

University of Cambridge Policy on the Ethical Conduct of Research Involving Human Participants or Personal Data

1. Policy Statement

1.1 The University of Cambridge is committed to fostering a research environment where research is conducted to high ethical standards and in which research is able, within the law, to express new ideas and explore controversial or unpopular topics and opinions.

1.2 This policy serves as a guiding framework for the ethical conduct of research involving human participants, human material or personal data as the subject of research.

1.3 The policy is established with the following objectives:

- a) To foster a culture of ethical research in a way that safeguards the dignity, rights, health, safety, freedom of expression, and privacy of all individuals involved in research conducted under the University's purview.
- b) To maintain an ethical review process that enables research projects to be subject to a level of scrutiny in proportion to the ethical risk.
- c) To define the roles and responsibilities of individuals, teams and committees, ensuring clarity and accountability in the implementation of this policy.
- d) To set out the guiding principles that underpin research involving human participants, human material and personal data as the subject of the research.
- e) To provide clear and easily accessible guidance and support on best ethical practice in order to help researchers to understand and act according to expected ethical, legal, regulatory and professional frameworks, obligations, and standards (where applicable).
- f) To facilitate ongoing monitoring, review, and enhancement of ethical standards, policies and practices of Department, Faculty, School or equivalent-level Ethics Committees.

1.4 For avoidance of doubt, this Policy will uphold the University's commitment to academic freedom set out in [University Code of Practice of Freedom of Speech](#) and aims to support individuals' consideration of ethical issues and risks arising from their research involving human participants, their tissue or personal data as the subject of research and to manage such risks appropriately.

1.5 This policy should be read in conjunction with the University's [Good Research Practice Guidelines](#) and [Research Integrity Statement](#).

1.6 The University is committed to the ethical conduct of research and the wellbeing of all individuals involved in research activities, including participants, researchers and third parties.

2. Scope/Application of the Policy

2.1 This policy will apply to all members of staff and students at the University (all referred to hereafter as 'Researcher' or 'Researchers') involved in:

- a) Research within the course of their employment and/or studies at the University of Cambridge;
- b) University-led research studies, whether or not the research is conducted on the University's premises or using the University's facilities;
- c) Research studies involving the University that are led by other institutions, except where there is a collaboration agreement in place that requires researchers to adhere to the lead institution's policies and these policies are sufficiently robust to meet the University's standards and expectations.

2.2 The policy will also apply to other persons engaged in a University-led research project who, as a condition of being granted access to University facilities or premises, have agreed in writing that this policy will apply to them.

2.3 This Policy does not apply to staff engaged for employment under Statute J 6 when undertaking research in the service of the Press and Assessment Department.

3. Guiding Principles

3.1 The University recognises that ethical issues raised by research and the understanding of research ethics varies considerably across disciplines and that Schools will necessarily have differing approaches to ethical review and the framing of ethical guidance. Given this, subject specific guidance should be obtained by researchers from their Department, Faculty or School.

3.2 Set out below are the broad principles that the University generally expects its researchers to abide by. These principles should be interpreted in line with department guidance.

- a) **Minimising Harm:** Researchers must minimise the risk of unwarranted harm to participants, ensuring they are informed in advance about any significant potential risks. Where disclosure (e.g. of criminal activity or public corruption) may result in significant harm to the participant but is considered warranted, researchers should seek appropriate advice before acting.
- b) **Burden Reduction:** Non-harmful burdens to participants should be minimised. If a less burdensome means of conducting research is not possible, participants must be informed about any burdens involved in the research.
- c) **Informed Consent:** Informed consent should normally be obtained from participants at an appropriate point in the research process and appropriately documented¹. If informed consent cannot be obtained from participants, the research must undergo an appropriate ethical review process.
- d) **Participant withdrawal:** Researchers must respect participants' right to withdraw from active participation in research.
- e) **Confidentiality and Anonymity:** Confidentiality of information given by participants and the anonymity of participants must be respected at all times, except where participants have agreed otherwise, or where disclosure is required or permitted by law
- f) **Data Protection:** Researchers should make proportionate and appropriate² efforts to ensure effective protection of stored data that is private and confidential including, where appropriate, efforts to pseudoanonymise stored research data.
- g) **Protection of Vulnerable Individuals:** Special protection measures³ must be in place for participants who are under 18, who are vulnerable individuals, or those lacking capacity or opportunity to consent.
- h) **Academic Integrity:** Research must be designed and undertaken in a way that maintains academic independence, integrity, and quality.
- i) **Transparency:** Where ethical review is required, the presentation of research methods should be open and clear. Significant risks identified during research should be promptly communicated, and advice should be sought as necessary.
- j) **Legal Compliance:** Research must be carried out consistently with all relevant principles outlined in current UK law. University sponsored research carried out overseas should adhere to local expectations, practices and legal principles, without compromising University standards and UK law.

