

Research Access and Ethical Approval Policy and Procedure for External Researchers

CODE:	P091
OPERATIONAL OWNER:	Chief Operating Officer – Academia
REVIEW DATE:	August 2027
POLICY VERSION:	1

Version History

VERSION	DESCRIPTION	AUTHORS	APPROVAL	EFFECTIVE DATE
1	Initial version		Pending	Pending

Related Policies

P022 – Intellectual Property

P028 – Students’ Research

P031 – Against Plagiarism

P043 – Institutional Research Policy and Procedure

P064 – Academic Freedom and Integrity

P0XX – Peer Review Policy and Procedure for Academic Research and Publications

ITS Data Protection Policy and Privacy Notices (code to be confirmed)

ITS Safeguarding Policy (code to be confirmed)

Research Ethics Committee Terms of Reference

Academic Research and Publications Board Terms of Reference

ITS Strategic Plan 2026–2030, Section 9.1

External References

Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG 2015), Standards 1.1, 1.7 and 1.8

ALLEA, The European Code of Conduct for Research Integrity (revised edition 2023)

Regulation (EU) 2016/679 (General Data Protection Regulation) and the Data Protection Act (Cap. 586 of the Laws of Malta)

Protection of Minors (Registration) Act (Cap. 518 of the Laws of Malta)

European Commission, Ethics in Social Science and Humanities (2021)

MFHEA National Quality Assurance Framework for Further and Higher Education, Standards 1, 7 and 8

Definitions

Adverse event	Any unanticipated event arising in the course of approved research that causes, or could cause, harm or distress to participants or damage to the ITS.
Data sharing agreement	A written agreement between the ITS and an external researcher or their home institution governing the transfer, use, security and retention of personal data disclosed by the ITS.
Ethical approval	The written decision of the REC that a research project may proceed at the ITS, with or without conditions.
External researcher	Any person who is not a registered student of the ITS and who wishes to collect data from ITS students, staff or records, to use ITS premises or facilities for research, or to name the ITS as a research site. This includes students of other institutions at any level, academic staff of other institutions, consultants, and staff of public bodies, industry partners and non-governmental organisations.
Gatekeeper	The ITS office that controls access to a participant group. The Registrar's Office is the gatekeeper for students and the Human Resources Office is the gatekeeper for staff.
Home institution	The university, college or organisation to which the external researcher is affiliated and which bears primary responsibility for the researcher's conduct and for ethical approval of the project at source.
Minor	A person under the age of eighteen years.
Participant	A student, member of staff or other person connected with the ITS who takes part in research by completing a survey, taking part in an interview, focus group or observation, or providing data in any other form.
Personal data	Any information relating to an identified or identifiable natural person, as defined in the GDPR.
Research	Any systematic investigation designed to produce generalisable or transferable knowledge, including dissertations, theses, commissioned studies, evaluations and pilot studies.
Research Ethics Committee	The ITS body responsible for the ethical review and approval of research involving human participants, personal data or ITS premises, as constituted under its Terms of Reference. The Strategic Plan 2026–2030 refers to this body as the Research Ethics Board.

Vulnerable person	A person whose capacity to give free and informed consent may be limited, including minors, persons with a disability affecting capacity, and persons in a dependent relationship with the researcher.
--------------------------	--

Abbreviations

ARPB	Academic Research and Publications Board
COO – Academia	Chief Operating Officer – Academia
DPO	Data Protection Officer
EEA	European Economic Area
ESG	Standards and Guidelines for Quality Assurance in the European Higher Education Area
GDPR	General Data Protection Regulation
HR	Human Resources Office
IQAU	Internal Quality Assurance Unit
ITS	Institute of Tourism Studies
MFHEA	Malta Further and Higher Education Authority
REC	Research Ethics Committee
RO	Research Office

Contents

TOC \o "1-3" \h \z \u

A. Purpose, Scope and Principles	6
B. Roles and Responsibilities.....	7
C. Application and Review Procedure	9
D. Conduct of Approved Research	11
E. Ethical Principles and Integrity.....	13
F. Complaints and Appeals	13
G. Records and Document Retention.....	14
H. Monitoring and Review.....	14
I. Document Control.....	14

A. Purpose, Scope and Principles

1. Purpose

This policy sets out how the ITS receives, reviews and decides on requests from external researchers to conduct research involving ITS students, staff, records or premises, and the conditions under which approved research is conducted. It protects the rights, safety, wellbeing and personal data of participants, safeguards the integrity of institutional data, ensures that research conducted on the ITS community meets recognised European standards of research ethics and integrity, and gives the ITS a complete record of external research conducted on its community.

