CASA Ethics Procedure for MSc/MRes Dissertations

Form B: Low Risk Ethics Application & Data Protection Registration

What this form is about

You should complete this form only if *Form A: Screening of Ethical Risk* identified your research as low risk; if you have not yet completed it, please do not proceed and complete Form A first.

The purpose of this form is to

- Record details on the low ethical risk of your research, including – where applicable – risks to both potential participants and yourself;
- Specify how your research abides to the principles of benefit and (no) harm, informed consent and confidentiality, as described in *Form A: Screening of Ethical Risk*;
- Specify ways in which you responsibly address ethical risks in your research, including – where applicable – a protocol for managing pre-collected data, Personal Data and Sensitive Data.

If your research is low risk, you must submit this form and receive an approval notice before you can proceed with your research.

How to complete this form

This form contains seven sections covering:

1. General information about your project
2. Research methods
3. Location, Permissions & Risks to Researchers
4. Details of participants
5. Accessing and processing pre-collected data
6. Processing Personal Data and Sensitive Data
7. Declaration

Please note that sections 4, 5 and 6 may not be applicable to your research. Depending on your research methods, you might need to develop and provide a Participant Information and Consent Sheet. There will be clear instructions in the form as to which sections you need to complete and what additional information you need to provide.

Please note, if your research involves the recruitment of participants, you should not offer any monetary compensation or incentives other than confirming to share a copy of your final research report or providing coffee or refreshments during the interview.

If you have any questions while filling in the form, please contact your supervisor.

1. General information

Student name:	Student email address:	Student number:

Supervisor name:	Supervisor email address:	Date:

Dissertation research project title or topic:

2. Research methods

2.1. Provide a brief background (including aims) to the project in plain English (300 words max).

2.2. Which methods are you going to use?

Tick all that apply.

- ☐ Secondary data analysis (pre-collected data)
- ☐ Collection/use of sensor or locational data
- ☐ Interviews
- ☐ Focus groups
- ☐ Questionnaires (including surveys and oral questions)
- ☐ Observation of participants in their own environment
- ☐ Observation of participants in a different environment
- ☐ Action research, with the observer participating
- ☐ Documentary analysis (systematic analysis of written material, this can include the use of personal records)
- ☐ Audio/visual recordings (including photographs)
- ☐ Controlled Trial
- ☐ Intervention study (including changing environments)
- ☐ Systematic review (of published research)
- ☐ Advisory/consultation groups
- ☐ Other, please give details:

2.3. Provide an overview in plain English of the project (500 words max).

Please focus on your research design and describe what data or samples you will collect, how you will collect data, what topics you will cover and what you will ask any participants to do. You should justify your chosen methods.

3. Location, permissions & risks to researchers

→ *UCL has a duty of care to all its staff and students under the Health and Safety at Work Act*

3.1. Will you conduct all or part of your research outside the UK?

- ◯ **YES.** Go to the next question.
- ◯ **NO.** Go to question 3.3.

3.2. If the research includes work outside the UK, is ethical approval in the host country (local ethical approval) required?

See Guidelines for Research Conducted Overseas.

- ◯ **YES.** Please specify the countries and confirm whether ethical approval has been received. If applicable, attached a copy of local ethical approval.
- ◯ **NO.** Please confirm if local ethical approval will be sought or why it is not necessary.

3.3. In what type of location will your research take place?

For example, in public spaces, offices, private properties, hotels, via video call etc.

3.4. Is permission required to conduct your research at the locations you list above?

◯ **YES.** Please explain how this permission will be obtained prior to data collection.

◯ **NO.** Go to the next question.

3.5. During the research, will you conduct the research in any of these places?

	YES	NO
Alone in a non-public place (e.g. dwellings, workplaces with very few workers present)?	◯	◯
Alone in a public place with few other people present (e.g. quiet park/street)?	◯	◯
In a place where the research topic might be considered sensitive?	◯	◯
Overseas in an area where the UK Foreign, Commonwealth & Development Office (FCDO) advises against travel (amber / red on the FCDO map of that country).	◯	◯

*If you answered **YES** to any of the question above, you must complete a Risk Assessment.*

☐ Confirm that you will complete a risk assessment. Contact CASA's Teaching Team (casa-teaching@ucl.ac.uk) and attach the completed risk assessment to this application.

4. Details of participants

→ *Participants may only be included in your research if they have given informed consent to participate.*

4.1. Are you planning to recruit participants into the study?

◯ **YES.** Describe how potential participants will be recruited.

