

# ETHICS POLICY

## 1. PURPOSE

The purpose of this policy is to:

1.1 Provide an academic ethics policy which underpins the conduct of the Athena Global Education's (AGE) academic activities to ensure these activities are conducted to the highest ethical standards.

1.2 Set out ethics principles and responsibilities, outline the ethics review policies and procedures that will be employed to ensure the ethical integrity of this work, and act as a signpost to other existing and relevant policies and procedures.

1.3 Ensure that academic freedom and endeavour are supported and maintained through proportionate levels of scrutiny in relation to the assessed risk arising as a consequence of the proposed academic activity.

This policy sits under the AGE's Ethics Framework and the policies contained in the Academic Manual.

## 2. SCOPE

2.1 This policy relates to the academic activities of research, enterprise, consultancy and teaching and learning. It does not apply to non-academic issues concerning business partnerships, procurement or investment. Responsibility for such issues sits with the Governance, Nominations and Ethics Committee of Council and the AGE Ethics Framework.

2.2 This policy applies to all AGE staff, students, visiting or emeritus staff, associates, holders of honorary and clinical appointments or contracts, contractors and consultants and others working on or off AGE platform or carrying out academic activities in the name, or on behalf of, the AGE, and across all subject disciplines and fields of study, including instances where the AGE is not the lead partner.

2.3 This policy applies all staff members or students who undertake academic activities on AGE platform but not in the name of the AGE. These individuals are expected to adhere to the principles, standards and procedures outlined in this policy and related procedures, even if ethics review and approval has been undertaken by their home institution.

### 3. POLICY STATEMENTS

#### 3.1 Commitment

As set out in our Charter, *“the object of AGE is to advance education and knowledge by teaching and research, and in doing so to foster an academic environment which is enterprising and applied to business and the professions, for the benefit of society at large.”*

AGE is committed to fulfilling that purpose only in ways that comply with broad obligations to social responsibility, including the protection of human rights, civil liberties, the natural environment and health and wellbeing, maintaining and promoting the highest standards of integrity rigour, honesty and transparency in its creation, advancement and dissemination of knowledge and learning, and all related academic activities.

#### 3.2 Principles of a good ethics standard

In addition to the principles and ethical requirements set out in the AGE’s Ethics Framework, the following principles apply to the management of participation in any academic activities undertaken by staff, students and individuals carrying out these activities on AGE platform, or in the name of the AGE.

This Academic Ethics Policy, and all related policies and procedures, align with both statutory and regulatory requirements, and also with the standards and codes of practice outlined by the professional bodies with whom we work on a general or subject-by-subject basis.

Whilst the AGE advocates proportionate and appropriate ethics review, there are a number of academic activities where ethics issues will need particular consideration.

3.2.1 AGE is committed to safeguarding the interests of staff, students, partners, participants and all others engaged with or affected by its academic activities. All academic activities are considered against the potential risks outlined in the context of current Health and Safety legislation, the AGE's Health and Safety policy and the potential vulnerability of participants. This principle takes into account a wide range of considerations, which must take precedence over academic, or any other factors or interests. These considerations include (but are not restricted to):

- o The dignity, interests, rights, safety and well-being of all actual and potential participants, observers and all others involved in the academic activity
- o The welfare and interests of those carrying out the activity
- o The welfare and interests of the AGE's partners and collaborators and the individuals associated with those organisations
- o Animal welfare
- o Cultural Heritage
- o The natural environment
- o The reputation of the AGE and the wider academic community.
- o The welfare and interests of the wider community

3.2.2 Academic activities should be designed, reviewed and undertaken in adherence to the appropriate standards of quality, integrity, ethical governance, and legal compliance. Where ethics review and approval are required, this must take place before the activity commences.

3.2.3 The confidentiality of information supplied by participants, and participants' right to anonymity, must be held in accordance with the Data Protection Act 1998 and the AGE's Data Protection Policy. Where applicable, consent procedures should make it clear that behaviours or activities which are of concern, are issues of safeguarding, or are potentially or actually illegal are discovered in the course of a project, may need to be disclosed to the proper authorities.

3.2.4 Those responsible for academic activities should plan in advance how potential incidental information relating to the welfare or interests of participants in academic activities, or third parties, are to be handled, in accordance with professional and legislative requirements. This plan should be considered as part of the formal ethics review.

3.2.5 All data and other materials from and about participants in academic activities will be collected, managed, processed, retained, stored, and disposed of, in accordance with current legislative requirements and the AGE Information Governance policies. Particular care must be taken when collecting, handling and storing sensitive, classified and/or personal data. Such data must be kept securely and protected from unauthorised, accidental or malicious access, supported by a clear and documented access control procedure for granting and revoking access to the data. This procedure must be considered as part of the formal ethics review process. All such data should be disposed of appropriately and securely at the end of their lifespan, in line with legal and funder requirements.

