Guidance on Sensitive Areas in Research

Aim and Purpose

The University Group considers the Ethical Integrity of its research to be imperative, and will not approve any research which could potentially cause harm, either during the research process or through its eventual outcomes.

There are risks inherent in undertaking any research, which have to be carefully managed, but there are some types of research which require additional consideration during the planning stage due to the sensitive nature of the research topic. If not properly managed, the risks associated with more sensitive research can lead to personal and institutional liability and reputational damages, for individuals and the institution.

This guidance specifies the relevant definitions and outlines the structures and processes that should be in place to support the management of issues associated with sensitive areas of research and key responsibilities for those involved.

This guidance applies to all staff (including visiting academics) and students of Coventry University Group involved in research activities, regardless of the funding source or location the research is being undertaken.

This guidance will consider by default that the UK laws prevail, but some research projects might also need to adhere to other national laws.

Definition of Sensitive Research

Sensitive Research will normally refer to any high-risk research activity, which meets at least one of the following criteria:
- It concerns extremism, radicalisation and/or other matters pertaining to [inter]national defence and security
- Its findings will not be made public and/or communicated according to the normal university protocols concerning open access and dissemination
- It examines illegal activities or organisations
- It considers issues of a particularly personal, delicate and/or potentially distressing nature, which may cause emotional or psychological harm to participants and researchers
- It puts researchers in a position where their safety may be compromised
- It involves the use of websites, data sources and methodologies that would normally be prohibited by the University
- It is likely to prove particularly contentious or controversial
- It involves travel to regions rated as extreme risk by the University's travel risk assessment procedure

Examples of sensitive research activities include, but are not necessarily limited to, the following areas:
- Security-sensitive research – e.g. extremism, cyber-security, terrorism, radicalisation, military or defence-related projects; projects that require security-clearance (e.g. working in prisons, hospitals)
- Commercially-sensitive research – e.g. prototype work undertaken for commercial organisations for which the contract imposes a degree of secrecy
- Environmentally-sensitive research – e.g. research which risks unwarranted impacts on natural environments or work in areas posing extreme risk to researchers e.g. active conflict zone.
- Participant-sensitive research – e.g. animal experiments, work involving children and other vulnerable human participants
- Use of potentially distressing or explicit imagery

- Subject-sensitive research – e.g. pornography, sexual harassment and exploitation, FGM, hate crimes, projects related to the tobacco, alcohol, drug or gambling industries, research involving artificial intelligence, especially when that artificial intelligence is to be applied in real world situations where decision making could have significant negative impacts on humans, animals or natural environments (e.g. autonomous weapon systems, autonomous robots, self-driving vehicles).

Research in Sensitive Areas - PREVENT

Prevent is about safeguarding people and communities from the threat of terrorism. Prevent is 1 of the 4 elements of CONTEST, the Government's counter-terrorism strategy. It aims to stop people becoming terrorists or supporting terrorism. The Prevent strategy includes:

- Responds to the ideological challenge we face from terrorism and aspects of extremism, and the threat we face from those who promote these views;
- Provides practical help to prevent people from being drawn into terrorism and ensure they are given appropriate advice and support;
- Works with a wide range of sectors (including education, criminal justice, faith, charities, online and health) where there are risks of radicalisation that we need to deal with.

"The University has a duty, under s.26 (1) of the Counter-Terrorism and Security Act 2015, to have due regard for the need to prevent people from being drawn into terrorism (See the Safeguarding Policy for more detail on the Prevent Duty). Government guidance stipulates that the University must have clear policies and procedures for students and staff working on sensitive or extremism-related research. This enables the University to identify and address issues where security-sensitive materials are accessed for non-research purposes (see UUK Oversight of Security Sensitive Research Material).

Under s.31 (2) of the Counter-Terrorism and Security Act 2015 the University must have particular regard for freedom of expression and academic freedom when exercising its prevent duty. In order to achieve a balance between protecting legitimate research and protecting the public from risks, the University has expanded existing ethics approval processes and accommodated more openness in the research being conducted.

The ethics application includes a section on whether, as part of your research, you will access sensitive or extremism-related research. To declare at the start of a project that you intend on using security sensitive information, is in keeping with openness in research and will help reduce mis-identifications as suspect or criminal behaviour. If you are researching sensitive or extremism-related research, you must upload any security-sensitive documents to a secure platform on the University server. By keeping such material away from personal computers, it ensures that it cannot be exchanged with external resources whilst also shielding research material from unjustified external scrutiny.