The policy gives effect to Standard 1.1 of the ESG 2015, under which an institution's quality assurance policy supports academic integrity and freedom and guards against intolerance and discrimination, and to Standards 1.7 and 1.8 on the responsible collection, management and publication of information. It applies the four principles of the ALLEA European Code of Conduct for Research Integrity: reliability, honesty, respect and accountability.

2. Scope

This policy applies to:

- All external researchers, as defined, irrespective of the level, funding or purpose of the research.
- All research that involves ITS students, staff or alumni as participants, that uses ITS records, data or systems, that takes place on ITS premises or during ITS activities including placements and industry visits organised by the ITS, or that names the ITS as a research site.
- Research conducted at the ITS Training School and at any ITS transnational education campus, unless a local procedure has been approved by the REC.

This policy does not apply to:

- Research conducted by registered students, which is governed by P043, P028 and the REC Terms of Reference.
- Statutory data requests from the MFHEA, the National Statistics Office or any other public authority acting under a legal power.
- Market research, customer satisfaction or marketing activity commissioned by the ITS, which is governed by the relevant procurement and data protection procedures.

3. Principles

The ITS applies the following principles to all external research:

- Participation is voluntary. No student or member of staff shall be required, or made to feel required, to take part in external research, and non-participation shall carry no consequence.
- Consent is informed. Participants shall receive clear information on the purpose of the research, what participation involves, how their data will be used and stored, and their right to withdraw.
- Data protection by design. Personal data shall be collected only where necessary, kept secure, and retained no longer than required.
- Proportionality. The depth of ethical review shall be proportionate to the risk the research presents to participants and to the ITS.
- Academic freedom. The ITS does not seek to influence the findings or conclusions of external research. Its role is to protect participants and institutional data, not to approve or disapprove results.
- Non-endorsement. Approval under this policy signifies that the ITS has no objection to the research being conducted on its community. It does not constitute endorsement of the research, its methods or its findings.
- Reciprocity. The ITS expects to receive the findings of research conducted on its community so that they can inform institutional development.
- Transparency. Decisions and their reasons shall be communicated in writing and shall be open to complaint and appeal.

B. Roles and Responsibilities

4. Research Ethics Committee

- The REC is the sole body competent to grant, condition, refuse or withdraw ethical approval for external research at the ITS. Its decisions on ethical matters shall not be overridden by any other officer or body.
- The REC shall conduct reviews in accordance with this policy and its Terms of Reference, shall keep a register of applications and decisions, and shall report annually to the ARPB.
- The Chair of the REC may take decisions on behalf of the REC in the cases of expedited review set out in clause 15.

5. Research Office (RO)

- The RO shall act as secretariat to the REC for the purposes of this policy, shall manage the research ethics mailbox, shall screen applications for completeness, and shall maintain the register of external research.

- Until the RO is operational, these functions shall be discharged by the Office of the COO – Academia.

6. Gatekeepers

- The Registrar’s Office shall control access to students and student records. The HR Office shall control access to staff and staff records.
- Gatekeepers shall act only on the written instruction of the REC and shall not release contact details or personal data to external researchers.

7. Data Protection Officer

- The DPO shall be consulted by the REC on any application that involves personal data, special categories of personal data, or transfer of data outside the EEA, and shall advise on whether a data sharing agreement or a data protection impact assessment is required.

8. Academic Research and Publications Board

- The ARPB shall exercise general oversight of research activity at the ITS, shall receive the annual report of the REC, and shall provide members for the appeals panel under Section F. The ARPB shall not review individual applications.

9. Chief Operating Officer – Academia

- The COO – Academia is the operational owner of this policy, shall ensure that the offices named in it are resourced to discharge their roles, and shall sign data sharing agreements and other formal instruments on behalf of the ITS.

10. External researchers

External researchers shall:

- hold, and provide evidence of, ethical approval or an equivalent formal clearance from their home institution before applying to the ITS, where the home institution provides such a mechanism;
- provide written endorsement from their supervisor or line manager;
- comply with the conditions of ITS approval, this policy, the GDPR and the Data Protection Act, and the ALLEA Code;
- conduct the research only as approved, and seek approval for any amendment before implementing it;
- report adverse events to the REC without delay;
- protect the anonymity of participants and, where a condition to that effect applies, of the ITS, and refrain from publishing data that identifies individual participants;

- provide the ITS with a copy of the findings as set out in clause 25; and
- acknowledge the ITS in any output arising from the research.

11. Home institutions

- The home institution remains responsible for the conduct of its researcher and for the supervision of student research. Approval by the ITS does not transfer that responsibility.

