

APPENDIX A: RESEARCH ETHICS POLICY

Policy	Research Ethics Policy
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Links to other internal policies / procedures	<ul style="list-style-type: none"> • Research Ethics Procedures • Academic Regulations - Section 10: Academic Integrity • Policy & Procedures for Investigating Allegations of Misconduct in Research • Fitness to Practise Policy • Staff disciplinary procedures • Student Code of Discipline • Code of Good Practice for Research • https://www.leedsbeckett.ac.uk/research/research-and-information-governance/research-policies-and-protocols/ • Statement on the Responsible use of Research Metrics • Due Diligence Policy
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Research Ethics Policy

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1. Introduction

- 1.1 Leeds Beckett University recognises the importance of maintaining public confidence in the ethical quality of approved research conducted by staff and students of the University. The University seeks to achieve this through raising awareness of ethical issues through debate and by formulating codes, policies, and procedures to ensure that ethical, social, and environmental issues are embedded throughout its activities.
- 1.2 This Policy sets out the general principles that underpin the University's approach to research ethics and should be read in conjunction with the [University's Code of Good Practice for Research](#) which sets out the standards of good research practice and principles to be understood and observed by all University employees and students.
- 1.3 The Policy should be used in conjunction with the University's Research Ethics Procedures.
- 1.4 This Policy is aligned with the University's Strategic Planning Framework 2021-26. In particular, research ethics is underpinned by the key themes of 'An Excellent Educational Outcome' and 'Excellent Research & Innovation'. It also aligns with our University Value of 'Integrity'. The Policy contributes to the promotion and maintenance of scholarly ethics throughout the curriculum; and in particular to setting standards for an ethical culture of respect and dignity throughout the research process, conducted both within the University and through research projects in which staff and students engage with the wider community.
- 1.5 The Research Ethics Policy is aligned with the principles laid out in other relevant University policies, guidelines and codes of conduct, and has been benchmarked against the guidance produced by the [UK Research & Innovation \(UKRI\) Research Councils](#), the [UK Concordat to Support Research Integrity](#), the [UKRIO Code of Practice for Research](#), and the [UKRIO/ARMA Research Ethics Support and Review in Research Organisations](#)

2. Purpose and Scope

Purpose

- 2.1 This Policy provides a framework for decision making on ethical issues. It aims to safeguard and protect the rights of University researchers and research participants.
- 2.2 The purpose of ethical approval within the University is to:
 - a) Reflect the University's commitment to good ethical practice, as a principle in itself and as a means of maintaining public confidence in the work of staff and students of the University.
 - b) Outline the provisions for ethical approval and assist researchers, supervisors and students undertaking research to identify appropriate issues, and to address these in the structuring of research proposals. Appropriate ethical development in the University across subject boundaries is a necessary concomitant of this continuing good practice.
 - c) Act as a safeguard to researchers, supervisors and students who can be confident of the ethical propriety of their project once it has been approved. The University's Insurance and

Indemnity Policy requires that all research projects receive ethical approval prior to any data collection being carried out (this does not preclude the need for certain projects to be referred individually for confirmation of cover).

Scope

- 2.3 This policy applies to:
- a) All University employees engaged in research.
 - b) All Students of the University.
 - c) Other individuals who are undertaking research using University premises or facilities and/or in the University's name.
- 2.4 All research requires either ethical approval or an assessment to be undertaken to confirm that ethical approval is not required. Researchers and supervisors overseeing the research projects of students have a responsibility to consider whether their student's research needs ethical approval or whether their student's research will involve matters excluded from the approval process.
- 2.5 The University has research ethics approval procedures in operation at supervisor, local, School and University level, and all research projects conducted by staff or students of the University require approval at the relevant level.
- 2.6 The University recognises that statutory, professional, regulatory, or other bodies may have requirements which also need to be met before a research proposal may be approved, however, all University research proposals must still adhere to this Policy. Advice should be sought from the Chair of the Research Ethics Sub-Committee if requirements of the University Policy contradict those of a statutory, professional, regulatory, or other body.