This should include reference to how you will identify and approach participants. For example, will participants self-identify by responding to an advert for the study or will you approach them directly, such as in person or via email?

***Now**: Use this template to develop a process to inform participants about your study and seek their consent to participate. Provide a brief description of the process here:*

◯ **NO.** Go to section 5.

4.2. How will you record consent?

Tick all that apply

- ☐ Noting consent at the start of *an Anonymous Verbal Survey*
- ☐ Recording consent at the start of *a Written Questionnaire or Survey* [highly recommended]
- ☐ Recording consent to interviews or focus groups using Email [highly recommended]
- ☐ Recording consent *Verbally* [highly recommended]
- ☐ Recording consent using a *Signed or Initialled Form*
- ☐ Other, please describe:

4.3. Please state any *benefits* to participants in taking part in the study

This may include feedback, access to services or incentives.

4.4. Please state any *risks* to participants and how these risks will be addressed.

5. Accessing and processing pre-collected data

→ *Unless available in the public domain, pre-collected data may only be used if permissions have been obtained from data owners.*

5.1. Does your study involve the use of previously collected data?

- ◯ **YES.** Please list the names of all data sources that you are intending to use and specify their owners (where available you may wish to provide a URL for describing/accessing the data).
- ◯ **NO.** Go to section 6.

5.2. Are all the datasets in the public domain?

Material that any member of the public is (legitimately) free to access and use, without having to obtain permission from anyone else, would be considered as being in the public domain.

- ◯ **YES.** Go to section 6.
- ◯ **NO.** Go to the next question.

5.3. Do you have the owners' permission to use their data?

- ◯ **YES.** Please specify how the permission was given (e.g. through a data sharing agreement) and attach the agreement to this form, if applicable.

- ◯ **NO.** Please explain how you intend to obtain permission or why permission is not needed.

5.4. Will you be conducting analysis within the remit the data were originally collected for?

- ◯ **YES.**
- ◯ **NO.** Please explain how consent was gained from participants for further analysis and describe how you address any ethical issues that may arise from your use of data outside their remit.

6. Personal Data and Sensitive Data

→ *Adhere to fair processing principles when using Personal Data or Sensitive Data*

6.1. Are the data you intend to use fully anonymised?

- ◯ **NO,** it may be possible to identify individuals (including indirectly/by chance). ⇒ Go to question 6.2.
- ◯ **NO,** but it will not be possible to identify individuals. ⇒ Go to question 6.4.
- ◯ **YES.** ⇒ Go to question 6.4.

6.2. What types of Personal Data are you collecting and processing?

*If you collect and process data that are not anonymised or that may allow identification of individuals indirectly or by chance, then you are processing **Personal Data**. Personal Data comprise data pertaining to a person who could directly or indirectly be identified from that data, including data that you are collecting simply to contact your participants, such as names, residential addresses, email addresses, telephone number or IP addresses. You may only collect or process Personal Data if absolutely necessary and if appropriate safeguards are in place.*

Important: If you intend to process Personal Data, please complete the following training: UCL Data Protection for Researchers and Students.

Please list the Personal Data items that you are planning to collect and process:

If your research has been registered for Data Protection elsewhere, please state the institution and the registration reference code:

6.3. Please confirm that you will conscientiously adhere to the following fair processing practices.

(a) You will process the data fairly and lawfully abiding by UCL Data protection guiding principles.

(b) You will collect and/or use the minimum personal data necessary for the research.

(c) You will only use the personal data in a manner compatible with the research specified in this application.

(d) You will not process this data in ways likely to cause substantial damage or distress to individuals.

(e) You will not use this data to support measures or decisions with respect to individuals (e.g. automated processing or profiling).

(f) You will not share any personal data outside of the research and supervisory team.

(g) Wherever possible, you will pseudonymise data and keep personal data encrypted and separated from research data, so that it is impossible to identify individuals from the research data.

(h) You will ensure research data is fully anonymised, using UK Data Service guidelines, before sharing it.

(i) You will not transfer Personal Data originating from inside European Economic Area (EEA) outside the EEA.

(j) If you need to share personal data with an external organisation who is authorised to access the data, you will use UCL Dropbox service and you will *not use your personal* Dropbox or email account.

(k) You will secure your computer and lock it when not in use to ensure other people cannot see the Personal Data (e.g. by people looking over your shoulder in when in shared spaces).

(l) You will store any electronic Personal Data on your N: Drive personal storage space (with up to 100GB available, for more storage space contact your supervisor and ISD) or on encrypted portable devices (mobile phones, laptops, USB flash drives, or portable hard drives), using UCL Information Security guidance.

