

Committee for Research Ethics & Governance in Arts, Social Sciences & Business

Policy and Procedure for the Ethical Review of Research

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1. Introduction

This document sets out the Committee policy on the ethical review of research activity. It adheres to University requirements and reflects sector developments which oblige research institutions and individual researchers to ensure that all research activity meets the highest ethical standards¹.

The policy is designed to meet as a minimum, institutional requirements for ethical review and those of various funders of arts, humanities and social science research. In addition, consideration has been given to guidance from professional associations relevant to the research that takes place within the Schools.

The policy of ethical review applies to all research activity carried out by staff and students across the Schools. The Committee recognises its duty to promote a culture which supports good practice in research, and the policy acknowledges that individual researchers have ultimate responsibility for ensuring that potential ethical issues are fully addressed when undertaking any and all research activity.

Carrying out research in an ethical and professional manner requires the balancing of a number of different principles which are frequently in tension with each other, and often requires researchers to make difficult professional decisions. The policy has been developed to recognise and respect different disciplinary and professional requirements, and requirements are based on the principle of proportionality.

An efficient and successful process for ethical review requires engagement from all relevant parties. With this in mind, the process has been designed to be supportive, collaborative and non-cumbersome. In addition to providing ethical oversight of research practice, it is intended to raise awareness of ethical issues and the increasing focus on this across the higher education sector. Ethical policy and practice within the Schools will be reviewed as understanding evolves.

2. Background

The University's Research Policy Committee (RPC) is responsible for the development of the University's [Research Governance Handbook](#) ². The Handbook clearly sets out the University's expectations from researchers throughout the institution and the administrative structures within which they operate, with the intention of ensuring that the University achieves the highest standards of research governance accountability and responsibility. The Handbook has been reviewed on an annual basis, with the current version updated in November 2019.

The University defines research as:

Any form of disciplined enquiry which aims to contribute towards a body of knowledge or theory.

The Committee policy for the Ethical Review of Research (Ethics Policy) uses this definition of research and the requirements of the policy to apply to all research activity, not only that for which external funding is sought.

¹ For the purposes of this Policy the general ethical principles are the adoption of the values of 'doing positive good' and 'the avoidance of harm'

² Incorporating the University Research Ethics Framework and the Institutional Statement on the Handling of Allegations of Unacceptable Research Conduct.

Further to this, the RPC provides overarching guidelines on the scope and operation of ethical approval processes. Its remit is to:

- Develop policy and guidance on research governance and ethical issues;
- Provide oversight of all research-related ethical issues within the University and ensure that appropriate structures are in place to encourage best practice.

The University requires each Ethics Committee to manage its own ethical review processes to ensure ethical scrutiny of all research projects before they can commence.

The Ethics Policy ensures that all research activity is subject to appropriate ethical scrutiny **before** the research activity commences (and certainly before collecting or using any data). It also ensures that any subsequent changes to the research activity will be submitted for further ethical review.

The Ethics Policy considers directly the ethical review requirements of relevant external funding bodies. The most notable examples of this are the Economic and Social Research Council, which will not fund research in institutions that do not have research ethics review policies that meet their minimum requirements, and the Arts and Humanities Research Council which requires Research Organisations to consider ethics in broad terms and grant approval to researchers in advance of the commencement of research activity. In addition, consideration has been given to Professional Associations which have codes of ethical practice to which they require their members to adhere (Appendix 2).

3. Principles

The underlying principles of the Ethics Policy are:

- Upholding scientific standards;
- Promoting honesty, integrity and credibility in research;
- Responsibility and accountability;
- Avoidance of social and personal harm;
- Respect;
- Compliance with all legal and ethical requirements (on behalf of the University and the individual researcher) relevant to the field of study;
- Proportionality.

While respecting the ethical traditions of disciplines, we can recognise that strong ethical principles are the common ground on which all disciplines meet. Ethics are about research quality and integrity, in order to ensure the best possible research; how research is conducted from start to finish; how those involved in research (and those affected by it) are treated; communicating research goals, procedures and findings as clearly as possible and recognising that research is supported by, and part of, wider society. Ethical principles are also important when considering the safe storage of, and where appropriate, access to, research data and the dissemination of findings subsequent to the activity of gathering data.

