



# Essential guidance for research projects in light of the COVID-19 pandemic (for staff, funded fellows, students and contractors)

Revised 31 July 2020

## Introduction

The coronavirus (COVID-19) pandemic has unprecedented implications for university activities, including research. Our main concern is that all of our researchers and participants are safe. This note provides guidance from the University of London Research Ethics Committee on how researchers should proceed in the changed context.

This guidance is **mandatory** for all researchers undertaking research on behalf of the University of London (staff, fellows, contractors, and students), whether members of the School of Advanced Study, University of London Worldwide or University of London in Paris. It applies to all current, ongoing research, and new applications for ethical approval. It covers all researchers.

We understand that the situation is evolving quickly and differently, depending on the country, or even the region. ***This guidance is therefore reviewed regularly but remains in force until further notice.***

### Contact:

[research.ethics@sas.ac.uk](mailto:research.ethics@sas.ac.uk) (default)

UOL worldwide *Global MBA Programme* students must contact [Aurela.Neli@london.ac.uk](mailto:Aurela.Neli@london.ac.uk) or [Dimitrios.Koufopoulos@london.ac.uk](mailto:Dimitrios.Koufopoulos@london.ac.uk)

UOL worldwide staff and CDE must contact [Linda.Amrane-Cooper@london.ac.uk](mailto:Linda.Amrane-Cooper@london.ac.uk)

ULIP students must contact [charlotte.leg@ulip.lon.ac.uk](mailto:charlotte.leg@ulip.lon.ac.uk)

## 1. Mode of data collection

The University of London Research Ethics Committee requires that **all research involving face-to-face interactions with participants continue to be on hold until further notice**. The health and welfare of researchers and participants must be our primary concern.

In light of this guidance, researchers must consider whether they can adapt and reorient their research, for example, by conducting participant interactions remotely. If this is not possible, then, unless an exemption is given (see section 1.2), the research must be suspended until such a time it is permitted to be recommence (see section 2.3), or even abandoned.

### 1.1 Suspending/reorienting research

**Face-to-face data collection is not permitted and must be suspended immediately, if this has not been done already.** If you must suspend data collection that involves face-to-face contact, you must inform your participants of the suspension as soon as possible.

Where possible, the mode of data collection should be changed to use telephone or, preferably, secure end-to-end encrypted VoIP applications (Voice Over Internet Protocol, such as Signal, Facetime or WhatsApp) for interviews or focus groups, online surveys or remote data collection through other appropriate media.

It must be noted that not all research that would normally place in-person can be easily converted into research to be conducted remotely. This is especially so for research with participants who could be considered in any way vulnerable or hard-to-reach, sensitive topics or areas with poor security and for research that requires the recruitment of participants in person or of people that may not have access to the internet. There may be particular issues around the use of social media or other online platforms or communication devices, *please see **appendix for guidance***.

Moreover, as this is a stressful time for all, researchers should note that they may find it difficult to recruit participants willing to take part in their studies/research, especially if they do not have a network of existing contacts.

Finally, the change in the mode of data collection may also give rise to distinct ethical and legal issues, as well as compromising quality and standards. Therefore, these issues must be carefully considered and the change of methodology may require further ethical approval (see section 2 and social media guidance).

**Students engaged in research involving face-to-face interactions, or planning to engage in such research**, should, in the first instance, seek advice from course tutors and supervisors through their departments. All alternative options should be considered including whether projects can instead be undertaken using secondary data and desk-based research.

The Annex has links to useful resources offering practical advice on conducting research remotely.

### 1.2 Exemptions from guidance

The Research Ethics Committee recognises that there may be exceptional instances in which this suspension might be waived, in particular as the situation evolves and not all the countries are affected in the same way. **However, for avoidance of doubt, any research involving face-to-face interaction with participants must continue to be on hold until further notice, and unless specifically approved for exemption in writing by the Research Ethics Committee.**

Requests for exemption will be considered only on an exceptional basis.