3.2.6 All those engaged with the academic activity must normally be informed fully about the nature, purposes, methods and intended possible uses of the activity, what their participation in the activity entails, and what risks and benefits are involved. This information should be accurate,

clear, and easily understood by the potential participant, who should have the ability to understand what is involved in their participation. Academic activities proposing variation from this principle may be approved only in very specific contexts in which the lack of proper information, or the inability of participants to comprehend the information, must be justified by the value of the activity. Evidence of the provision of information and participant acceptance must be kept in accordance with the Data Protection Act 1998 and any other regulatory or funder requirements.

3.2.7 AGE promotes inclusion of all those who may benefit from its academic activities, however particular consideration will be given to academic activity which involves:

- o Human subjects including gathering of data using interviews, questionnaires, observation and testing
- o The use of personal data from living and recently deceased people
- o Vulnerable, or potentially vulnerable groups including, but not restricted to:

- ☐ Children (under 18 years of age)

- ☐ People with learning or communication difficulties

- ☐ People for whom English is not their first language and/or people who are unable to understand readily the language used in the academic activity

3.2.8 Participants in academic activities must be able to consent to participate in a voluntary way, free from any coercion, undue influence, or manipulation. Use of inducements to encourage participation must be considered and approved as part of the formal ethics review process, and be carefully monitored as part of this process.

3.2.9 Participants in academic activities should be informed in advance of any controversial or sensitive materials or topics which have the potential to cause offence or distress, and be given the opportunity to opt out or view alternative materials.

3.2.10 Any conflicts of interest or partiality must be disclosed in accordance with the AGE's Management of Conflicts of Interest Policy. Publication of results or other outcomes of academic activities must be done fairly and with the public good taking priority over private interests.

3.2.11 The AGE does not prohibit academic activities involving any country, organisation or sector, however all academic activities should adhere to the AGE's Ethics Framework.

3.2.12 All academic activities which are of a controversial and/or security sensitive nature should follow the AGE's IT Acceptable Use Policy.

3.2.13 Ethics review and approval pathways will be determined by the nature of the proposed academic activity regardless of the type of the academic activity or level of study of the students involved. Teaching and learning activities will be reviewed through the Period Programme Review and Revalidation process and the Programme Monitoring and Enhancement Procedure.

3.2.14 The default position is that written consent is required from participants in academic activities, and/or their appropriate representatives. Where this is not possible, the method by which consent will be obtained, and/or the justification for exception must be reviewed and approved as part of the formal ethics review process.

## **4. ETHICS MANAGEMENT**

4.1 All academic activities (see 1.2) which involve the principles outlined in 3.2 should undergo formal ethics review and sign-off and must adhere to the AGE's Ethics Framework. Individuals

are required to determine whether their activities fall within the scope of this Policy, and where this is the case, the activities should be formally reviewed and signed off through the AGE's governance structures outlined in section 3.4, before the activities take place, and with regard to the degree and risk (including the impact and/or likelihood) of potential harm (see section 3.2). The purpose of ethics review is to ensure that academic activities take place on a sound ethical footing and ensure that the AGE can defend work carried out in its name and on its premises.

4.2 Retrospective ethics approval is not permitted.

4.3 It is essential that the AGE is aware of all projects with ethical implications being undertaken in its name or on its premises. Where activities require ethics approval by an outside body (e.g. the NHS, the EU, or a partner organisation), it is still necessary for them to be reviewed by the relevant internal panel. This enables any issues of fundamental or specific concern for the AGE to be identified and addressed before details are submitted for external sign-off. The final outcome of ethics scrutiny by any outside body must be reported back to the relevant AGE Ethics Panel and/or committee for final ratification.

4.4 The management of ethics review and approval processes for academic activities will be overseen by personnel present in AGE's Academic Governance Structure Chart.

## 5. ROLES AND RESPONSIBILITIES

The CEO has overall responsibility for academic ethics through delegated authority to the Chair of AGE Academic Ethics Committee which will report to the Academic Council.

5.1 AGE is responsible for:

- o Maintaining and managing academic ethics and governance frameworks
- o Providing an approved structure for the leadership and management of academic ethics to ensure that the highest standards of ethics are maintained at the AGE.
- o Creating and maintaining an environment where it is safe report any breaches in ethical standard, using accessible processes including the Code of Conduct for Students Whistle Blowing Policy, the Policy and Procedure for Dealing with Allegations of Misconduct in Research, and the Academic Misconduct Procedure.

5.2 All staff and students and individuals outlined in section 2.2 are responsible for:

- o Demonstrating a personal ethical standard and delivering academic activities in a manner which maintains good ethical behaviour and AGE culture, in line with the principles outlined in section.
- o Following the appropriate AGE procedure for obtaining ethics guidance and approval to proceed
- o Recognising that that ethics approval can take time, especially for highly sensitive activity and ensuring that in their work planning they allow sufficient time to obtain ethics approval before commencing the proposed activity
- o Reporting any potential breach in ethics standards to Academic Head, the Disciplinary Committee will look into allegations of misconduct in research.

