# Faculty of Arts and Humanities Ethics Approval Process

## Guidelines for supervisors for projects starting after September 2019

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**The role of supervisors in student ethics approval applications**

Supervisors play a key role in ensuring that the ethics application process goes smoothly.

* All supervisors should help students to register their projects on ERGOII to work out if further ethics review is required.
* Supervisors should guide students to ensure that the research project meets relevant ethical standards.
* Student’s ethics applications must be approved by the supervisor. Approval is required BOTH before applications undergo ethics committee review and before student applications that do not require full ethics review count as logged.

As a supervisor, it is your responsibility to check your student’s ethics application before submission. If you do not believe that your student’s application is of an appropriate standard, do not approve it.

It is important to ensure that you review your student’s ethics applications in a timely manner. Each round of ethics review can take up to ten working days from the point at which it is approved by the supervisor and received by the committee. We recommend allowing 6 weeks from initial submission to start date.

You will receive an email when your student project is ready to be approved. You can also check whether there are any reviews waiting for approval by logging on to ERGOII, going to the ‘Reviews’ tab and clicking on ‘List my reviews’.

It is appropriate to ask students to improve the standard of English used in their questionnaires (if these will be issued in English). The university regards this as a reputational issue.

**Before you approve your student’s ethics application**

Ask yourself:

* Do all the dates match – and is the start date in the future?
* Is the correct version number/ ERGO number / study title and University of Southampton logo on all participant facing documents?
* Have they included all communication with participants?
* Are the Ethics Forms, Participant Information and Consent Forms based on up to date templates available from the ERGO Template Documents Store?
* Have they identified all the relevant data (including e.g. email contact details for arranging interviews) and thought about how to store it securely? (See Ethics Application Form 6.8 for guidance)
* Have they identified and responded to any possible ethical issues including ensuring that participants do not feel pressured or coerced to take part?
* If the project involves work with minors, have they acquired appropriate consents and assents? (See Ethics Application Form section 4.4. for advice on good practice when working with minors)

### 1. Does your students’ project require ethics review?

**From September 2019, all students in the Faculty of Arts and Humanities undertaking a research project MUST register each research project on ERGOII, the university’s online research ethics approval system.**

**This replaces the paper Ethics Checklists which were previously used. Filling out a paper ethics checklist is no longer required from September 2019.**

After logging on to ERGO II, your student will be asked a series of questions about their project. The key questions are:

* **Will your study involve human participants?**
* **Will your study involve the analysis of secondary data, previously collected from human participants?**
* **Will your study involve human biological material?**
* **Will your study involve animals (dead or alive, including animal tissue or products)?**
* **Will your research involve tangible cultural heritage as defined in the University’s Ethics Policy on Cultural Heritage?**

With each question, there is some guidance to help your student work out whether they should answer yes or no. There is also further guidance in this document, in the sections 3, 4 and 5 of this document.

**Note that your student’s research may count as ‘secondary data analysis’ or even as gathering data directly from human participants even if you do not think of them as using ‘data’.**  If your student is using people’s words or information about people in any way, please read see the section on Secondary Data Analysis to make sure they are answering the questions correctly. If you are unsure, contact [Risethics@soton.ac.uk](mailto:Risethics@soton.ac.uk), your discipline ethics rep or the Faculty Ethics Chair.

If your student answers **No** to **all** these key questions from the initial ERGO Questionaire, then their project will not need further Ethics Review. The supervisor will receive an email asking them to approval the questionnaire. **Student projects will not count as logged until they have received approval from their supervisor.**

They will be required to submit their ERGO number and/or a print out of their approval page or email at some stage during their module. The module coordinator or discipline ethics representative will provide details.

Please bear the key questions in mind as the research advances; if your student makes significant changes in the methodology of their project, they may need to apply for ethics approval when previously they did not, or they may need to reapply for approval in light of those changes.