A researcher seeking an exemption from the Research Ethics Committee is required, in the first instance, to **contact Research Services providing detailed justification** as to why face-to-face data collection should not be suspended or why a new study should be permitted to commence. In the meantime, face-to-face data collection must be on hold until any such exemption is approved.

**It is the responsibility of the researcher to carefully monitor any changes to UK/University and local government guidance and to contact Research Services if in doubt.**

### 1.2.1 Research in the UK - exemptions

Each exemption request will be considered on its individual merits and with attention to the particular risks involved. Possible grounds for considering the granting of a written exemption by the Research Ethics Committee may include:

1. The research is being undertaken on pressing and vital public health grounds<sup>1</sup> or due to other similarly urgent social or legal considerations and cannot be delayed;<sup>2</sup>
2. The researcher has fully evaluated whether the research could be conducted remotely, and if this is impossible and would substantially reduce the value or validity of the research;
3. The circumstances in which the research will be conducted do not breach any restrictions on domestic travel and meetings or gatherings of people issued by local or national authorities;
4. The research will not require the researcher or participants to take part in any additional interactions or enter any new environment that could increase their risk of exposure to COVID-19 or risk inadvertently taking COVID-19 into a place that would be vulnerable to infection.

**Please be aware that the University travel insurance does not cover Covid-19 related incidents. Any researcher who decides to travel either within the UK or outside and whose research is affected by Covid-19, the University will not be able to cover any costs related to such impact.**

### 1.2.2 Research outside the UK - exemptions

The University's current default position is that **face-to-face interactions for research purposes are not permitted**. However, we are aware that each country is progressing through this pandemic at a different rate and that many of our researchers are based outside of the UK or have returned to their home country where local government guidance might be different from that in the UK.

As such, if **ALL** of the following criteria apply, you may be able to begin or recommence face-to-face research on the basis of a written exemption from the Research Ethics Committee:

1. The researcher is already in the country in which they need to do the research ( e.g. they are based there for research or other purposes, arrived there prior to the pandemic and have remained there or it is their home country);
2. They need to conduct research under the same conditions as under 1.2.1, above (Research in the UK – Exemptions); **OR**
3. The HealthTravelPro guidance (used by FCO) does not indicate a high risk of exposure to COVID-19 within this country or in specific areas within it; and
4. The researcher has fully evaluated whether the research could be conducted remotely, but this is impossible or would substantially reduce the value or validity of the research; and

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<sup>1</sup> (i.e. medical research)

<sup>2</sup> This could cover, for instance, investigation into the human rights impact of responses or the social impact of social distancing

5. Their research could be undertaken in full compliance with the local government's current laws, restrictions and guidance for domestic travel, meetings or gatherings of people and social distancing; and
6. The research will not require the researcher or participants to take part in any additional interactions or enter any new environment that could increase their risk of exposure to COVID-19 or risk inadvertently taking COVID-19 into a place that would be vulnerable to infection.

**Please note that meeting these listed criteria does NOT guarantee that an exemption will be granted. Exemptions may be withheld according to the judgment of the ethics committee as well as the prevailing public health guidance.**

**Please be aware that the University travel insurance does not cover Covid-19 related incidents. Any researcher who decides to travel either within the UK or outside and whose research is affected by Covid-19, the University will not be able to cover any costs related to such impact.**

If the above criteria apply, **you should outline your position to Research Services, who will ask the Research Ethics Committee to determine if it is appropriate for you to proceed.** This should include a completed and detailed assessment signed by your director or supervisor, which directly addresses any anticipated risks that may arise due the developing nature of the COVID-19 pandemic.

For avoidance of doubt, the planned research can begin, or recommence, **only** once the Research Ethics Committee has given its approval.

The situation worldwide is evolving quite rapidly, so researchers must be prepared to amend their planned approach if needed. They must therefore show to the Research Ethics Committee that their plan has addressed all eventualities. **Our main concern is that all of our researchers and participants are safe.**

## **2. Stage of research and next steps**

The Research Ethics Committee recognises that researchers across the university find themselves in different situations, depending on the current stage of their research and/or their location. The following advice aims to provide guidance on next steps in relation to those distinct scenarios. Please read the headings carefully as you must follow the advice that applies to your specific situation.

