

ESE research ethics policy

The Association of Universities in the Netherlands (VSNU) and the Royal Netherlands Academy of Arts and Sciences (KNAW) adopted the [Netherlands Code of Conduct for Research Integrity \(NCCRI\)](#) in 2018. The NCCRI is binding for all institutes that have ratified it, and this includes Erasmus University with all its faculties and research institutes. The NCCRI defines 5 principles of proper academic practice, them being honesty, scrupulousness, transparency, independence, and responsibility. Next to these principles, the NCCRI describes the standards for good research practices, the institutions' duties of care and the measures to be taken in cases of non-compliance. Under the institutions' duties of care, universities are required to set up ethical committees (Internal Review Boards – IRBs), which undertake ethical reviews where necessary. ESE obliges all its affiliated researchers to seek the approval of the relevant IRB in the following cases:

1. Research involving human subjects (see appendix a.)
2. Collecting and/or processing personal data (see appendix a.)
3. Potential harm to the researcher, staff and/or participants
4. Potential conflict of interest
5. Research design using deception
6. Covert form of field research
7. Novel or unusual research methods or tools are used
8. Use of the Erasmus Behavioral Lab and the ESE-Econlab
9. When gatekeepers¹ are involved in data collection
10. When research is conducted outside of the European Union (see appendix b.)
11. Ethical review requested by the funding body or the journal

If in doubt whether an IRB approval is needed, researchers are always invited to submit an application for review.

Application

Researchers should submit their applications to the relevant IRB **before the data collection begins**². This especially concerns primary data, that is data collected by the researcher. When working with secondary (archival) data, the IRB encourages researchers to submit applications before analyzing the data. In case of working with secondary personal data (see appendix a.), the IRB requires researchers to submit applications before analyzing the data. If a research project involves more than one researcher, the application should be submitted by the principal investigator. If the research, or at least the data collection, is carried out by bachelor or master students, then the application needs to be submitted by the project supervisor.

Ethical review process at ESE

The applicant submits the application with the data management plan and, if applicable, with relevant accompanying documents such as consent forms, surveys, experimental instructions, or privacy assessments. For the data management plan (DMP), applicants need to contact the Data Steward. The ESE

¹ Gatekeepers are persons whose permission is needed to access a target group. Examples are school directors, prisons wards, HR managers.

² Only in exceptional cases will the IRB evaluate projects where data collection is in progress or has been completed. Applicants are required to thoroughly explain their case then.

IRBs require applicants to complete the DMP prior to filing an ethical review application. DMP and privacy assessment are not requested for applications that are granted direct approval based on the screening survey of the experimental board. However, they may be required if the board sees fit.

Applications that are not granted direct approval, are received by the IRB coordinator who will initiate the review process. Upon receiving the application, the IRB strives to respond within two weeks. In exceptional cases, the process may take longer. Applications are reviewed by 2 board members and the chair. The allocation of an application to board members is such that potential conflicts of interest are minimized.

There are three possible outcomes of the review:

- The application is given direct approval
- The reviewers ask for additional information or clarification. In this case the applicant should respond to the feedback within one week.
- The application is rejected

Appeal

The decision of the IRB is always binding. Should researchers not be satisfied with the decision, they can appeal to the appeal board. The appeal board, which consists of the Scientific Director and two ad hoc members who are not members of any IRB, will review the research proposal and examine the IRB's reasoning for rejection. The Appeal Board will decide either to uphold the Board's decision or decides in favor of the applicant and grants approval.

Contacting external advisors

Members of the ethical review boards can consult external advisors for assistance in certain cases. For example, when none of the Board members have substantial expertise in the research field submitted for review, such as conducting research in non-EU countries. Experts can also be invited to deal with conflicts of interest. In these cases, the IRB may ask for an advice from an external advisor who is an expert in the relevant field. Her advice shall weigh in the decision of the IRB when granting approval. The external advisor's advice is not binding per se. An external advisor needs to be affiliated with a university and hold a PhD degree from an accredited institution.

Mandates

ESE has two distinct internal review boards, one for experimental and one for non-experimental research. The boards are to meet regularly as seen fit by the chairs. Each board needs to have at least 4 members. The boards have a joint secretary (IRB coordinator) who oversees communication, administrative matters, privacy, and policy issues. A board member needs to have an assistant professor degree or higher. The chair and the vice-chair must be full professors. All members are appointed initially for a period of 3 years, which is renewable once for another period of 3 years. In case a member wants to resign, the Chair of the IRB and the Scientific Director of ESE needs to be notified in writing, three months prior to the desired date of resignation.

Appendix a

This appendix concerns the cases in which IRB approval is needed. This expands on the scenarios listed.

Point 1 – examples of vulnerable groups:

- Children (under the legal age of country of study)
- Elderly (after retirement age in the country of study)
- Disabled, patients, sick
- Refugees
- Prisoners
- Dependent/unequal relationships (e.g. a faculty member's own students)
- Illiterate population
- Any other group the researcher deems vulnerable

Point 2 – sensitive personal data (including GDPR Article 9):

- Racial/ethnic origin
- Political opinions
- Religious or philosophical beliefs
- Genetic and biometric data
- Self-assessed health data
- Data concerning a natural person's sex life or sexual orientation
- Trade union membership
- Personality variables
- Psychological measurements
- Past behavior (incarceration, crime involvement, substance abuse)

Appendix b

This appendix aims to provide guidelines on good conduct when it comes to research outside of the European Union.

When a researcher conducts research outside of the European Union, there are some special considerations. Cultural and political sensitivities need to be weighed in, and the research should not disregard these sensitivities. Voluntary participation needs to be ensured with informed consent. This is especially important when an illiterate population is studied. We advise researchers who carry out research in non-EU countries to develop a framework for tackling these issues. In turn, the IRB informs the researchers about their responsibilities. Finally, ethical approvals granted by ESE in no way replace local codes of conduct and researchers still have to follow those. Researchers should strive to obtain local IRB approval where feasible.