

Project ethics and governance policy

RCOT engages in a range of 'knowledge-gathering' activities which can include surveys with members, audits, service development or evaluation and commissioned projects or research. We support and are committed to:

- Protecting the data, welfare, rights, dignity, safety, and wellbeing of all those involved in our knowledge-gathering activities or research.
- Developing a quality culture where responsibilities and accountability are clearly defined.

This policy relates to knowledge-gathering activities undertaken by RCOT staff and UK branches (Specialist Sections and regional groups) and projects where RCOT is defined as the Research or Project Sponsor, that is 'The organisation or partnership that takes on overall responsibility for proportionate, effective arrangements being in place to set up, run and report a [research] project' (NHS Health Research Authority, 2022).

The policy aims to:

- Ensure the ethical integrity, and adherence to data protection requirements of knowledge-gathering activities involving RCOT members or other stakeholders.
- Ensure activities carried out have a sound methodology so that collated data and any decisions made are based on high quality information.
- Help prevent groups of members from being over-consulted and avoid replication of activities.
- Provide a level of protection for RCOT staff and members in terms of potential risks to individuals or the organisation.

It also ensures that we follow our roles and responsibilities as a professional body when conducting, hosting, sponsoring, or funding research and/or projects; employing or supporting researchers; or allowing research to be carried out with our backing; and that it promotes good practice for research and related activities (UK Research Integrity Office, 2022).

Responsibilities of RCOT, project leads and project reviewers

As a project sponsor, we need to ensure that everything is in place for a knowledge-gathering project before it begins. This means:

- being responsible for making sure there are arrangements in place to start, manage and fund the project
- being satisfied that the project has an appropriate review before it begins
- being satisfied that data protection is adequately addressed
- being satisfied that arrangements are in place for good practice when carrying out the project, for monitoring and reporting, including prompt investigation of any concerns or misconduct
- being responsible for maintaining a log of projects reviewed.

RCOT staff and other project leads (e.g. Chairs of RCOT branches) are responsible for making themselves aware of and following the project review process and clarifying any aspects that they are unclear about.

Project review process

The type of project and level of risk determines the review process undertaken. The RCOT project ethics and governance review process (PE2-22) describes the review process. Generally, market research and social media activities such as web polls and tweet chats, evaluation of member events, resources or training days do not need to follow the review process. Project work involving only RCOT staff does not normally need to follow the review process unless sensitive topics or issues are explored that might need an ethics or governance review. Please discuss this with the Director of People and Culture.

The project ethics and governance review process applies to the following activities:

Category A:

- service evaluation or service development activities (including member surveys, focus groups, interviews).
- audit activities
- RCOT consultations
- commissioned projects/consultation.

Category B: Research activity that aims to generate transferable and generalisable new knowledge by addressing clearly defined research questions using systematic and rigorous methods. This may be primary or secondary research.

An RCOT ethics review panel will review Category B research reviews. The RCOT research and development manager will organise this and it is chaired by the Chair of Council. If an NHS, Social Care, University or other external research ethics committee reviews a research project, evidence of the approval received should be sent to the RCOT research and development manager. An RCOT ethics review panel is not normally needed.

Refer to [the HRA decision tool](#) to help you decide whether your study is research as defined by the *UK Policy Framework for Health and Social Care Research (2020)*.

Externally sponsored research projects

As the professional body for occupational therapists, we often receive requests from members, non-members and other organisations about using our membership database, or mailing lists to identify potential participants for research recruitment or to take part in projects. Although we are keen to promote opportunities for involvement, we are not able to use our database to directly contact members about research or project recruitment. This is in the best interest of our members and follows guidance in the General Data Protection Regulation [GDPR] and Data Protection Act 2018. Further Information about recruitment of occupational therapists as research/project participants can be found on our website. We reserve the right to apply our Project ethics review process to any external project.

External consultations

RCOT and its branches also receive requests from other organisations and professional bodies (i.e. the Government, Health Education England, NHS) to circulate external consultations for our members to contribute to. Follow the current RCOT Consultation Process where external consultations are relevant to our members and fit with current business plans.

References

NHS Health Research Authority (2020) *UK Policy Framework for Health and Social Care Research*. Available at <https://www.hra.nhs.uk/planning-and-improving-research/policies-standards-legislation/uk-policy-framework-health-social-care-research/>

UK Research Integrity Office (2022) *Code of Practice for Research. Promoting good practice and preventing misconduct*. Available at <https://ukrio.org/publications/code-of-practice-for-research/1-0-introduction/>

NHS Health Research Authority (2022) *Roles and Responsibilities*. Available at [Roles and responsibilities - Health Research Authority \(hra.nhs.uk\)](https://www.hra.nhs.uk/roles-responsibilities) (All Accessed on 26/4/22)