3. Responsibilities

- 3.1 The University expects all researchers to consider the ethical implications of their research and to be aware of their responsibilities to society, the environment, their profession, the University, research participants and the organisation(s) funding the research. All research conducted in the University must be conducted in accordance with Leeds Beckett Research Ethics Policy and Procedures.
- 3.2 It is the responsibility of all staff and students engaging in research to adhere to the highest standards of research integrity and to conduct their research in accordance with the ethical requirements of professional and regulatory bodies.
- 3.3 It is the responsibility of Research Leads to promote an environment which fosters and supports research of high ethical standards, mutual co-operation, and the open and honest exchange of ideas.

4. Definitions for terms used in this Policy.

- 4.1 **Employee of the University:** All colleagues at all levels and grades (whether permanent, fixed term or temporary), visiting research or teaching staff, staff of subsidiary University companies, workers, trainees, seconded staff, agency staff, agents, volunteers, interns, independent contractor or consultant or any other person conducting research under the auspices of the University, whether solely or in conjunction with others in the University or other bodies or in conjunction with other bodies working in any context within the University.
- 4.2 **Research:** The Research Excellence Framework ([Research Excellence Framework 2021, Assessment framework and guidance on submissions, Annex C](#)) defines research in the following terms:
- a) Research is defined as a systematic process of investigation leading to new insights, effectively shared.
 - b) It includes work of direct relevance to the needs of commerce, industry, culture, society, and to the public and voluntary sectors; scholarship; the invention and generation of ideas, images, performances, artefacts including design, where these lead to new or substantially improved insights; and the use of existing knowledge in experimental development to produce new or substantially improved materials, devices, products, and processes, including design and construction. It excludes routine testing and routine analysis of materials, components, and processes such as for the maintenance of national standards, as distinct from the development of new analytical techniques. It also excludes the development of teaching materials that do not embody original research.
 - c) It includes research that is published, disseminated, or made publicly available in the form of assessable research outputs, and confidential reports.
 - d) This definition does not normally extend to general coursework assignments but does apply to final year undergraduate dissertations or projects.
- 4.3 **Student:** Any person who has registered on a programme of study with the University, which can include undergraduate, postgraduate taught and postgraduate research programmes. This also includes students from elsewhere visiting as part of an exchange or similar programme.
- 4.4 **Research Student:** Research students, who are registered for an MPhil, MRes, a PhD or a Professional Doctorate
- 4.5 **Anonymity:** When participation is anonymous it is impossible to know whether or not an individual participated and there is no way to determine the connection between individual participants and the results. In accordance with the ICO definition of 'anonymous information' the UK GDPR notes that anonymous information is information which does not relate to an identified or identifiable natural person or to personal data rendered anonymous in such a manner that the data subject is not or no longer identifiable.
- 4.6 **Pseudonymisation:** Pseudonymisation is different to anonymisation. Pseudonymisation is a technique that replaces or removes information that identifies an individual. For example, it may involve replacing names or other identifiers. Additional information in pseudonymised studies must be kept separately, and researchers are required to demonstrate that appropriate technical and organisational controls are in place to prevent any release of

information which would identify a participant. It must not be possible to re-identify any individual from the use of the separately held information - or from any other information.