Section 6 provides a step by step guide to completing an ERGO application. If they answer ‘no’ to all the key questions they will only need to complete steps 1-5.

### 2. Applying for Ethics Committee approval (including important information about timings)

**All applications for Ethics Committee approval are made and processed online through the ERGO II system.**

**It is the student’s responsibility to apply for Ethics Committee approval**. It is then the responsibility of the student’s supervisor to review, correct and approve the submission before it is considered by the Ethics Committee.

**They must apply for approval before the research commences.** Approval cannot be granted retrospectively.

**They must allow sufficient time in advance of commencing their research.** When planning their project, you should discuss with your student how long you will need to check their application,

allow time for this and then give the Ethics Committee **ten working days** for **each round** of review. We recommend allowing 6 weeks from initial submission to start date.

You can email [f.woollard@soton.ac.uk](mailto:f.woollard@soton.ac.uk) if you believe that there has been a problem with the Ethics Approval Process. **I’d also very much encourage supervisors to get in touch with me if a project is very time sensitive to help me keep a special eye on such projects.**

**If an application has required multiple revisions, please strongly encourage your students to use the Ethics Application Drop In Sessions before resubmitting.** You can also get in touch with me so I can keep offer help and advice or keep an eye on the process.

### 3. Guiding Principles: Ethical From Beginning to End

The University’s Ethics Policy sets out the following principles of ethical research:

**1.** Studies and research should be designed, reviewed and undertaken to ensure integrity, quality and transparency.

**2.** Participants must be fully informed about the research or study they are invited to participate in and their consent to take part must be made voluntarily, freely and without any coercion. Consents should be recorded, ideally in writing.

**3.** Risks should be managed so that harm and/or damage arising from the research is avoided or minimised wherever possible and measures should be taken to ensure that the benefits of research/study should outweigh any potential harm or damage caused.

**4.** The independence of the research/study must be clear, and any conflicts of interest or partiality must be explicit.

**5.** The same high ethical standards shall apply wherever in the world the study/research is undertaken.

The full policy is available here:

<http://www.southampton.ac.uk/about/governance/policies/ethics.page>

The Ethics Review process is intended to cover the whole of the project, from the first moment that you contact the researcher contacts participants right through to the moment they archive or delete their data. **They need to show that the whole project will meet the University’s ethical standards.**

This is why they may be asked to include some material that may be surprising.

For example, they need to **include any emails or letters they send to participants**, even if they are just emailing them the link to an online survey. They need to make sure that their email is professional and does not make participants feel pressured to take part.

They need to make sure that all emails have the ERGO number and project title, and say that the project is part of their [insert degree] at the University of Southampton. In fact, **anything that will be seen by participants (including any emails, posters, flyers etc) needs to have the University of Southampton logo, version number, date, ethics number (ERGO ID for most studies)**. If it is not possible to include the logo, then they should include the name of the university.

Including the ERGO number and University name/ logo is important because it reassures potential participants that the project has had the right ethical review and allows them to raise any concerns.

Including the version number and date (and making sure that these all match up correctly) ensures that participants who give consent have seen the documents that were approved by the ethics committee. This is all part of the key guiding principle of informed and un-coerced consent.

Following recent legal changes, researchers are required to be much more careful about how they store and share participants’ personal data. We are also required to make sure that participants are fully informed about what data will be collected and how it will be stored.

All this means that the ethics application process can be a bit fiddly. Our Ethics Application Form for Research Involving Human Participants has been developed to help researchers to avoid common mistakes that lead to revisions requests. The form is quite long. However, a lot of the form involves simply ticking boxes to confirm you have got those small but important details right. You can think of this form as a kind of checklist.

Students **do not** need to upload the initial ethics checklist, a risk assessment or a separate research protocol or research proposal with their ERGO submission. Including additional documents describing your research project slows down the review process (as reviewers are required to read everything uploaded) and makes it more likely that there will be inconsistencies between documents that mean that the reviewer has to request revisions.

