

HERTIE SCHOOL RESEARCH ETHICS REVIEW POLICY

PREAMBLE AND STATEMENT OF PRINCIPLES

This policy sets the rules for research ethics reviews at the Hertie School. This is the standard ethics review and approval process for all research projects. It is mandatory for all projects involving human subjects and open to all members of the Hertie School, including faculty members, researchers, academic and administrative staff, and enrolled students. For the purposes of this policy, a “research project” can be any activity that involves (1) collecting new data; (2) acquiring and using secondary data, or (3) activities that intervene in social processes for research purposes without necessarily collecting data.

The policy includes two main sections: Research Ethics Review Mechanism and Procedures, detailing the different levels of ethics review and the respective processes, and Research Ethics Committee, setting out the membership and operational aspects of the Research Ethics Committee.

The research ethics review involves three stages: **self-assessment, review by the Research Ethics Officer, and a full review by the Research Ethics Committee**. It is incumbent on the researcher to know which level of review is demanded by relevant funding bodies, partners, journals, and publishers.

The Hertie School Research Ethics Policy reflects the school’s commitment to academic freedom and research excellence. Sound ethical standards are imperative for excellent research. The procedures set out in this policy are intended to facilitate research and to promote conscientious reflection of ethical issues and implications in research. Each researcher is responsible for complying with the Hertie School’s Code of Conduct, which integrates and makes binding good ethics research principles and conduct in compliance with the German Research Foundations (Deutsche Forschungsgemeinschaft) Guidelines for Safeguarding Good Scientific Practice, national and international legislation and any other relevant regulation, principles and practices.

I. RESEARCH ETHICS REVIEW MECHANISM AND PROCEDURES

1. SELF-ASSESSMENT

- a. **Self-assessment** is a checklist to be completed for every new project and funding proposal that includes research with human subjects and/or identifiable human subject data, or when required by a funder, publisher, or other third party. The self-assessment checklist also addresses data management questions.
- b. **The outcome of the self-assessment** determines the further steps required, if any. It serves as a record that the researcher has reflected on the potential ethical implications of their research and the risk of harm to participants. The self-assessment results in one of the three options:
 - i. eligible for self-certification;
 - ii. review by the Research Ethics Officer;
 - iii. full review by the Research Ethics Committee.
- c. If **eligible for self-certification**, the project is considered exempt from any further review.

2. REVIEW BY THE RESEARCH ETHICS OFFICER

- a. When considered sufficient either for funding bodies, partners, or for publications, or when the project confirms with a **clearly defined set of criteria**, the Research Ethics Officer can conduct the review.

- b. If submitted for a review by the Research Ethics Officer, the officer evaluates the application, and submits and signs an evaluation report and/or issues a recommendation.
- c. The Research Ethics Officer may consult the legal advisor of the Hertie School should the application involve issues related to data protection and data privacy, as well as to compliance with the EU's General Data Protection Regulation (GDPR). Whenever deemed necessary, the legal advisor may consult the external Data Protection Officer to provide further advice on such issues.
- d. The Research Ethics Officer may consult one or more members of the Research Ethics Committee, should any questions arise on the review process or substantive questions in the application.
- e. The Research Ethics Officer may recommend submitting the project for a full review, if needed.
- f. In case a publisher/journal requires a formal ethics statement for a project that started prior to the implementation of this policy, the Research Ethics Officer may conduct a special retrospective review through the self-assessment checklist, analysis of supplementary documents, and correspondence with the researcher. If no ethical concerns are raised, the Research Ethics Officer may grant the project a special "Research Ethics Assessment Letter." If, upon retrospective review, complex ethical concerns are raised, the Research Ethics Officer shall forward the case to the Research Ethics Committee for a full review.
- g. All researchers applying for grants and/or third-party funding for research projects must complete the self-assessment checklist. Upon review of the self-assessment, the Research Ethics Officer may provide guidance or feedback to the researchers, if deemed necessary. No formal ethics statement will be provided, unless explicitly requested by the funding body for the application package. If the project receives funding, the researcher must restart the ethics review process and complete the self-assessment checklist once again (after the research design is clear but prior to any data collection).
- h. In case of funding applications, which require the inclusion of an ethics approval statement with the proposal, a "Preliminary Research Ethics Assessment" may be granted. This document must include a disclaimer about the necessity of a new ethics review procedure if the project is funded, prior to its data collection phase. If the funding proposal raises complex ethical concerns, the Research Ethics Officer may forward the proposal to the Research Ethics Committee for a full review.