- 4.7 **Confidentiality of Information:** Confidential Information means any and all information (which may be written, oral or in any other format) that is by its nature confidential (including information that relates to products, operations, systems, security, processes, procedures, tools, methodologies, utilities, know-how, plans, intentions, product information, market opportunities, business affairs, financial position, assets, liabilities, business strategies (including marketing, advertising and commercial plans), ideas and business projections of the research participants that is disclosed by them to the University either before or during the Research.
- 4.8 **Consent:** For consent to be valid it must be freely given, specific, informed and an unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her. The UK GDPR does not prevent a third party acting on behalf of an individual to indicate their consent. In such cases, researchers must be able to demonstrate that the third party has the authority to act on the participant's behalf, and that the third party was fully informed, and consent was freely given. This is most likely to be appropriate in cases where the individual lacks the capacity to consent and someone else has specific legal authority to make decisions on their behalf.
- 4.9 **Personal data:** Personal data' means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
- 4.10 Some of the personal data that researchers process can be more sensitive in nature and therefore requires a higher level of protection. The UK GDPR refers to the processing of these data as 'special categories of personal data'. This means personal data about an individual's:
- a) Race.
 - b) Ethnic origin.
 - c) Political opinions.
 - d) Religious or philosophical beliefs.
 - e) Trade union membership.
 - f) Genetic data.
 - g) Biometric data (where this is used for identification purposes).
 - h) Health data.
 - i) Sex life.
 - j) Sexual orientation.
- 4.11 Personal data can include information relating to criminal convictions and offences. This also requires a higher level of protection.
- 4.12 **Principal Investigator:** The lead investigator on a project, generally the main holder of research funding or institutional lead for a collaborative project.

- 4.13 **Risk assessment:** Any new research activity should be assessed for potential risks: to the researcher, research subjects (humans, animals & the environment), the general public, university's reputation, and financial and legal liability.
- 4.14 **Vulnerable participants:** Vulnerable populations include under 18s, people with learning or communication difficulties, patients in care, people in custody or on probation, and people engaged in illegal activities, such as drug abuse. A Vulnerable or At-Risk adult is an adult who needs community care services because of mental or other disability, age, or illness and who is, or may be, unable to protect themselves against significant harm or exploitation.
- 4.15 **Research ethics:** Research Ethics are the moral principles guiding the planning and conduct of research, the publication of outcomes, and post-project care and/or disposal of records or materials.
- 4.16 **Research with human participants:** This should be taken in its broadest possible sense and includes questionnaires, observations and the use of materials derived from human participants as well as invasive or intrusive procedures.
- 4.17 **Data Protection Laws:** Data Protection Laws means:
- a) Any law, statute, declaration, decree, directive, legislative enactment, order, ordinance, regulation, rule or other binding restriction (as amended, consolidated or re-enacted from time to time) which relates to the protection of individuals with regards to the processing of personal data to which an individual undertaking Research is subject, including the Data Protection Act 2018 ("DPA"), the UK GDPR (in section 3(10) (as supplemented by section 205(4)) of the DPA), the Privacy and Electronic Communications (EC Directive) Regulations 2003 and all legislation enacted in the UK in respect of the protection of personal data.
 - b) Any code of practice or guidance published by the ICO (or equivalent regulatory body) from time to time.

5. [Policy Statement](#)

- 5.1 The University requires that all research carried out at all levels within the University is conducted according to high ethical standards and complies with the legal requirements of the UK, and/or the country of location of the research project.

Principles of Ethical Research

- 5.2 The University's research practice, ethics and integrity policies and guidance are designed to ensure that research is conducted according to the highest standards. It is the responsibility of all researchers and colleagues supporting research to understand how to undertake research that:
- a) Has a benefit to society, either directly or by generally improving human knowledge and understanding.
 - b) Minimises risk to individual participants, researcher, our organisation, or associated partners.

- c) Is conducted honestly and transparently.
- d) Is accurate and accessible.
- e) Protects its participants, ensuring safety and wellbeing.
- f) Follows relevant data protection and management requirement.

