

Document Title	cument Title RESEARCH ETHICS POLICY AND PROCEDURE					
Document Number	074	Document Revision	Е	Date Issued	5/12/19	

Document categ	jory	,	and procedure					
			BoG as per resolution 09/2019					
users to be notif	fied upon	Princip Direct	pal & CEO, Deputy Principals, Directors, Deputy ors					
Document change history								
Tracking Number	Date released		Change originator					
			Dalmas P					
Previous docume	ent number AC-PO-0	04 -12 - V	'er1.0					
Document Change Tracking Number	Date released		Change originator					
053/2015	10/12/15		Rizzo Alex					
Change history (Section/change details)								
· ·								
Tracking Number	Date released		Change originator					
		10/3/16 Rizzo Alex						
	<u> </u>							
paragraph 3.			thics Committee and MCAST Research Committee I nitial Research Proposal – Statement of Intent' in					
Document Change Tracking Number	Date released		Change originator					
33/2019	19.09.2019		Albert Agius					
Change history	(Section/change	details)						
Updated Designations: Head of College → Deputy Principal; DDPM → Deputy Principal Updated Instructions for document Users Updated reference to Data Protection ACT → GDPR Updated reference to SMT → EMT								
Document Change Tracking Number	Date released		Change originator					
078/2019	5/12/19		Rizzo Alex					
Change history	(Section/change	details)						
Updated paragraphs 3.3, 3.14 (a) and (b) Included Appendix 1 Reference to Doc 181 'Research Proposal Form (Internal and external senior researchers)								
	Document catego Document appromise Minimum list of users to be notificated to be not	Document Change Tracking Number Date released N/A 2015 Change history (Section/change of Previous document number AC-PO-Document Change Tracking Number Date released 053/2015 10/12/15 Change history (Section/change of General updates to document Document Change Tracking Number 033/2016 10/3/16 Change history (Section/change of General updated terminology referring to Month paragraph 3. Added reference to Document Document Change of General updated terminology referring to Month paragraph 3. Added reference to Document Document Change of Tracking Number Date released 33/2019 19.09.2019 Change history (Section/change of Updated Designations: Head of Coll Updated reference to Data Protection Updated reference to SMT → EMT Document Change Tracking Number Date released 078/2019 5/12/19 Change history (Section/change of Updated paragraphs 3.3, 3.14 (a) a Included Appendix 1	Document approver BoG and					

Instructions for document users with access to College website

All MCAST employees can access current, controlled and approved documents related to the Quality Management System via the College website <u>www.mcast.edu.mt</u>.

Document users are encouraged **NOT** to retain printed hard copies of the Quality Management System documents. If, however, a hard copy of the document is required, the user is to ensure before use that the printed document is the current revision.



Document Title	RESEARCH ETHICS POLICY AND PROCEDURE					
Document Number	074	Document Revision	Е	Date Issued	5/12/19	

Continuous Improvement

Procedures are meant to be 'living' documents that need to be followed, implemented and maintained. If the procedure does not reflect the current, correct work practice, it needs to be updated! Contact your Document Controller on Ext 7121 **today!**



Document Title	RESEARCH ETHIC	Page 3 of 13			
Document Number	074	Document Revision	E	Date Issued	5/12/19

1. Preamble

- 1.1 Since its inception in 2001, MCAST has developed and strengthened its provision of Vocational Education and Training programmes. Research is currently conducted at MQF/EQF Level 5, 6 and 7 programmes, as well as through project-based research that is often externally funded.
- 1.2This policy, with its procedures, addresses the need of assisting those who make research requests at MCAST, whether they concern College members (students and staff) or non-MCAST researchers, that is, non-MCAST persons who may wish to carry out their research at MCAST). Research is never a straightforward discussion, given its complex and overall importance in the fields of knowledge and, particularly for MCAST, in the educational and training aspects of vocational sectors.
- 1.3 This policy keeps all those who are somehow engaged in research at the centre of its attention. As human beings, our quest for knowledge is an on-going process and the subject of changes and challenges, this policy will be reviewed officially every two years, while MCAST reserves the right to propose and sanction any amendments and additions which may be useful for researchers on its premises at any time of its academic year.