¹ The process of obtaining informed consent should be documented in a way that aligns with the nature of the research. For example, in health research, the process of obtaining informed consent should be documented in a research protocol outlining the participant consent forms and consent procedures. In anthropology, consent may be documented through recorded interviews or field notes.

² The School of Clinical Medicine has adopted its own [Information Governance Policy](#) which is applicable to researchers in that School.

³ Researchers must adhere to the University's [Children and Vulnerable Adults Safeguarding Policy](#) and the Mental Capacity Act. In cases where a vulnerable participant over the age of 18 lacks the capacity to consent, researchers must seek review from the Health Research Authority (HRA).

3.3 These guiding principles underpin the ethical framework of research involving human participants, human material and personal data as the subject of research at the University of Cambridge, promoting a culture of integrity, respect, and responsibility in all research endeavours.

3.4 Notwithstanding the guiding principles above, the University recognises that researchers may have good reasons to deviate from these principles, particularly in specific instances in which certain principles may conflict with each other⁴. In such cases, researchers must seek advice and ethical review as appropriate.

4. Ethical Review Process

4.1. The University is committed to providing a thorough ethical review process that is proportionate to the potential risk involved in research activities and based on ethical risk considerations.

4.2 The University recognises that there are many cases where independent ethical review from a University Research Ethics Committee (REC) will not be necessary. In particular, documentary research on sources that are in the public domain, such as historical, literary and theoretical research, will not normally require independent ethical review. However, it expects all researchers embarking on research involving human participants, human material or personal data as the subject of research to consider the ethical risks of their work and, where necessary, seek further advice (as detailed in section 5).

4.3 Research projects identified as raising more than minimal ethical risk⁵ must undergo ethical review prior to research work commencing unless a specific local exemption applies.

4.4 In such instances, the ethical review must be independent of the research team and conducted in a manner that maintains objectivity and avoids bias and prevents conflicts of interest in the review process.

4.5 Where local review is not available or insufficient, review should be sought at School level. As necessary, projects must be referred to external bodies, such as the Health Research Authority (HRA), the Ministry of Defence, or a relevant overseas REC, for further ethical review.

4.6 All applicants intending to carry out research using human bodies, organs and/or relevant material and identifying information derived from it, must ensure consent and storage in line with the Human Tissue Act (2004) , (see [Code E: Research'](#) for further details).

4.7 All applicants intending to carry out research involving animals should refer to the University [Animal Welfare policy](#).

⁴ For example, guiding principles 3.2a) and 3.2b) require researchers to seek informed consent and inform participants about non-harmful burdens involved if a less burdensome means of conducting research is not possible. If the research study requires deception, obtaining informed consent, informing participants of the burdens may compromise the academic integrity of the work as required by 3.2h). In such instances, researchers should normally seek independent ethical review.

⁵ The following illustrative examples are provided to highlight research that raises minimal ethical risk.

Example 1: A research study proposing to interview and publicly criticise politicians about their policies is likely to be judged as of minimal ethical risk since politicians might encounter public criticism on a regular basis. However, if the research proposed to publicly expose a member of the public to similar scrutiny in a way that they would not normally encounter then this would not normally be considered minimal ethical risk.

Example 2: A student research project proposing to interview individuals about their careers might be considered minimal ethical risk as these would be the sorts of questions they might encounter in everyday life, but if the interview also included questions pertaining to their sexuality or political beliefs the project would not normally be considered minimal ethical risk. (Please note that if participants are recruited from the NHS, the project will require HRA approval even if it is minimal risk).

Conducting ethical review

4.8 Ethical review should be reasonable and proportionate to any perceived ethical risk.

4.9 Whilst the exact ethical review framework (and terminology) differs across RECs, as set out in the UREC [guidance note on ethical review procedures](#), there are:

- a) three main ethical review approaches that RECs may use:
 - i. 'Light-touch' review (e.g., expedited review by chair's action),
 - ii. A standard REC-approved research procedure,
 - iii. Full Committee review.
- b) There are five kinds of decisions that can be made:
 - i. Favourable opinion (ethical approval),
 - ii. Conditional/provisional favourable opinion/approval (requires conditions to be satisfied prior to commencement of the research, which may include resubmission of changes to the committee for verification),
 - iii. Unfavourable opinion (proposal rejected),
 - iv. Referral of the case for further review,
 - v. Withdrawal of the case (e.g., at the request of the applicant).