There is lots of help available to support you and your student through the ethics process. A list of where to find help can be found at the end of this document.

### 4. Secondary Data Analysis

Ethics approval can be needed for studies that don't involve gathering information directly from human participants but still involve using people’s words or information about them.

If you meet the conditions requiring approval below, and you not gathering information from human participants, you should answer ‘No’ to the question about human participants and ‘Yes’ to the question asking if your project involves the analysis of secondary data, previously collected from human participants.

Approval is needed if:

* The project uses unaggregated data previously collected for research or clinical data
* The project uses 'unpublished' material which is already available on a public course e.g. the internet, where the poster is treated as an object of study i.e. comments / material posted on social media sites, any comments left by members of the public on public sites.

Approval is not needed for:

* analysis of aggregated data
* meta-analyses of other studies
* literature reviews or reviews/ analyses of anything that has been 'published': ie reports, policies, documents, meeting minutes, newspaper articles, films, tv shows, radio broadcasts.
* Use of self-published material which are engaging with the commentator as an intellectual agent (i.e. responses to Professor X's argument given in her blog, with appropriate citing)

Self-published material (i.e. blogs, vlogs) are a bit of a grey area, but ethics approval should probably be sought if the poster is a member of the public (or posting as a member of the public) and being treated as an object of study.

If you are unsure, you should seek advice from [risethic@soton.ac.uk](mailto:risethic@soton.ac.uk), your discipline ethics rep or the Faculty Ethics Chair.

If ethics approval is required on these grounds, then the Secondary Data Analysis ethics application form should be used.  This is much shorter and simpler than the Ethics Application for Studies involving Human Participants.

The key part of this applications is question 9, which asks “What are the terms and conditions around the use of the data? Did data subjects give consent for their data to be re-used? If not, on what basis is re-use of the data justified?” Here the researcherhas to say whether consent was given for the data to be re-used in this way and if not justify their planned use of the data.

In the cases involving using data already existing on the internet, this would involve (a) noting that the researcher is not breaking the rules of the platform and (b) arguing that the content is public enough that they can reasonably be thought of as implicitly agreeing to its reuse and (c) showing that reusing it in this way is not harmful to the participants or otherwise objectionable.

For further guidance see:

Internet Mediated Research Guidance

Secondary data Guidance

Which can be found on the Research Policies and Guidance Sharepoint page: https://intranet.soton.ac.uk/sites/researcherportal/Lists/Services1/testing.aspx?ID=895

### 5. The Cultural Heritage Policy

“All researchers engaged in research involving cultural heritage (as defined in Section 2 above) must check whether their study requires ethics review from their Faculty Research Ethics Committee (FREC). This can be done through the completion of the filter questions on the University’s online platform ERGO II (Ethics and Research Governance Online) accessible at https://ergo2.soton.ac.uk/, or a Faculty Ethics Checklist (where available). Where answers to the questions indicate that ethics review by the FREC is required, research and data collection must not commence until ethics approval is granted by the FREC and communicated to researchers via ERGO II. Retrospective ethics review is not permitted.”

According to the University’s Policy tangible cultural heritage comprises:

* Movable cultural heritage, including artefacts and other archaeological materials of cultural value, works of art, and artefacts of historic importance such as rare books and manuscripts.
* Immovable cultural heritage including archaeological sites, heritage structures, and cultural landscapes both urban and rural.
* Human remains more than 100 years old.

Research involving Cultural Heritage requires Ethics Committee Approval when:

* the study involves intrusive or destructive intervention in cultural heritage.

(This might include archaeological excavation, surface collection of cultural artefacts, destructive analysis of cultural artefacts or materials, or activities leading to a loss of artefact provenance information.)

* the study involves work with historic artefacts or materials that may be ethically or legally sensitive

(This might include artefacts of uncertain provenance where there is the possibility that they have been illegally excavated and/or exported from their country of origin, artefacts of uncertain ownership, artefacts or materials of particular significance to indigenous people.)