2. Definition of Research

- 2.1 Research should be the way one constantly updates one's knowledge and the way it should be conducted as part of the majority of curricula offered in courses at Level 5, Level 6, and higher at MCAST.
- 2.2 As an educational Institution, MCAST aims to extend knowledge and understanding in all the areas taught at the college and by means of all perspectives, namely, learners, educators, policymakers and the public. The community of individuals who are both part of and who may be external to MCAST, and for whom these guidelines are intended, would have multidisciplinary backgrounds.
- 2.3 Within the paradigms and methodologies espoused by these various disciplines, some concepts may not have a common understanding. Examples might include what is meant by 'data', 'reliability', 'validity', 'subjectivity' and 'objectivity'.
- 2.4These guidelines thus recognize the legitimacy of different research methodologies as governed by the multi-disciplinary backgrounds of the individuals which operate both at MCAST and also outside MCAST.
- 2.5 The MCAST Research Ethics Committee (REC) seeks to ensure that these guidelines do not selectively judge or constrain, directly or indirectly, the methodological distinctions between subject areas and the research methods that emanate from them.



Document Title	ocument Title RESEARCH ETHICS POLICY AND PROCEDURE					
Document Number	074	Document Revision	Е	Date Issued	5/12/19	

3. Constitution of and Terms of Reference for the MCAST Research Ethics Committee (REC)

- 3.1 The Principal and CEO, in consultation with the Executive Management Team (EMT) will appoint persons to form part of the MCAST Research Ethics Committee (REC), and will also appoint a Research Ethics Appeals Committee (REAC).
- 3.2The REC will be made up of a committee that responds to the MCAST Corporate Research Committee (CRC) that falls under the direct remit of the Deputy Principal for Research & Innovation. (Refer to MCAST Research Framework as approved by Board of Governors resolution BOG 9_2019 for Terms of Reference and composition of committee https://www.mcast.edu.mt/wp-content/uploads/Regulatory-and-Operational-Framework-for-Applied-Research Final-BOG-Approved-Document V5.pdf
- 3.3The REC shall comprise a task-force that is chaired by the Deputy Principal for Research & Innovation and will include a minimum of two other members. The first member shall be the MCAST Director of Research & Innovation, who also acts as the executive REC secretary to the task-force. The second member shall be one of the six Senior Research Officers who is acting to represent the Institute for which the ethics reviews would be taking place. Thus, for an ethics review for a particular institute, the Senior Research Officer attached to that particular institute would form part of the corresponding task-force. The Deputy Principal for Research & Innovation shall also consult with the Deputy Principals for STEM and for Arts/Social Sciences, to ascertain whether further expert contributors would be invited to join the task-force according to necessity.
- 3.4All the REC members should be at least in possession of a Masters' degree, and have adequate experience in applying research methods and carrying out research endeavours.
- 3.5 All REC members are expected to refrain from taking part in any Committee session/s which indicate/s in advance the possibility of conflicts of interest. In such circumstances, the Committee member/s have to inform the Committee/s' Chair in writing as soon as the member is aware of such possible conflict.
- 3.6 Any REC member who needs to present a research request to MCAST will not form part of the committee for issues relating to that request.
- 3.7The REC secretary will be mainly responsible for the preparation of the committees' agenda, the collection of all required documents for the meeting, to inform all committee members about the meeting date, time and venue at least seven working days prior to the meeting, to keep the minutes of the meeting, and to file all minutes and documents in a safe place.
- 3.8 The REC will be requested to conduct its business in the shortest possible time. The REC is expected to communicate its decisions in writing to the person/s concerned.

Terms of Reference for the REC

3.9 The REC's primary objective is to maintain high ethical standards in the conduct of research at MCAST. It is expected to cater for the well-being of all MCAST and non-MCAST stakeholders who are involved in some way or another in any kind of research at MCAST.