**If your situation is not covered,** then please contact Research Services directly for advice.

2.1. I have not yet begun data collection but have the Research Ethics Committee's approval to do so. I will amend my recruitment plan to recruit and interact remotely.

**Students** should discuss all proposed changes to their project with their supervisor, including any additional issues such as local data protection regulation when shifting to digital research (if outside the UK), before implementing them. There is no need to complete a new ethical assessment form. **But supervisors must approve the new arrangements and Research Services must receive an email with the proposed new arrangements.** The email should include the approval reference number and detail the changes, confirming that the standard issues relating to ethics and data protection

have changed or not. If students decide that they have to suspend their research, the usual interruption procedures will come into play (see section 2.3).

**Staff and fellows should contact Research Services** and include the approval reference number. They should detail the changes and confirm whether the standard issues relating to ethics and data protection have changed or not. This includes any work undertaken by contractors on behalf of UOL researchers.

If the ethical implications and the data protection issues have significantly changed, the proposed plans to mitigate the outlined issues may require further approval from the Research Ethics Committee. The Research Services will coordinate with the researcher as needed.

### 2.2. I have already begun data collection and will now change to remote participant interaction.

The recruitment plan needs to be changed to outline how the researcher will now interact with participants. All participants already recruited into the study must be informed about the change from face-to-face to remote interaction as soon as possible, and must be provided with an updated participant information sheet and consent form. Researchers must make clear that participants remain free to withdraw at any point without giving a reason.

**Students** should discuss all proposed changes to their project with their supervisor, including any additional issues such as local data protection regulation when shifting to digital research (if outside the UK) before implementing them. There is no need to complete a new ethical assessment form. **But supervisors must approve the new arrangements and Research Services must receive an email with the proposed new arrangements.** The email should include the approval reference number and detail the changes, confirming that the standard issues relating to ethics and data protection have changed or not.

**Staff and fellows should contact Research Services** and include the approval reference number. They should detail the changes confirming whether the standard issues relating to ethics and data protection have changed or not. This includes any work undertaken by contractors on behalf of UOL researchers.

If the ethical or data protection implications of the research have changed significantly, the proposed plans to mitigate the outlined issues may require further approval from the Research Ethics Committee. The Research Services will coordinate with the researcher as needed.

<p><b>Note:</b> If you are a researcher with time constraints around conducting your research and cannot conduct remote participant interactions, it is recommended that you change your research to involve secondary data analysis only (i.e. data which has already been collected) so that no primary data collection is required.</p>
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### 2.3. I need to suspend or postpone my research. What do I need to do?

Should it not be possible to modify your research project, or you choose to postpone your research, you must inform any active participants as soon as possible that the research has been

suspended/postponed. You should inform them about why the study has been suspended and about any implication this may have for them; you must describe how any actively enrolled participants will be managed, particularly concerning any safety monitoring/follow-up where applicable.

If data collection has already been completed, there is no immediate need to contact your participants to advise them of a delay/postponement.

Note that where data gathering has been completed but where specific dates for feedback or follow up had been given to participants, you should contact the participants as soon as possible and explain that there is a delay and/or it's possible the research project will not be completed as initially planned.

**You should notify the Research Services if you suspend your research.** Unless significant changes to the research design have been made as a result of the suspension, the pausing of the research study and the issue of an update to participants will not require further ethical approval. But, please note that we will require at **least one-month's notice** if/when you wish to restart your research, for our records and to re-assess whether the ethical and legal implications are still relevant and appropriate.

#### 2.4 I need to need to extend the duration of my research/studies.

a) **Students:** Following consultation with funders and/or supervisors, if students decide that they have to suspend/interrupt their research/studies, the usual interruption procedures will come into play.