* the study involves gathering of information leading to the commercial exploitation of cultural heritage, specifically activities that facilitate treasure hunting, pillaging or commercial salvage operations, usually with the aim of financial gain by putting artefacts from a heritage site up for sale
* the study involves work with human remains dating from more than 100 years ago

However, in many cases, a full ethics review will not be required. If all areas of ethical concern are covered by relevant policies, guidelines or legislation, they will be able to declare this in the ERGO II submission questionnaire and will not need to undergo a full ethics review on the basis of Cultural Heritage. **(Please make sure that your students have discussed this with you.)**

### 6. Step by Step Guide to Completing an ERGO II Application

1. Go to [www.ergo2.soton.ac.uk](http://www.ergo.soton.ac.uk)
2. Give your submission an informative name. This will be the project name on your participant facing document, so choose appropriately!
3. Select the ‘submission questionnaire’ tab to complete the Submission Questionnaire.
4. If you are completing a ERGO application because your research involves Cultural Heritage, you will have an opportunity to select relevant guidelines, policies and legislation and to self-declare your project as described in section 2.
5. When you have completed the Submission Questionnaire, the system will tell you whether you need to complete an Ethics Review. Save and Continue.
6. If you need to complete an Ethics Review, go to the ‘attachment’ tab to add the Faculty documents – these can be found in the “Template Documents” section where you will also find the Faculty ethics guidelines. You will be required to provide a version number and date for each document you upload. This is to make the process easier in case of resubmission.
7. All ethics applications which require **full** Cultural Heritage ethics review require the following documents (note: applications that **do not contain** all the documents will be sent back for revision):

a.  Ethics Application Form for Research Involving Cultural Heritage

b.  Any other documentation that is needed to assess the ethics of your project

(Note 1: most applications involving Cultural Heritage will not require full ethics review. See the section on Cultural Heritage for details.

Note 2: if your research involves both Cultural Heritage and Human Participants, you will have to fill in the Human Participants form too).

1. All studies involving data collection from Human Participants (or Human Tissue less than 100 years old) require the following documents (note: applications that **do not contain** all the documents will be sent back for revision):

a.  Ethics Application Form for Research Involving Human Participants

b.  The questionnaire or details on your research questions\*

c. Any communication that you will be using to recruit participants, including emails, posters, flyers, tweets, etc.

d.  Letters/ emails of permission from any relevant third parties and any text that you will ask them to send to participants on your behalf.

e. A participant information sheet\*\*

f.  Consent form\*\*

\*If you are issuing a questionnaire, you must include in your submission the specific questions you will be asking participants. If you are conducting more informal interviews, you must provide information concerning your research questions and methods.

\*\*For internet questionnaires or surveys you should choose the ‘combined internet participant sheet and consent form’ instead of using two separate documents.

1. All studies involving secondary data analysis of data from Human Participants (or Human Tissue less than 100 years old) require the following documents (note: applications that **do not contain** all the documents will be sent back for revision):

a.  Ethics Application Form for Secondary Data Analysis

1. You **do not** need to upload the ethics checklist, a risk assessment or a separate research protocol or research proposal. All relevant information about the project should be included in the Ethics Application Form. Including additional documents describing your research project slows down the review process (as reviewers are required to read everything uploaded) and makes it more likely that there will be inconsistencies between documents that mean that the reviewer has to request revisions.
2. ERGOII automatically categorises your project as Category A, B or C.
3. The student researcher submits the application through ERGOII, and it is sent through ERGOII to their supervisor.
4. The supervisor checks over the application to make sure s/he is satisfied and if so, clicks ‘approve’ so that the application is submitted to the Committee. If amendments are required, the tutor/supervisor can ‘request revision’ and it is returned to the student.
5. Once approved by the supervisor, the application goes to the Ethics Committee administrator to allocate a member (or two members) of the Committee to review the application.
6. The application is reviewed by the Committee member(s) online. The Committee member(s) will either “approve” or—if there are any questions—“request revision”.  You will receive an automatic email from ERGOII to this effect.
7. In the event that the ERGOII system categorises your project as category A, the project will automatically be sent to the Research Governance Office for final review and approval.