5.3 The main principles are:

- a) Research should be designed, reviewed, and undertaken to ensure integrity, value, and quality.
- b) The results of research should benefit society either directly or by generally improving human knowledge and understanding.
- c) Researchers must, where applicable, ensure their proposed research projects follow the ethical guidelines of an appropriate learned society recognised by their School. Schools will be responsible for identifying appropriate learned societies with ethical guidelines and the University Research Ethics Sub-Committee will review and approve societies as requested by Schools.
- d) Research projects with human participants should aim to avoid or minimise harm in general to groups and individuals. Risk assessment appropriate to each research project will be undertaken.
- e) Participants should be fully informed about the purpose, methods, and intended possible use of the research. Where there are exceptions to this, the purpose and rationale of such research projects will be fully considered, as appropriate, before approval is given.
- f) Research participants must participate in a voluntary way, free from coercion.
- g) The interests of research participants should be considered at all stages of the research projects. In particular the following should be observed, where appropriate to the project and in line with learned society practice:
 - Participants should be no worse off as a result of their participation in the project.
 - Provisions for withdrawal from the project should be in place.
 - The interests of children, vulnerable adults and other vulnerable groups should be given specific consideration.
 - Participants should not be subjected to undue intrusion, distress, indignity, physical discomfort, personal embarrassment, or other harm.
- h) The confidentiality of information supplied by participants must be respected, except where the requirements of professional and learned society practice determine. Any limits to confidentiality must be explained to participants.
- i) Issues of anonymity, anonymisation, and pseudonymisation of results should be fully considered, and where personal disclosure or identification is likely, this must be discussed with the participants and their specific consent to this obtained.
- j) Researchers should ensure that the research methodology is appropriate. Research designs should be such as to maximise a project's utility and relevance for the benefit of

society.

- k) Research outcomes should be disseminated in a manner which makes them accessible.
- l) The independence of the research outcomes must be ensured. External sources of funding and any potential conflict of interest must be declared during the approval process.
- m) The research culture will be characterised by respect for all groups in society, in line with the University's Equality Policy and national legislation on Equality, Diversity and Human Rights.
- n) The health and safety of both researcher and participants/subjects will be carefully considered in the design and execution of research projects.

5.4 Researchers, Research Officers, and Research Ethics Committees should consider ethics issues throughout the lifecycle of a research project and promote a culture of ethical reflection, debate, and mutual learning. The lifecycle of research includes the planning and research design stage, the period of funding for the project where applicable, and all activities that relate to the project up to, and including, the time when funding has ended, or when the project is otherwise complete. This includes knowledge exchange and impact activities, the dissemination process – including reporting and publication – and the archiving, future use, sharing and linking of data.

Requirement for Ethical Approval

- 5.5 Any research project undertaken by those whom this Policy applies to must receive ethical approval **before** it takes place. This may be given at supervisor, local, School or University level, depending on the nature of the research proposal. It is the responsibility of the researcher to seek guidance on research ethics from their supervisor or the Local Research Ethics Co-ordinator.
- 5.6 Further ethical approval or re-approval may also be required should significant details change on commencement of the proposed research project.
- 5.7 The re-use of already collected data may require ethical approval due to its sensitive nature or if individuals can be identified from it.
- 5.8 Retrospective ethical approval cannot be granted. Research should not begin until ethical review has taken place and approval given. In line with sector best practice retrospective ethical approval will not be considered.
- 5.9 All research requires either ethical approval or an assessment to be undertaken to confirm that ethical approval is not required.

Ethical issues related to the Conduct of a Research Project

- 5.10 While it is important that ethical considerations are taken into account at the inception of a research project, it is also important that ethical considerations inform it throughout, up to and including the publication/dissemination of the research project.