4. Good Research Practice

Prior to, during, and following the completion of all research activities, researchers are expected to consider how they can ensure good practice. In preparation for and during research activity, especially that which involves human participants, researchers are expected to consider the ethical implications of their research. Considerations include the nature of the research and the cultural, economic, psychological, physical, political, religious, spiritual and social consequences for all participants.

5. Research Governance and Ethics Policy

Whilst the ultimate responsibility for good practice and the ethical conduct of research lies with each researcher, the Ethics policy is designed to support researchers when considering the wider consequences of their work.

A [checklist](#) of good research practice has been developed which researchers should consider when preparing for ethical review of research activity. This checklist provides guidance on some of the areas that should be considered when considering potential ethical consequences of research activity.

In accordance with University requirements, the Committee will ensure that all staff and students are made aware of the policy and provide opportunities for researchers to engage with institutional ethics training. School Ethics Officers will be responsible for monitoring compliance with the policy within their Schools and, through appropriate dissemination, will ensure that colleagues are aware of their responsibilities under the policy.

This policy applies to all research activity involving researchers within the Schools whether or not it is funded. Heads of School are responsible for any research performed in their School, and for ensuring the implementation of this policy. Guidance on any issues relating to research ethics should be sought from the appropriate School Ethics Officer.

Benefits that are expected through compliance with the policy are:

- Further embedding a research culture based upon good research principles;
- Demonstrating commitment to high-quality, transparent and accountable research practices;
- Ensuring the protection of the dignity, rights, safety and well-being of the subjects³ of research;
- Codifying the Committee's position on research governance and research ethics, affirming our commitment to high ethical standards;
- Providing clear guidance for staff and students;
- Ensuring that all risks relating to research are closely considered, allowing steps to be taken to minimise risks to research subjects.
- Reducing risks to the University, the Schools and individual researchers;
- Strengthening the eligibility and quality of research funding applications.

In order to meet the commitment to proportionality in the process of the ethical review for

³ For the purposes of the policy, the term 'research subjects' encompasses all those who might be affected by the research from planning stages through data collection and following the publication of findings. This includes the observation of people and the use of secondary data and public engagement activity attached to research.

research, researchers will be individually responsible for determining whether their own research activity requires formal ethical review within the terms of this policy. Formal ethical review is required where:

- Research activity (including public engagement) involves human participants (or their remains);
- There are any issues which might raise ethical concerns (for example, potential conflicts of interest; the use of artefacts; environmental impact; financial inducements for participants);
- Research activity might involve the sharing of data or confidential information beyond the initial consent given (including where research relies solely on secondary data);
- It is a requirement for external funding;
- Research methodologies have changed since a previous award of ethical approval.

6. Committee for Research Governance & Ethics in Arts, Social Sciences & Business (CREGASSB)

6.1 Committee Policy

The Committee Policy (revised in December 2019) states the responsibilities of the Committee ('Terms of Reference') as being:

1. To be responsible for the ongoing revision of the Ethics Policy in the Schools of Business; Divinity, History & Philosophy; Education; Language, Literature, Music & Visual Culture; Law; and Social Sciences and monitoring its implementation;
2. To develop policy and guidelines in accordance with research good practice and ethical issues as they relate to research undertaken in all areas of the Schools;
3. To keep apprised of developments in research ethics and good practice as applicable to the research disciplines in the Schools;
4. To review all applications made by staff and postgraduate research students for ethical approval received from the Schools (and other areas of the University as necessary) either through online or full Committee review.^{4,5};
5. To give written decisions and, as appropriate, feedback for all applications received. This will be provided either through email (for those reviewed by the online application process) or through minutes (for those considered at meetings of the Committee)⁶;
6. To record and archive all applications, practices and decisions relating to the ethical review of research;
7. (Through School Ethics Officers) to ensure that researchers (staff and students) within the Schools are provided with information on good practice and ethical review requirements of the University, the Schools and disciplinary associations relevant to their research;
8. To ensure that staff and students in the Schools receive appropriate opportunities to take part in training in good research practice and ethical matters;
9. To report to the appropriate bodies in the University.

⁴ To avoid potential delays in granting ethical approval of research activity, ethical review will normally be carried out via the online ethics approval process.

⁵ Where an application needs to be considered by the full Committee the Principal Investigator will be invited to attend the meeting.