3. FULL REVIEW BY THE RESEARCH ETHICS COMMITTEE

- a. Where the extent, complexity, subject matter, methodology or data ethics of the project requires a full research ethics review, or where the funder, partner, or publisher requires a formal ethics review or statement, the Research Ethics Committee will review the application.
- b. Examples of projects that require full review include but are not limited to projects involving vulnerable participants, where the researcher is unable to gain full and informed consent from the participants, covert research, use of deception, manipulations of social processes, the inclusion of methods or topics which may lead to risk or harm to participants, and selected cases of processing of sensitive or special category of data.¹
- c. The Research Ethics Committee identifies ethical issues and risks within research projects, provides advice on how to resolve these issues and risks without compromising academic freedom as set out in Art. 5 III Grundgesetz, and decides whether the research should be allowed, with a view of protecting research participants.
- d. Meetings are to follow a previously scheduled agenda, amended where appropriate.

¹ See the Research Data Management policy.

- e. Meetings are to be minuted. There is to be an approval procedure for the minutes.
- f. The Research Ethics Committee will determine, by consensus, the application
 - i. approved;
 - ii. conditionally approved: require modifications to secure approval; or
 - iii. not approved.
- g. A quorum of five is required for the Research Ethics Committee's decisions to be binding.
- h. When a consensus appears unlikely, the chairperson calls for a vote with a simple majority required for decision.
- i. A decision of the Research Ethics Committee is to be communicated in writing to the applicant within two weeks of the meeting at which the decision took place.
- j. In cases of conditional decisions, the Research Ethics Committee is to specify the requirements for the implementation of the decision that will secure approval.
- k. In cases where a decision is taken without the full consent of all members of the Research Ethics Committee, dissenting members have an opportunity to append an opinion to the Research Ethics Committee's decision.
- l. A negative decision on an application is to be supported by clearly defined reasons.
- m. Applicants can appeal the decision of the Research Ethics Committee if relevant new or different information can be provided by the applicant, or if the applicant can show that the Research Ethics Committee misunderstood or misinterpreted their application. The appeals should be addressed to Dean of Research and Faculty, who then determines if the appeal should be heard by the Research Ethics Committee, in which the Dean of Research and Faculty would be present as a non-voting ex officio member.
- n. The Research Ethics Committee may decide to reverse its positive decision if information emerges that adversely affects the benefits/risks ratio, for reasons of ethical misconduct, or other violation of established principles of good research practice.
- o. For minor changes in approved research projects, a request for modification must be submitted to the Research Ethics Officer, who will consult the Research Ethics Committee, whenever needed, for an approval of the modification. If the modification fundamentally affects the object and purpose of the project, the method of data collection or the type of data collected, a new application for review may be necessary.
- p. Ethical approval will normally be required before the commencement of research activities, or otherwise at a particular point in the development of the project. Retrospective submissions are discouraged.
- q. A complete exemption of a full review by the Research Ethics Committee may be granted to a project conducted in cooperation with other institutions as long as the Research Ethics Officer receives an official approval statement granted by the other institution's Research Ethics Committee, Institutional Review Board or similar body. This body must have performed a full review of the project and must belong to the home institution of one of the co-authors of the project. In this case, no exemption statement will be granted by the Hertie School's Research Ethics Officer, unless explicitly required by a funder or other relevant institution.
- r. The Research Ethics Officer shall keep records of all issues, applications, statements and reports submitted to the Research Ethics Committee. All decisions, recommendations and correspondence with applicants must be filed in a safe and orderly manner at a place that no unauthorized person shall have access to.

4. REQUIRED DOCUMENTATION

- a. All documentation required for a thorough and complete research ethics review by the Research Ethics Officer or by the Research Ethics Committee, is to be submitted by the applicant. This includes, but is not limited to:
 - i. online application form
 - ii. participant consent form, where applicable
 - iii. project information sheet
 - iv. questionnaire, interview protocol, list of topics to be addressed in surveys, interviews, focus groups and similar events, where applicable
 - v. any previous application to and/or approval of any Research Ethics Committee
 - vi. any other supporting materials.