- 5.11 All research must comply with the Data Protection Laws (as set out in paragraph 4.17 above).
- 5.12 All researchers (and for student research projects, the research supervisor) must take full responsibility for ensuring appropriate storage and security for all study information, including research data and consent forms. Students and staff must keep appropriately secure data records for the life of research projects and all researchers must incorporate a Data Management Plan, including a strategy for open data, into their ethical approval application. A Data Protection Impact Assessment (DPIA) may also be required for research where any new/or change in process where personal or special categories of personal information is used. Further information on DPIAs can be found via the following link [DPIA Guidance](#).
- 5.13 For taught course students the life of a project includes completion of all forms of assessment, including re-submission.
- 5.14 Any researcher who wishes to retain data beyond the life of a research project (e.g., for future research use) must gain ethical approval, with the appropriate consents, to do this and must store the data in a form that complies with the Data Protection Laws Data Protection Laws (as set out in paragraph 4.17 above).
- 5.15 All research must comply with the relevant university research policies as well as national and international policies and protocols for research that need to be considered and applied in our research practice and endeavour to ensure that it is ethical and abides by this Policy. Examples include: Statement on the Responsible use of Research Metrics; Due Diligence Policy for research overseas; Trusted Research; and the National Security & Investment (NSI) Act. Further information can be found on the [Research Information & Governance webpages](#).
- 5.16 It is the researcher's responsibility to abide by the terms of the ethical approval given. If the need for further ethical approval becomes apparent as the project develops, it is the responsibility of the researcher to apply for that further approval.
- 5.17 The School may monitor the progress of the research project to ensure compliance with the terms of approval.
- 5.18 Failure to comply with the terms of ethical approval for a research project, or failure to seek further approval if required, may lead to action for staff under the University's [Policy & Procedures for Investigating Allegations of Misconduct in Research](#) or for students under the [University's Academic regulations relating to Academic Integrity](#).

Ethical issues relating to Dissemination of Results

- 5.19 Researchers also need to ensure that dissemination and/or publication follows good ethical practice. Researchers should seek advice locally and follow appropriate learned society guidelines.
- 5.20 Researchers have a responsibility to take account of all relevant evidence and present it without omission, misrepresentation, or deception. Data and information must not knowingly be fabricated or manipulated in a way which might lead to distortion.

- 5.21 Work of other scholars or colleagues must be acknowledged. Professional standards need to be observed in attribution of authorship; acknowledgement of sources; correctness of references.
- 5.22 Fair attribution of authorship in a collaborative research project should be observed, with seniority of position not creating an automatic right to co-authorship. Honorary authorship is unacceptable. The order of authors should recognise their respective contributions to the work.

Process for gaining ethical approval

- 5.23 The general procedure for gaining ethical approval for a research project is detailed in the University's Research Ethics Procedures. Applications for ethical approval should be made via the University Online Ethical Approval System.
- 5.24 It is expected that simple, low-risk research projects not involving participants, or their data will be approved by research supervisors and all other projects will be approved at local, School or University level.
- 5.25 Detailed guidance on ethical approval is found in the Research Ethics Procedures document.

6. Appeals

- 6.1 If at any stage the application for ethical approval is likely to be rejected, this will normally be referred to the applicant with the deficiencies of the application identified, giving the applicant the opportunity of a further submission.
- 6.2 Where an application for ethical approval is not approved at supervisor or local level, the researcher has the opportunity to appeal to the relevant School research ethics review group or appropriate School Committee. The applicant and person(s) responsible for considering the application have the right to attend the meeting and speak to the issue.
- 6.3 Where an application for ethical approval is not approved by the School research ethics review group, the researcher has the opportunity to appeal to the University Research Ethics Sub-Committee. The applicant and a representative of the School have the right to attend the meeting and speak to the issue.
- 6.4 The decisions of the University Research Ethics Sub-Committee on matters referred to it are final and there is no further appeal mechanism.

7. Non-Compliance / Provision for Raising Concerns

Non-Compliance

- 7.1 The University expects that all research carried out in its name complies with the requirements and expectations of this policy and associated procedures. Where a research study or researcher is suspected to be in breach of this Policy and / or associated procedures, the University may take action at a local level to resolve this. Where the circumstances invoke

other policies of the University these may also be applied. This may include the following University regulations, policies, and procedures:

- a) [Academic Regulations - Section 10: Academic Integrity](#)
- b) [Policy & Procedures for Investigating Allegations of Misconduct in Research](#)
- c) [Fitness to Practise Policy](#)
- d) [Staff disciplinary procedures](#)
- e) [Student Code of Discipline](#)

Raising Concerns

- 7.2 In the interests of openness, good practice and the reputation of the University, members of staff and students of the University, and members of the public, are entitled to raise concerns about the correct ethical practices in research, and particularly in relation to compliance with research ethics. This can be done via the [Policy & Procedures for Investigating Allegations of Misconduct in Research](#).