⁶ It is not the intention of the Policy that research should be prevented. Rather, feedback will aim to enable the Principal Investigator to re-consider those aspects that have cause concern for the Committee prior to resubmission of a revised proposal.

When a particular issue of research ethics cannot be resolved through either online review or in discussion with the Committee, the Chair will defer adjudication to the University's Research Policy Committee.

The Chair will be invited to present an annual report on the Committee's activities to the Research Policy Committee. The Dean for Cultural Strategy and Research Governance is a member of the Research Policy Committee, and will, on behalf of the Chair, be responsible for maintaining a routine line of communication between this Committee, the Research Policy Committee and the Vice-Principal for Research & Knowledge Exchange.

6.2 Membership

- Chair - A senior academic from Arts, Social Sciences & Business, appointed on the recommendation of the Vice-Principal for Research & Knowledge Exchange
- Dean for Cultural Strategy and Research Governance (if not Chair)
- One Academic member of staff from each of the Schools of Business; Divinity, History & Philosophy; Education; Language, Literature, Music & Visual Culture; Law; and Social Sciences (the School Ethics Officer, or where necessary, the Deputy School Ethics Officer – both nominated by the Head of School)
- A senior academic from outside the Schools with relevant experience (appointed by the Vice-Principal for Research & Knowledge Exchange on the recommendation of the Committee Chair)
- A senior representative from IT Services (appointed by the Committee Chair or the Dean for Cultural Strategy and Research Governance) to provide advice and guidance on ethical issues as they relate to information technology.

The Committee may also invite other members of staff to participate in Committee meetings, as necessary.

6.3 Committee Remit

The remit of the Committee is as follows:

The Committee for Research Ethics & Governance in Arts, Social Sciences and Business is responsible for maintaining and reviewing the Committee's Research Governance and Ethics Policy, and for reviewing and adjudicating on all applications for ethical approval made by staff and postgraduate research students within the Schools.

6.4 Relationship of the Committee with the University's Ethical Governance Structures

The Committee provides regular reports relating to ethical issues, reflects on wider ethical structures, provides opinions on where these might be adapted or changed, and provides input on any other matters relating to research governance within the Schools and to the University's Research Policy Committee. The Dean for Cultural Strategy and Research Governance is a member of the Research Policy Committee, and will, where appropriate, provide feedback to the members of the Committee on how policy decisions made by the University Committee will apply to the Schools.

The Committee provides advocacy on how the disciplines within the Schools operate and represents the needs of the Schools so that University policy can be informed by its practices.

The University Research Policy Committee has overarching responsibility for managing the University's research ethics and governance arrangements and is a Committee of Court and

Senate.

Across the University, the Deans for Research provide an interface between their local ethics governance structures and the University's Research Policy Committee, and also a link across the disciplines.

6.5 School Ethics Officers

This guidance is not intended to be exhaustive, however, it should be useful for both Ethics Officers and Heads of School when considering the requirements of the role. Heads of School have committed to ensuring that the commitments of School Ethics Officers are reflected in workload allocation.

Each School will designate an Ethics Officer and, normally, a Deputy⁷. The responsibilities of the School Ethics Officer are to:

- Be a member of the Committee for Research Ethics & Governance in Arts, Social Sciences & Business and participate in discussions of the Committee⁸;
- Complete the University's online research ethics training course. If required, provide training on research ethics to colleagues and students across the institution. (Deputy Ethics Officers will not be required to provide training.);
- Ensure that there are effective mechanisms to bring any policy, guidelines or procedures developed by the University concerning the good conduct of research and research ethics to the attention of staff and students in the School. Mechanisms must make it clear that it is a University requirement that policies, guidelines and procedures are followed;
- Ensure that the Policy & Procedure for the Ethical Review of Research and any additional guidance developed by the group or the institutional Research Policy Committee are communicated to all staff and students within the School (this includes ensuring that all colleagues are aware of their own responsibility to apply for ethical review of research proposals as required by the policy);
- Be aware of relevant professional guidelines and other external guidance relevant to all disciplines within their School, and bring details of ongoing developments to the attention of staff and students within their School and to the Committee⁹;
- Advise faculty and students on matters relating to ethical scrutiny;
- Keep ethical issues in the School under review, and normally be members of School Research Committees or equivalent;
- Manage and monitor the implementation of research ethics procedures within the School;
- Ensure that appropriate records of applications and decisions for ethical review of research activity are kept for the School;
- Report to the Head of School and the Committee where appropriate, on research ethics issues;
- Undertake the review of applications for the ethical approval of research activity;¹⁰

⁷ The decision on whether or not to appoint a Deputy Officer will lie with the Head of School. The Deputy Officer will represent the School at CREGASSB meetings, share the responsibilities of the review process and help raise awareness of research ethics at School level.