Doc	ument Title	RESEARCH ETH	Page 5 of 13			
Doc	ument Number	074	Document Revision	Е	Date Issued	5/12/19

Above all, it must strive to retain MCAST's reputation for excellence in the field of academic research.

- 3.10 REC members are appointed for a three-year period. In case of misconduct, the Principal may appoint their replacement.
- 3.11 The REC is directly accountable to the MCAST Corporate Research Committee that operates under the Office of the Principal.
- 3.12 The REC members cannot sit on the EAC during the same period of their appointment as EC members.
- 3.13 The REC is entitled to invite persons who have reliable expertise in specific fields of knowledge to participate in its meetings in their advisory capacity.
- 3.14 The REC is particularly responsible for the following areas:
 - a. To carry out the ethics review of all research proposals compiled by MCAST students and staff, and to give clearance to students/staff to proceed with their research if deemed ethically sound.
 - b. To carry out an ethics confirmatory exercise on research endeavors launched on, or in collaboration with, MCAST by external parties.
 - c. To promote and enhance good research practices in the field of vocational education and training.
 - d. To advise the Research Committee, the Principal and the COI on ethical issues regarding research taking place in any sector or area related to MCAST.
 - e. To review regularly at least once every year this policy and procedures, and to make its recommendations to the Principal and COI.
 - f. To sample at least five per cent of the decisions taken at Institute level by the Institute's Research Sub-committee (IRC, see Clause 4.3).
 - g. To hold a monthly meeting and to present the meeting minutes to the Research Committee in the latter's next meeting.
 - h. To handle any research queries and issues addressed to it by the Committees of Studies and COI.
 - i. To be involved in all research requests submitted by non-MCAST stakeholders.
 - j.To carry out the final review of research projects (staff and students) when such research projects which entail serious ethical issues are referred to it by the Institute research sub-committee.



- The REAC deals with appeals against decisions reached by the REC. All its decisions 3.15 are final. The Principal & CEO may seek to nominate the MCAST Corporate Appeals Board (Doc 188 Academic and Student Disciplinary Boards) to take on the full duties of the REAC. The REAC shall report directly to the Principal or his delegate.
- In conducting its duties, the REAC will ensure that both the appellant and the competent authority as defined in this policy have observed the principles, policy and procedures as defined in this document.

Reference Documents:

Document Title

Document Number

Doc 188 Academic and Student Disciplinary Boards)

074

4. Research Projects at Institute Level – The Institute Research Committee (IRC)

- 4.1 As part of the research process, students are normally required to produce a research proposal (also called a statement of intent, or SOI) for scrutiny by academic and administrative staff of their respective institute. For this purpose it is required that an Institute research committee (IRC) is formally set up at each and every institute in order to ensure that the proposal presented by each student adequately reflects the criteria issued by the examination bodies and also reflects the ethical guidelines outlined in this document.
- 4.2 For the purposes of efficiency, these guidelines indicate that the ethical considerations should be approved or otherwise within the proposal discussion and that one approval form should be issued for each student to keep and to present in the appendices of the finalized dissertation.
- 4.3 The IRC should be made up of the Institute Director (Chair), one of the Institute's Deputy Directors, and an Institute Vocational Coordinator (IVC) or chosen senior lecturer of that same institute. The IRC is responsible to send a report outlining all decisions to the REC within ten working days of the committee's review of project proposals. The REC will review all research proposals sanctioned by the IRC, and deemed as technically feasible by the IRC. The Institute Director may also invite the Senior Research Officer to form part of the IRC.
- 4.4 Should the REC be in disagreement over any decision or recommendation made, a member of the ERC will consult the respective IRC for clarification and if needed, further recommendations to the student will be given. The REC shall have the power to halt or moderate a research project, should it be deemed that ethical criteria are not being sufficiently respected.
- 4.5 The REC will issue an annual report summarizing decisions and conclusions taken on its ethics reviews of the research proposals that would have been forwarded to it by the IRC and by any other parties. This report will be presented to the MCAST Quality Assurance Office and to the Data and Information Commission as required by law.