4.10 Where the need to seek independent ethical review is identified, a researcher should not start any research activities (e.g., gathering data, recruiting participants, conducting research procedures involving human participants and/or new analysis of personal data as the subject of research) until they have received a favourable ethical opinion/ethical approval.

4.11 Where local Research RECs consider that they are unable to provide the level of necessary review expected, the Committee should refer the case to the relevant School-level REC for review.

4.12 Where circumstances make it impossible for a School-level REC to review a project, typically when the project is beyond the expertise of the Committee members, this case should normally be referred immediately to the Secretary of the University Research Ethics Committee.

4.13 The University Research Ethics Committee expects such occurrences to be rare and will expect that School-level Committees, in their constitution and procedures, should meet the standards necessary to enable them to provide ethical opinion for all forms of research in their field.

4.14 Serious cases of a failure to apply for ethical review where required or the breach of the approved terms of a project may be addressed through the University's established misconduct procedures.

Appeals and Complaints

4.15 Researchers may appeal decisions made by a University REC on specific grounds, including procedural irregularities or bias, following the procedures outlined in [the Appeals Procedure](#) (Appendix I). Dissatisfaction with the decision of a University REC alone is not sufficient grounds for appeal.

4.16 Additionally, individuals can express concerns or complaints about research ethics directly to UREC, which will address cases through the University's [Misconduct Procedures](#) when appropriate.

4.17 The Committee welcomes approaches from whistleblowers with information concerning research ethics at the University. Staff are protected under the University ['Whistleblowing' Policy](#).

5. Key Roles and Responsibilities

5.1 Everyone involved in conducting or supporting research involving human participants, human material or personal data, is expected to uphold high ethical standards and, where possible, to promote ethical research in line with the guiding principles set out in section 3 of this Policy.

5.2 In addition, individual researchers, teams and committees may have additional roles and responsibilities in supporting and/or ensuring the ethical conduct of research involving human participation, human material or personal data as the subject of research as set out below.

5.3 **Individual Researchers** (including research supervisors) are ultimately responsible for ensuring that their research is conducted to the appropriate and high ethical standards. This includes taking personal responsibility for:

- a) familiarising themselves with this policy, as well as other related University policies and online guidance (see Appendix II), where relevant to their work, and any subject specific material including for example:
 - i. policies, procedures and guidance from:
 - relevant professional bodies,
 - their research funder,
 - national and international regulatory bodies, such as the HRA;
 - ii. research ethics frameworks issued in appropriate areas;
- b) identifying ethical risks raised by their work, giving particular attention to the matters in section 3 and consulting, where necessary, with their Supervisor, Faculty and/or Departmental policies and/or the Departmental/Faculty staff member identified as responsible for research ethics;
- c) ensuring that any research identified as requiring ethical review does not commence until a favourable review has been obtained from an appropriate REC;
- d) submitting an application for ethical review to the appropriate REC (where required) in a timely manner prior to the commencement of the research, ensuring that all information provided within the application is complete and accurate;
- e) ensuring ongoing, active and appropriate consideration of the ethical issues of a research project, including ensuring that all research activity being conducted is within the scope of the favourable ethical opinion obtained (where required) or amending project documents and seeking ethical review of such amendments (where necessary);
- f) designing, conducting, and reporting research in ways that embed ethical practice throughout;
- g) adhering to local expectations, practices and legal principles without compromising University standards or UK laws when conducting University sponsored research overseas.

5.4 **Supervisors of students/lead researchers** (as appropriate) are responsible for:

- a) ensuring that students and research staff under their supervision become familiar with this policy and accompanying online guidance;
- b) facilitating necessary training and guidance relating to ethical conduct of research;
- c) ensuring that, where appropriate, ethical review is sought prior to the research commencing;
- d) providing advice to students under their supervision who seek their guidance on ethical review requirements, consulting, where necessary, with Faculty and/or Departmental policies, REC and/or the staff member identified as responsible for research ethics;
- e) supporting students and relevant research staff to design, conduct, and report research in ways that embed ethical practice throughout the research study.