### 7. Risk Assessments

Students are not required to upload risk assessments with their ethics application. There is now a short section in the main ethics form asking them to note any risks to researchers that are greater than those encountered in normal day to day life.  We also require students to confirm that they have discussed potential risks to researchers with their supervisors and all researchers to confirm that they have completed any relevant Health and Safety risk assessments. For more details about risk assessments, see the Guidance on Risk Assessments, which is available in the Template Document store on ERGO.

**We would like to remind supervisors that there is a duty of care for students.** There have been cases in the past of students submitting ethics application which put them at unnecessary risk i.e. proposing to perform interviews at stranger's houses at night without notifying anyone of their whereabouts.  We would like to encourage all supervisors to recognise the duty of care in discussing potential risks with their students.

### 8. Resubmitting after a revision request

The reviewer may request revisions to your student’s application.

The application will be processed more quickly if it is easy for the reviewer to see how the students has responded to their comments. If revisions are requested, **please make you’re your student has completed the section of the Ethics Application Form that asks them to list the reviewer’s comments** and note how they have responded to each one. If the project involves purely secondary data analysis, this information should be included in a separate document.

The student will have been asked to provide a version number and date for each document uploaded.  On a resubmission after revision request, the system will group together previous versions of a document under the most recent version, and mark the previous versions as as obsolete. Any documents marked as obsolete will not be counted as part of your resubmitted ethics application.  The submitter also has the ability to “upload new version” and “mark obsolete” any documents where the system has not picked this up.  **Please check your student’s documents’ status carefully before resubmission, to make sure all and only the current documents are being considered.**

If you have any questions about any of the revisions that your student has been requested to make, you can receive help and advice by attending an Ethics Application Drop In Session, or getting in touch with your discipline ethics representative or the Faculty Ethics Chair.

### 9. Further guidelines and where to find help

Further guidance can be found through the Ethics section of the Researcher Portal

https://intranet.soton.ac.uk/sites/researcherportal/Lists/Services1/testing.aspx?ID=533&RootFolder=%2A

and the ‘Faculty of Humanities: Ethical Guidelines for Research’ document available through ERGO.

If you would like to discuss your students’ ethics application, you can come to an Ethics Application Drop In session. (You can also encourage your student to attend these sessions.) Coming to an Ethics Application Drop In Session can be useful at any stage of the ethics application process, whether your student is just beginning to plan their research, about to submit their ethics application, or dealing with a request for revisions. Details of when and where the Ethics Application Drop in Sessions will be held can be found in the Ethics Section here https://intranet.soton.ac.uk/sites/humanities/research/default.aspx

You can also contact your discipline Ethics Representative.

**The Faculty Ethics Committee: Your Ethics Representatives**

Chair of the Faculty Ethics Committee: Fiona Woollard

Deputy Chair of the Faculty Ethics Committee: Adam Dunn

Archaeology: Alison Gascoigne; Josh Pollard

Film: Sofia Bull

Music: Mark Everist

MLL: TBC; Michael Kranert

English: Alireza Fakhrkonandeh

Philosophy: Brian McElwee

History: Dan Levene; Lena Wahlgren-Smith

Graduate School: Adriana Patino

WSA: Dan Ashton; Holly-Gale Millette; Megen De Bruin-Mole; Molly Mills; Seth Giddings; Yuanyuan Yin

PGR Reps

Humanities: Kamelia Kerkache and Ouacila Ait-Eldjoudi

WSA: Naciye Demirkol; Samantha Schafer

You can find contact details for your ethics representatives and their advice and feedback hours on their University Staff Profile pages. (Just search online for their name and ‘University of Southampton’)