Document Title	RESEARCH ETHICS POLICY AND PROCEDURE					
Document Number	074	Document Revision	F	Date Issued	5/12/19	

- 4.6 In instances where research undertaken by students will be similar in nature, only one proposal will need to be presented by the supervisor to the IRC. An example would be the longitudinal study undertaken by students (n=150) reading for the National Diploma in Children's Care, Learning and Development, who would follow the same procedure with different children. The key decisive factor in such instances should be the degree of independent study undertaken by students.
- 4.7 Where research procedures for students following the same course are similar, the approval should be gained for the course rather than for the individual student.
- 4.8 The IRC shall also, with the assistance of the research mentors or supervisors appointed for each student, monitor the ongoing progress and ethical implementation of the student's research project. The IRC shall work by exception here, immediately informing the REC in writing of any potential ethics breach. The REC shall provide immediate guidance or direction to the IRC on how to proceed in such situations.

5. Research Guidelines

- 5.1 All research carried out at MCAST, whether carried out by MCAST students, staff or others should be conducted within an ethic of respect for human subjects, for knowledge, for democratic values, for quality and for academic freedom.
- 5.2 MCAST courses at 'Levels 3 and 4' may include individual projects and activities designed to develop research skills. These projects may be carried out by individual students or small groups. MCAST wishes to encourage learning of research methodologies and techniques by students. Although at 'Levels 3 and 4' these projects may not be intended for publication, yet the potential for risk to participants involved in such research requires that the protocol and consent information be still reviewed by the IRC (cf. 4.1). The approval gained should be based on the course as outlined in 4.6.
- 5.3The collection of data and involvement of human subjects in research will not be permitted until the respective IRC or REC have reviewed and approved the research protocol, and until informed consent has been obtained in accordance with these guidelines.

6. Research Review Procedures

- 6.1 All research protocols involving human subjects will be presented for approval as follows:
 - a.All research carried out by MCAST students and staff will be reviewed and approved by the relevant IRC under the direction of the REC;



Document Title	RESEARCH ETHIC	Page 8 of 13			
Document Number	074	Document Revision	E	Date Issued	5/12/19

- b. All research carried out by non-MCAST stakeholders will be reviewed and approved directly by the REC.
- 6.2The IRC is expected to send a copy of all research requests to the secretary of the REC within 30 working days after the receipt of the same requests.
- 6.3 Researchers/applicants will be notified in writing about the decisions taken. The IRC shall provide the researcher with this written notification not before one month has elapsed from the date of the decision taken, during which time REC reserves the right to over-ride decisions taken by the IRC.
- 6.4The REC or the IRC can approve minor changes in previously approved research during the period for which approval is authorised. The IRC is to inform REC of any changes and provide REC with a copy of these changes. The one-month period mentioned above in Clause 6.3 stands for this clause as well.
- 6.5 The IRC or REC shall provide approval/disapproval in writing to the researcher. In cases of disapproval, reasons for this and an opportunity for the researcher to respond will be given.
- 6.6 In the event that the researcher/applicant is in disagreement with REC's final decision, a written appeal is to be presented to REAC by not later than 10 working days from the date of REC's final decision letter. In the event that the appeal is addressed to the IRC the same procedures apply, however the first appeal is to be presented to REC.

7. Responsibility of the Research Student

- 7.1 Research students shall prepare a full proposal on the application form provided by the REC. This application (refer to Document 164 'Initial Research Proposal Statement of Intent Form') shall be handed in to the respective Institute's IRC. In the protocol, research students shall make provisions for the adequate protection of the rights and welfare of prospective research subjects and ensure that pertinent laws and regulations are observed. Together with the said application, researchers may be required to submit a copy of the following information:
 - a. A sample consent form (English and Maltese);
 - b. A sample Interview schedule / questionnaire / survey or other research instrument;
 - c. A sample recruitment letter (English and Maltese);
 - d.A sample consent form for parents / guardians in the case of children or other vulnerable groups (Maltese and English);
 - e. Institutional approval for access to subjects (where applicable);
 - f. Institutional approval for access to data (where applicable);
 - g. Any other necessary approvals as requested by the REC or IRC.