5.5 **Institutions/Heads of Institutions** (or their designated ethics contact point) are responsible for:

- a) ensuring that staff, student, visitors and other researchers with privileged access to use institutional premises or research facilities are made aware of this Policy as necessary;
- b) ensuring the effective implementation of the Policy's standards and support of the ethical review process within their institution. This might include one of the following approaches:

- i. providing initial guidance and clarification on Policy-related inquiries within their respective academic units to facilitate the referral of cases to School-level RECs for ethical review,
- ii. making arrangements (e.g., a referral procedure or contact point to handle ethics queries and referrals) to facilitate the referral of cases to School-level RECs for ethical review,
- iii. establishing a local REC (or equivalent) and procedures to handle ethical review of research involving human participants or personal data if the Head of Institution believes a local REC would be useful.

5.6 University RECs (whether local or School-level) are responsible for:

- a) overseeing the ethical review of specific research projects involving human participants, human material (where appropriate) and personal data;
- b) ensuring that proposals referred to them receive valid, sufficiently comprehensive, timely, independent ethical review in accordance with the REC remit and review procedures;
- c) referring projects that are beyond their expertise to a more appropriate ethical review group to ensure comprehensive and expert evaluations;
- d) providing applicants with an ethical opinion on the research;
- e) establishing and managing its procedures for the ethical review of research;
- f) advising, where appropriate, on the wider ethical issues raised by research projects and their potential outcomes (for example dissemination, data use and archiving);
- g) reporting annually to the UREC.

5.7 The University Research Ethics Committee (UREC) is responsible for:

- a) overseeing the implementation of this policy;
- b) monitoring the ethical review system through receipt of annual reports from all University RECs to ensure a consistency of standard and approach;
- c) maintaining an oversight of the policies and practices of Department, Faculty, School or equivalent-level RECs and taking appropriate action where there is evidence that the University's Policy is not being followed;
- d) in exceptional cases, considering and giving guidance on specific cases or other matters referred to it by University RECs or appeals against a decision of RECs;
- e) offering support and training to staff and students and any others engaged in University research projects to maintain awareness and high ethical standards;
- f) reporting to the General Board annually and recommending any changes that are considered necessary in the light of experience.

5.8 The University is responsible for:

- a) fostering a research culture that embraces the principles set out in this Policy as well as all obligations set out in relevant legislation governing the protection of the dignity, rights, safety, freedom of expression and privacy of those involved in research;
- b) providing clear and easily accessible guidance on best ethical practice and regulatory requirements;
- c) maintaining an ethical review process that enables research projects to be subject to a level of scrutiny in proportion to the ethical risk;
- d) providing a mechanism for applying for research ethics review that is user-friendly, fit for purpose, proportionate to the risks involved, and facilitates the review process;
- e) offering support and training to staff and students and any others engaged in University research projects to maintain awareness and high ethical standards;
- f) supporting researchers to understand and act according to expected ethical, legal, regulatory and professional frameworks, obligations, and standards.

6. Related Policies and Further Guidance

6.1 Aspects of this policy relating to areas covered by other University policies, statements, procedures, or guidance are listed in Appendix II.

6.2 Each Department, Faculty, or School may have specific guidelines related to ethical research practices and/or a local research ethics committee⁶.

6.3 The University Research Ethics Committee has overall responsibility for the implementation of this Policy. For specific queries related to policy interpretation, University ethical review processes, or concerns about policy implementation, individuals can contact UREC directly through the UREC Secretary (Policy Owner).

7. Review

7.1 As part of the University's commitment to ethical research, this policy will be reviewed every 3 years, or more frequently in the event of a major policy change by a significant stakeholder or the identification of a significant weakness in the policy as it stands.

Effective date of this Policy: 12 February 2026

Date of next review: 12 February 2029

⁶ The list of the University RECs: <https://www.research-services.admin.cam.ac.uk/manage-risk/research-ethics/find-research-ethics-committee>

Appendix I: Appeals Procedure

UNIVERSITY RESEARCH ETHICS COMMITTEE

University of Cambridge Research Ethics Review Appeals Procedure

A. Background

- i. The University is committed to advancing high quality academic research and ensuring that any research activities which involve human participation or personal data are undertaken in such a way that the dignity, rights, health, safety, and privacy of those involved are safeguarded. As part of this commitment, the University has established a procedure to allow appeal against the decisions of local and School-level Ethics Committees.
- ii. This procedure applies to all University staff and students engaged in a research project to which the University's Policy on the Ethical Conduct of Research Involving Human Participants and Personal Data applies, and to other persons engaged in a University-led research project who, as a condition of being granted access to University facilities or premises, have agreed in writing that the policy will apply to them.
- iii. A researcher may appeal the decision of any local and/or School-level Research Ethics Committee on any of the following grounds:
 - a) That there existed material circumstances relating directly to the case of which the reviewing committee was not aware;
 - b) That procedural irregularities occurred in the review process, which were of such a nature as to cause reasonable doubt as to whether the Committee would have reached the same conclusion had the irregularities not occurred; and
 - c) That there is demonstrable evidence of prejudice, bias, or inadequate review.
- iv. If the University Research Ethics Committee are of the view that a complaint does not fall within any of the grounds specified above, they shall dismiss the complaint and shall inform the complainant accordingly. Dissatisfaction with the decision of a local or School-level Research Ethics Committee alone is not sufficient grounds for appeal.

