which puts under further scrutiny how certain things are done and might push for further clarifications/improvements.
- As external or lay membership is voluntary and unpaid, it can be difficult at times to find people willing to serve in this capacity.
- As public involvement in research becomes more the norm of good research practice, the representation of the public within REC memberships would create a balance in terms of research relevance and approach.

❖ Student representative

- Not all RECs have a student representative to act as a liaison between REC and the undergraduate/postgraduate cohort.
- Yet this role can significantly contribute to a culture of trust and dialogue in the very early stages of an education/research career, as RECs often engage with queries from the student community.

❖ Consistency across various RECs within same university and internal improvement

- School/college RECs annual reports and audit (i.e., random checks of individual applications within a certain REC) constitute the main way of ensuring there is consistency across university in terms of ethics review and approvals.
- There is no established practice of requesting feedback from applicants regarding their experience with REC, although the project found expressed interest in developing it.

Recommendations

❖ External or lay members

- ⇒ RECs should appoint at least one external or lay member. The external or lay member can be recruited via an open call for interest in a similar manner to NHS RECs/HRA or using REC members' extended networks (i.e., snowballing.)

❖ Student representative

- ⇒ As a minimum, all university RECs should have at least one student representative.
- ⇒ Research postgraduates should represent the student community by volunteering to serve as REC members or reviewers, supported with appropriate training and oversight. This could contribute to an early understanding of the research ethics environment, as well as instilling an awareness and appreciation of the ethics culture in the early stages of a research career.

❖ Consistency across various RECs within same university and internal improvement

- ⇒ RECs should have a feedback process to capture evidence about experience of working with the REC. This should be used for further improvement of the system, as well as giving applicants the opportunity to exercise influence over the whole process of ethics review and help to ensure that it works optimally in the interests of the research community.

Institutional support for REC membership

REC membership

Current state

❖ Workload allocation

- Ethics review and related REC membership duties are very time consuming, but in most universities, members have little recognition in terms of workload allocation.
- Many REC members perform their REC-related duties either in their free time or by taking time away from other academic tasks, including teaching and their own research. In an already overloaded work environment, being a REC member adds even more burden.
- Addressing this issue would prove universities' commitment towards making academia a fairer workplace, as well as formally recognising the importance of RECs in the overall research ecosystem and in Scotland's world-leading academic research environment.

❖ Career advancement

- While ethics review and being a REC member requires specific knowledge and expertise, there is little recognition of the role as a component in promotion and career advancement.
- This situation might end up with fewer REC members amongst early-career or those still working towards their career advancement, diminishing the diversity of views and perspectives represented in the REC decision-making process.

❖ Experience exchange and training opportunities

- Many REC members apply their skills as reviewers by harnessing their own previous experience and learn how to become a REC member by reading materials, attending in-person or virtual training sessions (to the extent offered by universities), and by observing other members.
- Although most universities offer some training modules for their REC members, we consider there to a need for greater experience exchange and more training opportunities beyond introductory-level ethics modules.

Recommendations

❖ Workload allocation

- ⇒ As each university and each school/department have different profiles, it should be decided locally how much time REC members allocate for performing their tasks. Nonetheless, in all cases, this work should be recognised in each member's workload allocation.

❖ Career advancement

- ⇒ Universities should take into account REC membership along other measurements, especially because REC membership can be counted as mentorship and building up expertise.
- ⇒ Recognising REC membership towards promotion could also encourage early-career or researchers who are still working towards career advancement to express interest in becoming REC members.