Good Faith

- 7.3 It is expected that all concerns will be raised in good faith. Where this is the case, the person raising the concern(s) will be protected from reprisal or victimisation even if the concern is shown to be unfounded.
- 7.4 Where a complaint or concern raised is vexatious or malicious, the member of staff or student complaining may face disciplinary proceedings.

8. Security Sensitive Research

- 8.1 Researchers using security-sensitive research material should comply with the Universities UK document '[Oversight of security-sensitive research material in UK universities: guidance](#)'. Security-sensitive research material that falls within the remit of the Terrorism Act (2006) should not be stored on a personal computer; such material should be stored on specially designated university servers supervised by the Officers of the University Ethics Panel.

9. Prevent

- 9.1 All research taking place under the auspices of the University must also adhere to the revised '[Prevent Duty' guidance for Higher Education Institutions \(England and Wales\) \(updated April 2021\)](#)' and the procedures for students and staff working on sensitive or extremism-related research as set out in the University's Research Ethics Procedures.

10. Research Ethics Protocols

- 10.1 All Research Ethics related protocols that are associated with the Research Ethics Policy & Procedures will be monitored for currency during the biannual review of the Research Ethics Policy & Procedures. Where a Protocol's approval date is greater than 3 years, or it is found

to be out of date, it will be reviewed as part of the wider review of the Policy & Procedures so that any recommended Protocol remains in line with sector practice both legally and ethically.

11. [Equality, Diversity & Inclusion](#)

- 11.1 All research must have 'due regard' to our University's [Equality, Diversity & Inclusion Policy](#) which sets out our vision that our University will be a place where everyone feels respected, valued and supported to achieve excellence. This commitment exists alongside our legal and moral obligations to provide an inclusive environment for our colleagues, students and members of the public who may be affected by our activities
- 11.2 To ensure that the Research Ethics Policy does not impact negatively on any individual particularly those with protected characteristics an Equality Impact Assessment (EIA) will be carried out on a biannual basis.

12. [Dissemination](#)

- 12.1 This Policy shall be made available to all members of the University, colleagues and individuals that carry out work for and on behalf of the University. It will be published on the University's website.

13. [Monitoring & Compliance](#)

- 13.1 This Policy is subject to oversight by the University Research Ethics Sub-Committee which reports to the Research and Enterprise Committee. Minutes of all meetings and an annual report are provided to the Research and Enterprise Committee and the Research Ethics Sub-Committee will receive an annual report providing an overview of the activity from each School.
- 13.2 The School Research Ethics Forums that carry out the operationalisation of the Research Ethics Procedures at School level report to the appropriate School Committee so that it can maintain oversight of research ethics at the School-level.
- 13.3 School Research Ethics Forums have delegated authority from the University Research Ethics Sub-committee to make decisions on projects where the Local Research Ethics Co-ordinator cannot decide, but the project does not require a full University review. The operationalisation of these groups is driven by requirements of the School for research ethics and is not prescribed. School Research Ethics Forums are normally led by the School Research Ethics Co-ordinator and include all subject Local Research Ethics Co-ordinators in the School.
- 13.4 Terms of reference for the University Research Ethics Sub-Committee can be found via the following link: [University Research Ethics Sub-Committee](#)

14. Dissemination

- 14.1 This Policy will be made available to all colleagues, students, and individuals that carry out work for and on behalf of the University. It will be published on the University's website and staff intranet.

15. Key Contacts

- 15.1 Key contacts:

- a) Pro Vice Chancellor Research & Innovation:
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- b) Research Information & Governance Team:
ResearchInfoandGovernance@leedsbeckett.ac.uk
- c) Information Governance Team
[Information Governance Team \(leedsbeckett.ac.uk\)](mailto:Information Governance Team (leedsbeckett.ac.uk))