B. Appeal procedure

- i. If a researcher wishes to appeal the decision of a Research Ethics Committee, he or she should notify the Secretary of the University Research Ethics Committee within ten working days of being notified of that decision. The appeal should be sent to the address given on the University's Research and Research Ethics websites. If significant new information concerning the project comes to light after

this date, the researcher should approach the initial reviewing REC in the first instance.

- ii. An appeal should be submitted in writing and must include:
 - The title of the research proposal, and name of the supervisor, if appropriate
 - The name of the Research Ethics Committee to which it was submitted and the date of the decision to be appealed
 - The reason for the appeal
 - Any documentary evidence to support the appeal.
- iii. The University Research Ethics Committee Chairman will decide on a case by case basis whether the appeal will be dealt with electronically or in person.
- iv. The Committee will co-opt experts if deemed necessary.
- v. The Secretary shall obtain all relevant information from the Secretary of the Committee(s) that made the initial decision and circulate it to all University Research Ethics Committee members. The researcher and the Committee(s) that made the initial decision will also be required to provide any additional information relevant to the case for consideration by the University Research Ethics Committee. Up to fifteen working days from receipt of the appeal will be allowed for the gathering of this information.
- vi. The Secretary shall ensure that any institutional obligations and/or relevant contractual obligations to research funding bodies and partner institutions are met, which may include notifying them of the appeal and its outcome.
- vii. In any case that involves allegations of misconduct, in accordance with the University's established procedures, the Secretary shall ensure that the Academic Secretary is fully aware of the appeal.
- viii. The University Research Ethics Committee will deal with requests for appeal with all reasonable expedition. The Secretary shall set a deadline for the completion of the appeal process and, where appropriate, provide a date for the Appeal hearing, and inform the appellant accordingly.
- ix. Both the researcher and the secretary of the Research Ethics Committee involved will be notified of the result in writing.
- x. Those making an appeal to the University Research Ethics Committee are protected by University policies on victimisation and harassment:
<http://www.admin.cam.ac.uk/offices/hr/policy/dignity/procedure.html> .

Appendix II: List of Related Policies and Guidelines

Area	Relevant University Polices, statements, guidance and procedures	Regulations & Funder Requirements
Animal research	Use of animal in research Policy Overseeing animal research guidance.	Animals (Scientific Procedures) Act 1986 ASPA
Clinical Research	Clinical School research governance Sharepoint <ul style="list-style-type: none"> • Clinical School IG Policy 	UK Policy Framework for Health and Social Care Research Regulatory approval bodies include: <ul style="list-style-type: none"> • Human Tissue Authority • Human Fertilisation and Embryology Authority • Gene Therapy Advisory Committee. • Medicine Healthcare Regulatory Authority
Conflicts of Interest	<ul style="list-style-type: none"> • Conflict of Interest Policy 	
Concerns regarding ethical review	<ul style="list-style-type: none"> • Research Ethics Review Appeals Procedure • Misconduct in Research Policy • Whistleblowing Policy. 	
Good Research conduct	<ul style="list-style-type: none"> • Good Research Practice Guidelines • Research Integrity Statement. 	
Human Tissue	<ul style="list-style-type: none"> • Guidance on Safety Office website • Guidance on Clinical School website 	The Human Tissue Act
Overseas research	<ul style="list-style-type: none"> • University guidance on ethical review of overseas research • Clinical School international health research guidance 	
Personal Data	<ul style="list-style-type: none"> • Guidance on Academic Research Involving Personal Data • Information Compliance data protection guidance (research) • Data Protection Policy • Clinical School IG Policy 	UK General Data Protection Regulation The Data Protection Act 2018
Research data management	<ul style="list-style-type: none"> • Research Data Management website • Information Compliance guidance on records management • Good Research Practice Guidelines 	Funder Research Data policies
Research Ethics Guidance	<ul style="list-style-type: none"> • REC Member handbook • University Research Ethics Webpage 	Refer to funder list on the research ethics website
Vulnerable groups	<ul style="list-style-type: none"> • Children and Vulnerable Adults Safeguarding Policy 	The Mental Capacity Act