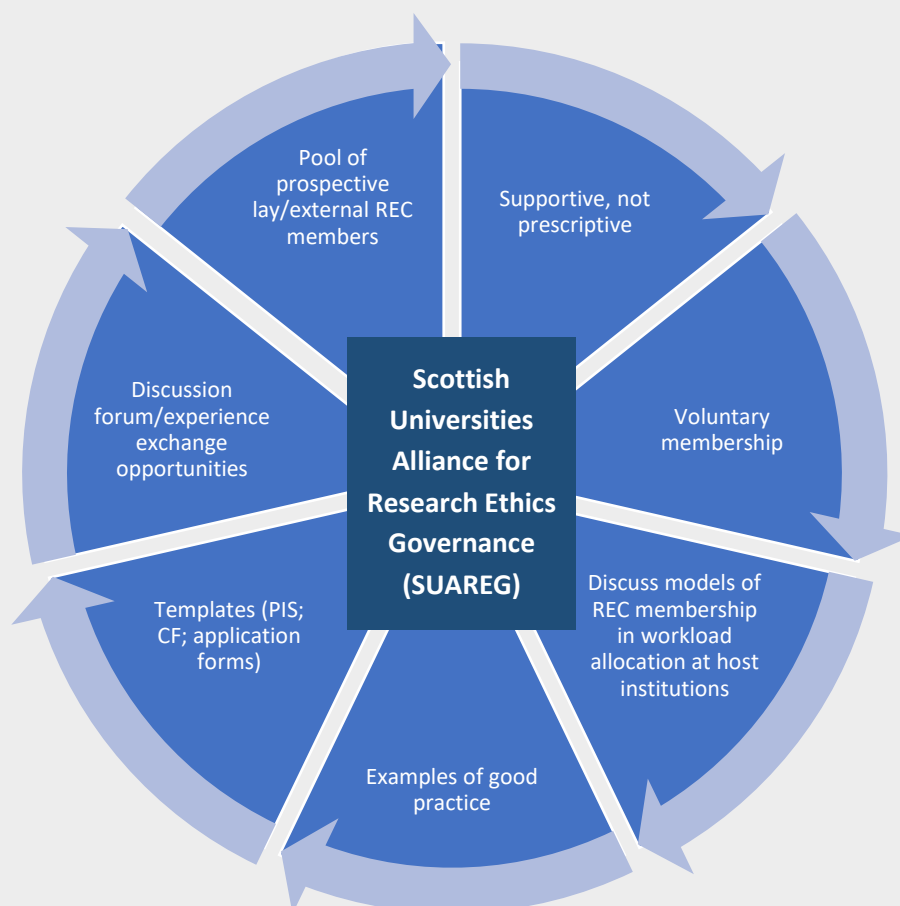
❖ Experience exchange and training opportunities

- ⇒ We recommend that universities should invest more in training opportunities (virtual and/or in-person) and experience exchange for REC members by supporting efforts of organising roundtables or collaborative networks. Professional growth in the role of REC members should be recognised and supported as an integral part of the research agenda.

Conclusions and ways of moving forward

Although RECs across Scottish universities perform well overall, there are areas of improvement that can make the process of ethics review smoother and more efficient, and which can make REC membership more equitable and supported as a core part of professional growth.

- ☞ In addition to the above recommendations, we propose a collaborative network of REC members and research governance officers across Scottish universities. Ideally, this would be supported and funded by an organisation that represents all Scottish universities through funding and policy development, e.g., Scottish Funding Council and Universities Scotland.
- ☞ The collaborative network that we propose has the benefits of: being supportive rather than prescriptive as its agenda would be decided by its members rather than external decision-makers; offer examples of good practice; identify mutual learning opportunities; share templates of supporting research documentation such as Participant Information Sheets or Informed Consent forms, as some universities might have more experience with certain categories of participants (e.g., children).
- ☞ In addition, the network that we propose can address the improvements we identified and recommendations that we have made above: e.g., create a pool for prospective external or lay REC members as they can be difficult to identify; offer opportunities for experience and expertise exchange; discuss models of building REC membership in workload allocation at various universities.
- ☞ Such a collaborative network could be the first of its kind that would offer a model of peer-academic support across Scottish universities and beyond.



Key contact for further information

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