- SAS students should complete the relevant form, which can be found [here](#) and submit this to registry at [sas.registry@sas.ac.uk](mailto:sas.registry@sas.ac.uk) This in effect 'stops the clock' on the research and does not count towards the total length of your registration.
- ULIP or UOLWorldwide students should contact their relevant point of contact, as noted at the top of the document.

Funded students should check with their funder before suspending their study.

Students funded through LAHP should note that extensions to periods of registration are possible- check out the current advice here: <https://www.lahp.ac.uk/coronavirus-information-for-lahp-students/>

Students should also consider the effect of extensions on their visa conditions and finances. These may be considerable. Support on these matters is available from the registry.

Further information from UKRI, is available here: [UKRI – Training Grants Specific Guidance](#)

b) **Research Projects:** As a reminder, any changes to the intended scope, milestones delivery and delivery date of any **externally funded research project** must be discussed and agreed with the relevant funder. For further advice, please use links below.

- [UKRI](#)

- [British Academy](#)
- [European Commission](#)
- [EU MSCA](#)
- [European Research Council \(ERC\)](#)
- [Leverhulme Trust](#)
- [Royal Society](#)
- [Wellcome Trust](#)

In addition, any delays, which can only be managed by having an extension or a suspension, will require approval not only from the funding body, but from the Dean/PVC (Research), to ensure all implications, including financial, are fully assessed and approved. The research services are currently reviewing all ongoing grants and will be managing the process. Each grant will be reviewed individually. For any further advice, please contact us at [research@sas.ac.uk](mailto:research@sas.ac.uk)

#### 2.5. I have not yet sent my ethical assessment form and do not yet have ethical approval

Any new ethical assessment will be considered as usual. Guidance is available [here](#).

Please note that due to these unprecedented conditions, there may be a delay in the response time.

For avoidance of doubt, **no** data collection that involves face-to-face interactions with your participants will be approved, until the current guidance has been revised.

### **3. New studies relating directly to COVID-19 response**

An expedited review process will be considered for new research by staff, PhD students or Fellows that relates specifically to COVID-19 and its implications. This process will apply only where research into COVID-19 and its implications is being undertaken on pressing and vital Public Health Grounds (i.e. medical research) or cannot be delayed due to other similarly urgent social or legal considerations.

Please note that we are not expecting any taught postgraduate students to undertake COVID-19 related projects, except where the research is purely desk-based.

It is vital that Research Ethics Committee prioritises studies that are time sensitive and which relate to this crisis. In order to facilitate this, projects that are not time critical will continue through the normal review process timelines. We would ask researchers to be mindful of this when considering the below guidance on expedited review.

The expedited ethical assessment must additionally address the following points in detail:

1. What are the vital Public Health Grounds (i.e. medical research) or other similarly urgent social or legal reasons for the study to be conducted?
2. What is the rationale for the study to be conducted at this time? Why can it not be conducted at a later time?

3. How will research methods comply with the applicable government's guidelines and/or laws on social distancing and travel restrictions?
4. Where such research necessitates methods that do not strictly meet current guidelines or that involve travel or convening any face-to-face meetings, how does the public health, social or legal benefit outweigh any potential risk to the participants or researcher (and what concrete actions that will be taken to mitigate this risk)?
5. Where appropriate, can you provide a detailed assessment of the potential risks to the researcher(s), as well as to others, including participants, and how identified risks, including travel or face-to-face interactions, will be addressed?

#### **4. Regular review and further information**

**This guidance is reviewed regularly.** It remains in effect until further notice.

For any further advice or information, please **contact**:

UOL Research Services [research.ethics@sas.ac.uk](mailto:research.ethics@sas.ac.uk) (default)

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## Please review the appendix for guidance on undertaking Remote, Digital and Online Research

**Further advice including external sources offering practical guidance on remote research is also noted below**

### *1. Remote research tips*

Researchers are advised to consider carefully how best to proceed with their research, on a case by case basis, and where possible, make changes to the research design such that it can be conducted online, rather than face-to-face.

You should adjust methods, timings and/or responsibilities to enable progress to be maintained.