5.3 Supervisors of postgraduate research students are responsible for:

- o Providing guidance and assistance to ensure ethical design, conduct and dissemination of their students' research
- o Providing sign-off to students' applications to ethics committees

5.4 Supervisors of postgraduate students are responsible for:

- o Providing appropriate ethical guidance and taking all reasonable precautions in ensuring that students' academic activities are conducted ethically



- o Taking the role of Principal Investigator in any research, with the student acting as Co-Investigator
- o Providing sign-off to students' applications to ethics committees

5.5 Students are responsible for:

- o Complying with module-level ethics approval requirements and seeking further ethics approval if proposed activities change
- o Prompt reporting to their supervisor or module leader of any problems they have complying with ethics approval requirements
- o Where relevant and appropriate, maintaining records of ethics related information

5.6 Module Leaders are responsible for:

- o Obtaining module-level ethics approval for modules where there are, or may be, ethics issues and where students are working to prescribed guidance regarding the project aims and implementation.

5.7 Course Leaders are responsible for:

- o Ensuring that their programmes, aims, learning outcomes and delivery are aligned with the AGE's expectations around ethics
- o Upholding all appropriate policies and regulations which apply to their students/programmes

## 6. RESEARCH ETHICS

'Research ethics' refers to moral principles and actions guiding and shaping research from inception through to completion, the dissemination of findings and the archiving, future use, sharing and linking of data. The field of research ethics is active and constantly developing.

Researchers are advised to explore what is currently available specific to their field of enquiry, from their learned societies, in relevant literature and in requirements and guidance of funders and sponsors. AGE has played a part in developing ethics guidance for researchers and the following institutional principles are consistent with what is currently generally accepted across the spectrum of social sciences:

AGE researchers should:

- aim to maximise benefit and minimise harm
- respect the privacy, autonomy, diversity, values, and dignity of individuals, groups and communities
- act with integrity throughout, employing the most appropriate methods for the research purpose
- have regard to their social and professional responsibilities in conducting and disseminating their research
- engage fully with opportunities for research ethics review, guidance and training.

## **7. POLICY ENFORCEMENT**

Breach of this policy in terms of either the general ethics standard or specific process will be considered as having the potential to bring the AGE and its employees into disrepute and managed in that context. Specific processes will be brought to bear in this context, including the Academic Misconduct Procedure, the Procedure for Dealing with Allegations of Misconduct in Research and the AGE's Disciplinary Policy.

## **8. POLICY PROMOTION AND TRAINING**

AGE is responsible for providing support for those in key leadership roles within the governance structure for ethics, including committee and panel members, ensuring that they have access to the necessary knowledge and skills training in order to perform their role effectively. It also takes

the lead on bringing this policy to the attention of all those to whom it applies, and ensures that there are adequate provisions made for providing training and development for staff and students in the principles and application of ethics policy to enable staff and students to understand what is expected of them.

The AGE Academic Council will be responsible for promotion of academic ethics policy and making of related training materials.

## 9. GOVERNANCE

### **Introduction to AGE Governance and Management**

1. For the purpose of this Code, 'governance' is defined as the systems, structures, procedures and rules by which the AGE takes decisions on its affairs and is held accountable for them. This includes setting the AGE's strategic aims and objectives, monitoring and measuring performance against these, ensuring accountability and effective scrutiny, and appointing and ensuring the effectiveness of the head of the institution and other senior officers.
2. Governance therefore is distinct from the day-to-day 'management' of the AGE, which is more about the pursuit of agreed aims and objectives, the implementation of agreed policies, the preparation of new policy proposals, and the efficient and effective deployment of resources.
3. Despite this distinction there is a critical interface between good governance and effective management, and the academic, research and commercial success of the AGE is very much dependent upon this interface.

## 10. ACADEMIC COUNCIL

1. The Academic Council is the governing body of AGE and is the final authority for ratifying all ethical policy governing procedures. It has the responsibility to satisfy itself that the systems, structures, procedures and rules for the running of the AGE are appropriate, necessary and fit for purpose. Members of Council are expected to ask probing, searching questions in relation to these matters and to satisfy themselves that the responses are sound, confident and consistent.
2. Parallel with this, the management is concerned with the day-to-day running of the learning platform; with advising the governing body about policies and objectives; and with devising means of implementing agreed policies and meeting agreed objectives. The AGE's Executive Council, which is chaired by the CEO, is accountable to Council in respect of governance of all matters, which are non-academic in nature.

## **11. BOARD OF DIRECTORS**

Athena Global Education is governed by the Board of Directors (BoD). The Board of Directors governs the organisation's overall strategy and operations, and it's supported by an Executive Council, Academic Council and a number of Committees. The BoD has the ultimate authority within the organisation, but it has to respect the views of the Academic Council in the matters related to the academic operations.