⁸ The Committee will meet twice per year, or as appropriate.

⁹ Each School Ethics Officer must ensure that the Committee is informed of ethical expectations specific to research areas in their School.

¹⁰ This includes first level review of applications from within the School (to ensure that applications have been completed correctly)

- Provide advice to colleagues on matters relating to research ethics (including advising on the completion of the application form for the ethical review of research).

6.5.1 Period of Office

The period of office will normally be four years, with the opportunity to renew/extend the appointment by agreement with the Head of School and the Chair of the Committee.

6.5.2 Additional Support

Newly appointed School Ethics Officers will receive mentoring from a Committee member. Further support and guidance will also be available from the Chair of the Committee.

6.6 Committee Research Ethics and Governance Administrator

The University will designate an administrator to be responsible for the administration of the Ethics Policy. They will report to the Dean for Cultural Strategy and Research Governance (and the Committee Chair where different) and be responsible for:

- The organisation of meetings of the Committee, including the taking of minutes;
- The maintenance of the Research Ethics webpages and (in consultation with appropriate colleagues in IT Services) ensuring that the electronic process for ethical review is functioning properly;
- Ensuring that decisions made by the Committee are communicated to applicants;
- Bringing to each meeting of the Committee a report on all decisions made via the online application procedure, and taken by Chair's¹¹ action, since its last meeting;
- Drafting reports on the work of the Committee (to be approved by the Chair) to be presented to the University's Research Policy Committee.

7. Application Procedures

Where research activity includes any of the elements highlighted in section 5, each researcher (staff and students) is responsible for ensuring that they have adequate ethical approval. To gain approval, a researcher must complete an application for ethical approval of research activity (see 7.1, 7.2 or 7.3).

Where the application relates to a specific research project the application should be made by the Principal Investigator on the project.

Where a researcher is not embarking on a clearly defined research project, formal ethical approval of any ongoing research activity is required on a biennial basis.

In addition, any new courses which contain an element of research are subject to the terms of the Ethics Policy. This includes taught courses requiring research involving human participants. In these cases, the application form for ethical approval should be completed by the Course Co-ordinator. (For existing courses, Schools are responsible for internal review of 'research-based teaching' including review of UG and PGT dissertation modules.)

and full review of applications from colleagues/PhD students in other Schools associated with the Committee.

¹¹ The Chair may alone or in consultation with one or more members of the Committee, make a decision on an application that is not eligible for the expedited procedure. This would normally only be in exceptional circumstances and when a decision cannot be delayed until the next scheduled meeting of the Committee.

A copy of the application form is available [here](#).

When making an application for the ethical approval of research activity, researchers should first refer to the [Checklist of Good Research Practice](#) and contact their School Ethics Officer (or deputy) for advice on completing the application.

The application form (in combination with the checklist) has been developed with the intention of raising awareness of potential ethical considerations for the diverse research activity that takes place across the Schools. Colleagues are encouraged to be as thorough as possible when completing the application as ethical approval can only be granted for those research activities which are specified thereon. Should research methods ultimately differ from those presented within an approved application, the researcher will be responsible for ensuring that a new application is made to cover any additional activity. Similarly, if a researcher subsequently embarks on a piece of clearly defined research, they will be required to submit another application for ethical approval specific to the project.

Researchers should not regard the form as a 'box-ticking' exercise and must provide enough information to show the reviewer that they have fully considered the possible ethical implications of their research, allowing for an informed judgement to be taken by the reviewer before granting approval.

In considering requests for ethical review, the Committee will review guidance from relevant research agencies. Applications will need to demonstrate that the research follows good practice guidelines and addresses all relevant ethical issues including: safety and well-being; obtaining appropriate informed consent¹² (including when the research involves vulnerable adults or children, or where it is proposed to use covert observation); payment to participants; principles of anonymity; confidentiality; and the General Data Protection Regulation and the Data Protection Act 2018.