5. RESEARCH ETHICS REVIEW IDENTIFICATION NUMBER

- a. For any application approved either by the Research Ethics Officer by the Research Ethics Committee, a research ethics review identification number will be issued.
- b. If a research ethics review identification number is needed for a project that is eligible for self-certification, the applicant(s) must submit the self-assessment checklist and any supporting documents to the Research Ethics Officer, who can issue the review identification number upon reviewing the application.

6. SPECIAL PROVISIONS FOR MASTER'S STUDENTS

- a. Guidelines for master's students shall include a paragraph/ bullet points on the most relevant research ethics principles and considerations, and a reference to this policy.
- b. A dedicated Moodle site includes resources intended for master's students.
- c. A special version of the self-assessment checklist is made available for all master's students at the beginning of their master's thesis colloquium. All master's students must fill in the checklist and discuss any issues with their supervisor as an exercise. This checklist includes a research ethics declaration. If a master's thesis project raises complex ethical issues (see e.g. I.4(b)), the supervisor shall advise the student to consult the Research Ethics Officer for further guidance. Supervisors can engage in consultation with the Research Ethics Committee if they believe that a master's thesis should undergo a full review by the Research Ethics Committee.

II. RESEARCH ETHICS COMMITTEE

1. Meetings of the Research Ethics Committee

- a. The Research Ethics Committee shall meet periodically during the academic year as demand necessitates.

2. Appointment and Qualification of the Research Ethics Committee

- a. Upon proposal by the Dean of Research and Faculty, the President nominates the members of the Research Ethics Committee annually. A list of Research Ethics Committee members is approved by the Academic Senate of the Hertie School.

- b. The members of the Research Ethics Committee must have the aptitude, professional competence and qualification necessary for fulfilling their functions. Their responsibilities must be carried out in an impartial manner.
- c. The Research Ethics Committee shall include the following members:
 - i. At least three Hertie School faculty members.
 - ii. One postdoctoral or PhD researcher.
 - iii. A member with expertise and knowledge in research data management and protection. This can be a staff or faculty member, Open Access Officer, Research Data Management Officer, or Data Protection Officer.
 - iv. The Research Ethics Officer.
- d. The Research Ethics Committee will select a chair from among its members, who must be a tenured faculty member.
- e. At least two of the six members of the Research Ethics Committee shall be women. The membership of the Research Ethics Committee shall reflect the disciplinary and methodological expertise and diversity of the Hertie School.
- f. If a regular member cannot participate in the meeting of the Research Ethics Committee, the Dean of Research and Faculty can serve as a substitute.
- g. Whenever the Research Ethics Committee deems it appropriate or necessary, it may consult internal or external expert(s).
- h. Whenever the Research Ethics Committee deems it appropriate or necessary to include a broader view on diversity, equity and inclusion, it may request the Diversity and Inclusion Officer or an external expert to provide a statement on these aspects to inform its evaluation.

The decisions of the Research Ethics Committee must adhere to the effective laws, ethical principles, and good research practices.

3. Withdrawal, Dismissal and Conflict of Interest of the Research Ethics Committee Members

- a. A member of the Research Ethics Committee must voluntarily withdraw from the decision procedure concerning an application where there arises a conflict of interest or they are involved in the project and/or application process.
- b. The members of the Research Ethics Committee can be dismissed by the Dean of Research and Faculty if they intentionally or negligently omit their duties or are in breach of the Code of Conduct or any other applicable Hertie School policy. Should a member of the Research Ethics Committee be dismissed, the Dean of Research and Faculty will appoint a replacement to serve out the remainder of the term.
- c. Should a member of the Research Ethics Committee have a conflict of interest regarding a particular application, the Dean of Research and Faculty can serve as a substitute.

After approval and acknowledgment by the Academic Senate in mutual agreement with the President with prior comment of the Board of Trustees, this policy took effect as of 1 June 2022 and was amended on 24 May 2023.