Reference Document:

Document 164 'Initial Research Proposal – Statement of Intent Form' Document 181 'Research Proposal Form (Internal and External researchers)



Docun	nent Title	RESEARCH ETH	RESEARCH ETHICS POLICY AND PROCEDURE					
Docun	nent Number	074	Document Revision	Е	Date Issued	5/12/19		

8. Responsibilities to Participants

Voluntary informed consent

- 8.1 Informed consent must be voluntarily obtained for all participants without any duress before research begins. The form should clearly state what they will be doing, drawing attention to anything they could conceivable object to subsequently. It should also include how the collected data will be used and how and to whom it will be reported.
- 8.2 Participants must be clearly informed of any involvement in social networking, on-line activities or video based environments. It should also be stated that they can withdraw from the study at any time and that adequate measures are being taken to ensure the confidentiality of data. The language used should be one which the person signing it will understand.
- 8.3 Consideration should be given to any dual roles arising from the research and the impact this can leave on students and colleagues, which must be addressed accordingly.
- 8.4 For research involving more than minimal risk, an explanation as to whether any medical treatments or other therapeutic services are available if injury or harm occurs and, if so, what they consist of, or where further information may be obtained.
- 8.5 A copy of the signed consent form is to be given to the person who signed it. In addition to the participant, the form shall be signed by the Researcher and the Supervisor.
- 8.6 Researchers are to ensure that signed consent forms are stored in a secure place and destroyed once the study is concluded and results of the research are published.

Covert and deceptive research

8.7 Research involving any form of deception can be particularly problematical, and a full explanation of why a covert or deceptive approach is necessary should be provided. This should indicate why there are no acceptable alternative approaches which do not involve deception and the scientific justification for deception.

Right to withdraw

- 8.8 Participants should be told explicitly that they are free to leave the study at any time without jeopardy. It is to be clarified exactly how and when this will be explained to participants.
- 8.9 Participants also have the right to withdraw their data in retrospect, after it has been collected. It needs to be clearly explained how they can do this and at which point. Also clearly stated is the point at which they will not be able to withdraw, as for example after the data has been analysed or disseminated.



Document Title	nent Title RESEARCH ETHICS POLICY AND PROCEDURE					
Document Number	074	Document Revision	Е	Date Issued	5/12/19	

8.10 Researchers need to examine whether they have contributed through their own actions to the decision of a participant to withdraw. Decisions of participants to re-engage need to be taken with care so as to eliminate any oppression or pressure of any form.

Children, vulnerable young people and vulnerable adults

- 8.11 Informed consent shall be sought from the child's legally authorized representative, being the child's parents or guardian in accordance with the laws of Malta. If children are recruited from independent schools, the permission of the head teacher is required. Approval from relevant central authorities is necessary for church and state schools. Children over 12 years should also sign an individual consent form themselves.
- 8.12 Additional safeguards are to be included if the subjects are likely to be vulnerable young people or vulnerable adults, such as persons with physical or mental disability. In these cases, researchers must fully explore alternative ways in which they enable the best possible authentic response.
- 8.13 Research to be carried out in any institution (correctional facility, hospital, etc.) will require permission from the appropriate authority.

 Protection of participants
- 8.14 In cases where participants are at risk of physical, psychological or emotional harm, researchers must take steps to minimize the effects. A description of the nature of the risk and steps to be taken to minimise it is to be specified as already stated.