Where an application for ethical review is received, except where a full Committee review is required, a decision will normally be made within five working days.¹³

As per the University Records retention schedule, applications for ethical approval of research submitted by staff/postgraduate research students will be retained until the end of the project plus six years. For applications submitted by undergraduate or postgraduate taught students, these will be retained until the end of the student's programme of study plus six years.

7.1 Staff Applications

Staff applications should be submitted using the [online process](#).

Once the application form has been completed, the applicant must attach any other relevant documentation (e.g. the research project proposal, consent forms, information sheet, etc.).

Once the researcher has submitted the online form, it will be forwarded to the School Research Ethics Officer for scrutiny. If the form has been completed correctly, it will be passed to the Committee for approval either through the expedited or full Committee procedures. The School Research Ethics Officer and the applicant will be informed of the reviewer's decision.

¹² Researchers will be required to demonstrate how research participants will be informed in advance of giving consent.

¹³ Subject to operational requirements and potential delays outwith term-time.

7.2 Research Postgraduate Student Applications

PGR applications should be submitted using the [online process](#), whereby it will follow the same process for staff research projects (as per 7.1 above).

7.3 Undergraduate and Taught Postgraduate Student Applications

Undergraduate and Taught Postgraduate applications for ethical review are managed within the Schools, using a [downloadable 'Word' application form](#). The completed application form should then be emailed to the student's supervisor for full ethical review¹⁴. The School Ethics Officer will provide advice and assistance to supervisors on request.

7.4 Appeals

In the event that ethical approval is refused, the applicant will be invited in the first instance to revise their research proposal or further explain the reasons for the research methodology which is proposed. If this is not appropriate, the researcher has the right to appeal the Committee's decision to the University's Research Policy Committee using the procedures put in place by that Committee.

7.5 Exceptions

Some of the University's research will fall under the remit of an NHS Research Ethics Committee e.g. the [North of Scotland Research Ethics Service \(NoSRES\)](#) or other equivalent NHS ethics services. Advice on the correct process for obtaining ethical approval of research **must** be sought from researchgovernance@abdn.ac.uk for any research involving:

- **NHS patients, their tissue or data.** This includes research involving individuals when their status as NHS patients is relevant to the research, even when a medical condition is not the subject of the research; and/or
- **Participants who do not have the capacity to consent to participate;** and/or
- **NHS staff participating by virtue of their profession** (i.e. NHS staff who will carry out study duties on behalf of the research team such as clinical examinations, blood sampling, imaging, etc.); and/or
- The use of **NHS premises, equipment or facilities.**

The proposed research must also be discussed with the appropriate School Ethics Officer.

Sponsorship for clinical research involving the NHS is arranged using the guidelines, templates and links available on the [clinical research governance webpages](#) and the Standard Operating Procedures and templates are available [here](#). Any queries should be directed to researchgovernance@abdn.ac.uk.

7.6 External Ethical Approval

Should an applicant require access to participants through other organisations then they must contact the organisation, establish the mechanism for obtaining consent and take appropriate action to meet their internal requirements. However this does **not** override the requirement to meet with this University's requirements in relation to ethical approval of research.

Once the research has received external ethical approval, formal evidence of that approval

¹⁴ All colleagues with any undergraduate or taught postgraduate supervisory responsibility are therefore required to engage fully with the process of ethical review to ensure that they can fully consider the ethical implications of any research carried out by their students.

will **normally** be accepted as sufficient to meet the University's own requirements, however confirmation that this approval meets with the University's requirements should be sought from this Committee. Where the Committee is not satisfied that the review process provided by the external institution/organisation meets our own standards, further institutional review will be required.

For staff who are participating in a research project where the Principal Investigator (PI) is based at another institution, the primary responsibility for securing relevant ethical approval lies with the institution that employs the PI.

Where there is conflict between local customs and the ethical principles and values set out by the University this should be brought to the attention of the Chair of the ethics committee in the first instance, and also the Research Policy Committee.

For postgraduate research students who are undertaking a research degree programme as part of a validation agreement with an external institution, ethical approval should initially be sought from the external institution. A copy of the approved ethics application should then be submitted to this Committee in order to ensure it satisfies the requirements of the Committee's research ethics approval procedures.