(m) You will store any manual Personal Data in locked units – from when participants submit until it is securely destroyed.

(n) You will be responsible for performing regular backups of the data.

(o) You will not keep the Personal Data for any longer than is strictly necessary.

(p) You will securely destroy Personal Data items when it is no longer required.

☐ Please confirm that you have thoroughly read and understood these practices and that you will apply them throughout the course of your research.

6.4. Will you collect or process data on the following *potentially sensitive* topics?

(a) Physical health or condition

(b) Mental health or condition

(c) Use of health care services

(d) Sex life

(e) Sexual orientation

(f) Religious / similar beliefs

(g) Racial or ethnic origin

(h) Political opinions

(i) Trade union membership

(j) Criminal record / commission / alleged commission of an offence, or related proceedings / sentencing

(k) Genetic or biometric data

(l) Other questions participants could find sensitive/upsetting (not covered under Data Protection law)

◯ Confirm that **you are not collecting and processing data** on any of the potentially sensitive topics listed above

– OR –

◯ For **each** of these potentially sensitive categories, please justify why you need them and explain how the risk of processing these data are balanced against the public benefit of your research.

***Remember that**:*

- *You may only collect or process this data if it is in the public interest for you to do so.*
- *You may only collect or process this data if you are collecting the minimum sensitive data necessary.*
- *You may only collect or process this data if appropriate safeguards are in place.*

- *You must NOT store electronic sensitive personal data on portable devices such as mobile phones, laptops, USB flash drives, or portable hard drives.*
- *You should ONLY store electronic sensitive personal data on your N: Drive (part of the Filestore@UCL central file storage service).*

7. Declaration and next steps

I confirm that:

- ☐ The information provided is accurate to the best of my knowledge.
- ☐ I will begin with my research only after I have received ethical approval.
- ☐ If answers to any of these questions change, I will submit a new ethics application and secure approval before I begin with my research.
- ☐ If applicable, I have attached local ethics approval from overseas.
- ☐ If applicable, I have attached a risk assessment.
- ☐ If applicable, I have attached the full set of questions / interview guides.
- ☐ If applicable, I have attached the Participant Information and Consent Sheet.
- ☐ If applicable, I have completed the UCL Data Protection training.

8. Supervisor sign-off

Please send this completed form to your supervisor for sign-off.

Supervisors only:

☐ I confirm that all information provided in this form is accurate and that I fully support this application.

Supervisors: please return form to student.

9. Next steps

Please submit your form to Moodle.

The form will be reviewed by the Departmental Ethics Reviewers according to the evaluation scheme shown on the next page. The outcome of the evaluation will be shared on Moodle. You must await the outcome of the evaluation before you can begin your research.

Reviewer checklist

Section 2 – Research methods

- The project is described clearly.
- The methods described seem feasible and adequate for the research project.

Section 3 – Research location, permissions and risks to researchers

- It is clear whether research will be conducted in a country requiring local ethical approval and, if so, sufficient evidence of local ethical approval has been provided.
- It is clear whether permission to conduct the research is necessary and, whether this will be obtained prior to data collection.
- Any risks to the researcher have been clearly identified and, if needed, evidence of risk assessment has been provided.

Section 4 – Details of participants (Refer to attached participant Information and consent form

- The processes of choosing and inviting participants and providing participant information in advance are all clearly stated.
- A Participant Information and Consent Sheet has been developed and covers all relevant points, including contact details, funder, details of the study or experiment, potential risks/harms, anonymity/confidentiality, voluntariness, right to withdraw, data protection, participant declaration.
- The Participant Information and Consent Sheet is written in an appropriate style
- The process of recording consent uses an approved method listed in question 4.2.

Section 5 – Accessing and processing pre-collected data

- The process of obtaining pre-collected data is clear and plausible.
- The data sources and ownership are clearly stated.
- Permission to access them has been obtained. If not, a valid justification is provided.
- If data will be analysed for a different purpose than the original remit, a ethical issues have been identified and will be addressed effectively.

Section 6 – Personal Data and Sensitive Data

- Applicant correctly identifies whether personal data are being collected or processed.
- Applicant correctly identifies whether potentially sensitive data are being collected / processed.
- Any uses of Sensitive Data are sufficiently justified and reflected on with regard to the public benefit of the research.
- Applicant confirms that Personal Data or Sensitive Data will be processed according to the fair processing practices.
- If sensitive questions or data are used, all questions, discussion or interview guides are attached, if applicable.