Ethical issues include, but are not limited to:

- Securing meaningful consent through remote means (including explicit consent for making and storing any recording of an interview conducted by phone or VOIP or any other digital files);
- Guaranteeing the security and privacy of remote participant/s during the interview and their compliance with applicable local guidelines or laws related to COVID-19;
- Ensuring the platform or end-to-end encrypted VoIP application used for interviews or data collection supports the security and confidentiality of participants and their data during and after interviews are conducted; and
- Guaranteeing that data is securely stored after interviews and is deleted as soon as possible from any third-party applications used in data collection.
- Risks around all these issues are heightened when conducting remote research on sensitive topics, in areas of insecurity or with participants who are in any way vulnerable, and researchers planning to conduct such work should reflect upon whether they are able to fully mitigate these risks.

The UK data service offers guidance on **online data collection**:

<https://www.ukdataservice.ac.uk/teaching-resources/non-interview/online-data-collection.aspx>

This article explains end-to-end encryption and profiles five **end-to-end encrypted VoIP applications** that may be **suitable for remote interviews**

<https://www.geckoandfly.com/23884/secure-phone-calls-encryption/>

This article talks about using **Skype to collect data**:

[https://warwick.ac.uk/fac/soc/al/people/mann/interviews/paul\\_symonds\\_-\\_skype-research-method.pdf](https://warwick.ac.uk/fac/soc/al/people/mann/interviews/paul_symonds_-_skype-research-method.pdf)

Here are links to guidance on **conducting telephone interviews**

- <http://www.qualitative-research.net/index.php/fqs/article/view/959/2094>

- [Phone Interviewing as a Means of Data Collection: Lessons Learned and Practical Recommendations | Burke | Forum Qualitative Sozialforschung / Forum: Qualitative Social Research](#)
- <http://eprints.ncrm.ac.uk/1576/1/14-toolkit-phone-interviews.pdf>

This resource addresses **fieldwork during the pandemic**:

<https://docs.google.com/document/d/1clGjGABB2h2qbduTgfqribHmog9B6P0NvMgVuiHZCl8/mobilebasic>

## 2. *Guidance on securing online data collection*

There are a number of different options available to effectively support research being conducted online. When choosing the most suitable option, you should think about which option may suit your methods best, but most importantly, online data collection must always be secure. As such, our guidance on data collection and management applies. You can review it online [here](#)

In summary, for any project undertaken under the University's auspices, the following considerations must be taken into account:

1. is there a data management plan, which clearly sets out what data will be collected, who will access it, how it will be managed during and after the project?
2. if personal data is involved and data protection law is therefore engaged, are we ensuring we are mitigating risk and ensuring compliance (e.g. compliant consent forms for participants, agreements with partners and third parties, secure forms of collection and storage)?

It is particularly relevant when using particular technologies to collect data. The latest guidance from the Information Commissioner's Office in light of C-19 is summarised here <https://ico.org.uk/about-the-ico/news-and-events/news-and-blogs/2020/04/combating-covid-19-through-data-some-considerations-for-privacy/>. While primarily about contact tracing apps, the headline questions mirror many of UOL standard approaches around research data management:

- *Have you demonstrated how privacy is built in to the processor technology?*
- *Is the planned collection and use of personal data necessary and proportionate?*
- *What control do users have over their data?*
- *How much data needs to be gathered and processed centrally?*
- *When in operation, what are the governance and accountability processes in your organisation for ongoing monitoring and evaluation of data processing – to ensure it remains necessary and effective, and to ensure that the safeguards in place are still suitable?*
- *What happens when the processing is no longer necessary?*

The need for swift action on COVID-19 related studies that include personal data needs to be balanced against the risks around collecting and storing / analysing data about health. This is 'special category data' under the EU GDPR and the UK Data Protection Act 2018 and naturally carries a high level of compliance and reputation risk if subject to unauthorised access, misuse or loss.

The COVID-19 studies data will very likely have a long term value and scope for re-use in subsequent research. Therefore due diligence is essential to 'future proof' them for the period beyond the current emergency.