For students undertaking research at an external Aberdeen University campus, applications for ethical approval will be submitted using the appropriate Aberdeen process e.g. via word version of the application form for undergraduate students. External staff supervising these students will be required to undertake the online ethics training course to ensure they understand the required standards for ethical research, as they will be responsible for undertaking the ethical review of applications submitted by their students. School Ethics Officers at the University of Aberdeen will not be involved in reviewing ethics applications from external campuses unless additional guidance is requested. The external campus will be required to submit an annual report to the Committee on the operation of the ethics review process at the external campus e.g. number of applications received and approved, any issues arising, etc.

7.7 Formal Notifications

Once ethical review has been carried out, the applicant will be advised via email of the Committee's decision. Where formal confirmation of ethical approval is required (e.g. for presentation to external partners), researchers should contact their School Ethics Officer in the first instance, who will arrange for a letter of confirmation, on headed paper, to be provided by the Committee Clerk.

Appendix 1 – Guidance Email to Staff & Postgraduate Research Students

Policy and Procedure for the Ethical Review of Research

The revised policy for ethical review will require colleagues to determine whether or not their research activity requires ethical scrutiny.

To remind researchers of the requirement to consider the potential need for formal ethical approval of their research activity, the following email will be issued to all staff and postgraduate research students on a quarterly basis:

Dear Colleague

Applying for Ethical Approval

What is happening?

Research-active staff and students are reminded that you have a responsibility to apply for [ethical approval](#) if your research project or research-related activity involves any of the following:

- Your research involves human participants (or their remains);
- There are any issues which might raise ethical concerns during proposed research activity (for example, potential conflicts of interest; the use of artefacts; environmental impact; financial inducements for participants);
- Your research activity might involve the sharing of data or confidential information beyond the initial consent given (including where research relies solely on secondary data);
- It is a requirement of external funding for your research;
- Your research methodologies have changed since a previous award of ethical approval.

This [checklist](#) has been developed for reference and should be reviewed to help determine whether or not review is required, and also when completing an application.

What do you need to do?

- Where required, obtain [ethical approval](#) before you commence your research project or activity.
- Ethical approval may also be required for project or dissertation work undertaken by undergraduate or postgraduate taught students. UG and PGT Course Coordinators / Supervisors should ensure that, where applicable, students are made aware of and adhere to these requirements.

Additional Information:

- If you require further assistance, please contact the [Ethics Committee member from your School](#) (see 'Committee for Research Ethics & Governance in Arts, Social Sciences & Business').

- All postgraduate research students are required to complete [Research Ethics and Governance Training](#). This training is also strongly recommended for all staff engaged in research.

Best wishes

Michael Brown, Dean for Cultural Strategy & Research Governance and Elizabeth Curtis,
Ethics Committee Chair

Appendix 2 – Additional Resources

Institutional Documents

[Research Governance Handbook](#)

[Code of Practice on Conflicts of Interest](#)

[Code of Practice on Student Discipline \(including Academic Misconduct\)](#)

[Code of Practice for Postgraduate Taught Students, Programme Co-ordinators, Course Co-ordinators and Heads of School](#)

[Code of Practice for Research Students, Supervisors, Heads of School, Graduate School Officers and Dean of Postgraduate Research School](#)

[University Data Protection Policy](#)

[Disciplinary Procedures \(Staff\)](#)

[Good Research Conduct and Handling of Allegations of Unacceptable Research Conduct \(section 4, Research Governance Handbook\)](#)

[Guidelines on Keeping Research Records](#)

[Grievance Procedure](#)

[Policy & Procedure on Public Interest Disclosure \(Whistleblowing\)](#)

External Documents

[UKRI: Policy and Guidelines on Governance of Good Research Conduct](#)

[UKRIO: Code of Practice for Research: Promoting Good Practice and Preventing Misconduct](#)

[Respect Code of Practice for Socio-Economic Research](#)

[ESRC Framework for Research Ethics](#)

[MRC Ethics Series - Good research practice: Principles and guidelines](#)

[Universal Ethical Code for Scientists](#)

[Social Research Association Ethical Guidelines](#)

[British Sociological Association Statement of Ethical Practice](#)

[Social Anthropologists Ethical Guidelines for Good Research Practice](#)

[Socio-Legal Studies Association Statement of Principles of Ethical Research Practice](#)