Confidentiality (data protection)

- 8,15 Researchers must comply with the local General Data Protection Regulation.
- 8.16 The Participant Information Sheet should include information on what the research is for, who will conduct the research, how the personal information will be used, who will have access to the data and how long the data collected will be kept for. This is known as a 'fair processing statement.' All data must be securely stored; whilst consent forms and data should be kept separate. Participants should be given the choice to have their personal data returned to them or destroyed.
- 8.17 Any use of audio or visual recordings of participants should be included on the Participant Information Sheet and consented for by the participants. Identifiable personal information should only be communicated to others within the framework of the act and with the participant's permission.
- 8.18 Participant's anonymity should always be protected unless permission to be identified has been given and clearly consented for.
- 8.19 Researchers are to ensure that any form of publication, including publication on the Internet, does not directly or indirectly lead to a breach of agreed confidentiality and anonymity.

Disclosure



Document Title	RESEARCH ETHICS POLICY AND PROCEDURE				
Document Number	074	Document Revision	F	Date Issued	5/12/19

- 8.20 Participants who in the process of the research, uncover unethical behaviour or reveal details about possible serious harm to themselves or specified others, will be informed that confidentiality will have to be broken and that the relevant authorities would need to be informed.
- 8.21 Researchers must explain to the participants or their guardians or responsible others of their intentions and reasons for disclosure. It is in the researchers' interests to keep written records of such decisions and reasons justifying their decisions in case a complaint or other serious situation arises.

Debriefing

8.22 It is recommended that participants are debriefed at the conclusion of the research. Details of how this will be carried out or reasons why a decision not to conduct debriefing is taken, are to be attached in writing with this application.

Giving advice

8.23 Students should not put themselves in a position of authority from which to provide advice and should in all cases refer participants to suitably qualified and appropriate professionals.

Research in public places

8.24 Particular attention should be given to the implications of research undertaken in public places. The laws of obscenity and public decency are to be observed and consideration to religious and cultural sensitivities is to be regarded.

Animal rights / Environmental protection

- 8.25 Researchers involved in the study of animals are to avoid animal suffering of any kind and should ensure that proper animal husbandry practices are followed. Animals should be regarded and treated as fellow sentient beings.
- 8.26 Any negative impact of research on the natural environment and animal welfare, must be minimised and must be compliant to current legislation. Research should appropriately weigh longer-term research benefit against short-term environmental harm needed to achieve research goals.

Dissemination

8.27 Researchers have a responsibility to disseminate the results of their research for the benefit of other professionals, policy makers and a wider public understanding. This dissemination needs to be carried out appropriately subject to ethical considerations presented in this document.



Document Title	RESEARCH ETHIC	Page 12 of 13			
Document Number	074	Document Revision	E	Date Issued	5/12/19

9. Conclusions

- 9.1 Institute Directors (through use of the IRC) are responsible for the promulgation of this policy, procedures and relevant templates among all their institute students and staff, as well as to give a copy of the same documents to all MCAST students and staff who may wish to present a research request.
- 9.2 This entire document has to be made available on the MCAST website.
- 9.3 The Quality Assurance Office is responsible for the overall monitoring of standards in the implementation of this policy.



Document Title	RESEARCH ETH	Page 13 of 13			
Document Number	074	Document Revision	Е	Date Issued	5/12/19

Appendix 1 : List of Committees (Terms of Reference and Composition)

Acronym	Title	Appointed by	Composition	Terms of Reference		
CRC	Corporate research Committee	Refer to MCAST Research Framework as approved by Board of Governors resolution (ref 9_2019) for Terms of Reference and composition of committee. https://www.mcast.edu.mt/wp-content/uploads/Regulatory-and-Operational-Framework-for-Applied-Research Final-BOG-Approved-Document V5.pdf				
REC	Research Ethics Committee	Principal and CEO in consultation with EMT	DP Research & Innovation (Chair), Director research & Innovation (Executive secretary), Senior Research Officer (representing Institute), Subject Expert (by invitation of Chair).	Para 3.10		
REAC	Research Ethics Appeal Committee	Principal and CEO in consultation with EMT	Substituted by MCAST Corporate Appeals Board	3.15 and refer to Doc 188		
IRC	Institute Research Committee	Principal and CEO	Institute Director (Chair), Deputy Director, Institute Vocational Coordinator (IVC)	Para 4		