If you are undertaking research in sensitive areas you are advised to download the UUK Template, complete the form and upload to the Attachments section of the ethics application.

Data Protection

In addition to completing an ethics application, data protection must be considered separately, as it is important to comply with legislative requirements set out in the General Data Protection Regulation (2016) and the Data Protection Act 2018.

Your research may involve:

- Personal data defined as, "Any information relating to an identified or identifiable person (a 'data subject') or from which a person can be identified either directly or indirectly" such as:

- o Name
- o Age
- o Address
- o Height
- Special Category Data, such as:
  - o Racial or ethnic origin
  - o Political opinions
  - o Religious or philosophical beliefs
  - o Trade union membership
  - o Health
  - o Sex life
  - o Sexual orientation
  - o Biometric data
  - o Genetic data
- Criminal Data, such as Criminal Offence and Conviction Data

Any researcher (staff/postgraduate research student only) using personal data, special category data or criminal offence and conviction data, as part of a research project should complete a Data Protection Impact Assessment (DPIA) or GDPR compliance report. This is to ensure that the data is only processed where there is a clear legal basis to do so and, any risks relating to data protection are highlighted at an early stage and can be appropriately managed. To help you decide which type of assessment is required, please complete these screening questions.

Approval of Sensitive Research

Coventry University Group accepts its legal duty of care to ensure that any negative issues relating to sensitive areas in research projects are minimised and appropriately controlled. It is the belief of the University that with good planning it is possible for innovative research to be carried out without exposing people to unnecessary risks.

Approval of sensitive research should ensure the potential risks involved have been evaluated, and are proportionate and balanced by the potential benefits from the research outcomes. The ethics application and associated risk assessment should include ensuring any potential mechanisms for harm have been identified, evaluated and appropriate mitigations to minimise risks have been identified and included within the research proposal.

Roles and Responsibilities

- Principal investigators (PI) hold responsibility for their research team.
- Research supervisors hold responsibility for student research projects.
- The day-to-day responsibility to control risks in specific research projects, is delegated to those who have the greatest awareness and control over the research i.e. researchers and their research supervisors. This is supported by an approval process for research projects.
- Senior management should ensure procedures are in place to identify and evaluate potentially sensitive research projects at the proposal stage.
- Ethics leads and local Research Ethics Committees, should ensure ethics procedures include clear instruction about the need for early evaluation of project proposals to determine if they should be considered as sensitive areas and ensure appropriate evaluation of risks is in place.
- All researchers should understand the University's stance on research on sensitive areas and ensure any research proposals identify and evaluate the potential sensitivity of their project at the proposal stage.

Risk Management

Risks should be managed appropriately with the relevant support, which can depend on which level of the research lifecycle the project is at. The below table should assist in identifying the support and risk assessments required.

At research proposal application level	Staff involved in proposals aligned with sensitive areas of research should seek support, as a compulsory measure, from their line managers and research senior managers such as Associate Deans of Research (ADRs), or equivalent in University Research Centres. An assessment of the potential risks involved and any resources required to mitigate them should be conducted jointly by the PI and Research Support staff.
At proposal implementation level	PIs and Research Support staff should be aware of the sensitivity related to such projects and the mitigations required to manage associated risks.
At ethical approval level	Ethics questions related to sensitive areas of research are incorporated into the ethics application online system to flag an alert and seek a recommendation from ethics reviewers/authorisers. Text boxes should be completed where necessary to expand on an answer to a particular question and to show evidence on how the associated risks will be mitigated. Where relevant, a risk assessment should be attached to the application.
At publication level	PIs/Faculty and Research Centres during peer-reviewing process, archiving and recording on PURE should be made aware of the sensitive nature of such outputs or dissemination activities. Staff and students should be aware of related publication and dissemination policies.

Training

All persons involved in sensitive areas of research should be competent, which includes having sufficient skills, knowledge, training and experience. The University has a strong commitment to the development of researcher's skills. It provides training and development opportunities for their researchers and the necessary resources to enable them to conduct research to the required standards, including Research Ethics and Research Integrity. Staff and students should ensure that they have the necessary skills, training and resources to carry out research in the proposed research team or through collaboration with specialists in relevant fields, and report and resolve any unmet needs identified.

Further Information

For further information, contact the University Group Research Ethics Committee
ethics.uni@coventry.ac.uk

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