C. Application and Review Procedure

12. Enquiry and acknowledgement

- Requests to conduct research at the ITS shall be made by email to the research ethics mailbox (ethics.arpb@its.edu.mt).
- The RO shall acknowledge the request within ten working days and shall send the applicant the application form, this policy and the fee information. (not including the summer recess).
- Requests received fewer than twenty working days before the intended start of data collection may be declined on timing grounds alone.

13. Application pack

A complete application shall comprise:

1. the ITS External Research Application Form, signed by the researcher and, where applicable, the supervisor;
2. a research protocol or proposal setting out aims, methods, sample, timeline and the target ITS population;
3. all data collection instruments, including questionnaires, interview or focus group guides and observation schedules;
4. the participant information sheet and consent form and, where minors may participate, parental or guardian information and consent materials;
5. evidence of ethical approval or clearance from the home institution, or a statement from the home institution that no such mechanism exists;
6. a data management statement covering the lawful basis for processing, storage location and security, anonymisation, retention period and disposal;
7. a valid police conduct certificate and, where the research involves contact with minors, evidence of clearance under the Protection of Minors (Registration) Act (Cap. 518);
8. a short curriculum vitae of the researcher; and

9. confirmation of payment of the processing fee.

14. Processing fee

- A processing fee, as set in the ITS Schedule of Fees approved by the Board of Governors of EUR 80, is payable on submission of a complete application. The fee is not refundable.
- The fee is waived for research commissioned by the ITS, for researchers from institutions with which the ITS holds a formal partnership or consortium agreement, for public authorities and for ITS employees.
- The REC may waive the fee in other cases on written request where the research is of demonstrable benefit to the ITS.

15. Screening and level of review

- The RO shall screen the application for completeness within ten working days of receipt and shall return incomplete applications with a list of the missing items. (not including the summer recess)
- Expedited review, by the Chair of the REC and one other member, applies where the research involves only adults, uses anonymous or non-sensitive data, presents no more than minimal risk, and does not use ITS premises beyond the circulation of an online instrument.
- Full review, by the REC in session, applies in all other cases, including research involving minors or vulnerable persons, special categories of personal data, deception, audio or video recording, physical presence on ITS premises, or access to student or staff records.
- The REC may reclassify an application at any stage.

16. Timelines

- Expedited review: decision within fifteen working days of receipt of a complete application.
- Full review: decision within thirty working days of receipt of a complete application, or at the next scheduled meeting of the REC where that is later, provided that the applicant is informed of the expected decision date.
- Where the REC requests revisions, the applicant shall respond within sixty working days, failing which the application shall be treated as withdrawn.
- Timelines are suspended during periods of institutional closure.

17. Outcomes

The REC shall record one of the following outcomes:

- A. Approved.

- B. Approved subject to conditions, which shall be stated in writing and shall be satisfied before data collection begins.
- C. Revise and resubmit, with the required changes stated in writing.
- D. Not approved, with reasons.

18. Validity, amendments and adverse events

- Approval is valid for twelve months from the date of the decision, or for the period stated in the approval, and may be extended once on written request.
- Any change to the approved protocol, instruments, sample or data management arrangements shall be submitted to the REC as an amendment and shall not be implemented until approved. Minor amendments may be approved by the Chair of the REC.
- Adverse events shall be reported to the REC within two working days. The REC may suspend or withdraw approval pending investigation.

D. Conduct of Approved Research

19. Access to participants

- On approval, the RO shall instruct the relevant gatekeeper in writing. The gatekeeper shall circulate the approved invitation, information sheet and instrument to the target population on one occasion and may send one reminder at the researcher's request.
- Circulation shall state that the research is external, that ITS approval does not constitute endorsement, and that participation is voluntary.
- The ITS shall not release contact lists, class lists or personal data to external researchers. Participants shall respond directly to the researcher.
- Where the target population has already received two or more external research invitations in the current semester, the REC may defer circulation to protect participants from over-research.
- Incentives offered to participants shall require REC approval and shall be proportionate.

20. Data protection

- The external researcher, or their home institution, is the data controller for data collected directly from participants. The ITS does not process such data on the researcher's behalf.
- Where the research requires the ITS to disclose personal data from its records, the ITS remains controller of that data, a lawful basis shall be identified with the DPO, and a data sharing agreement shall be signed by the COO – Academia before any disclosure. Wherever possible, data shall be disclosed in anonymised or aggregated form.

- Data shall be stored securely, shall not be transferred outside the EEA without appropriate safeguards, and shall be destroyed or anonymised at the end of the retention period stated in the application.

21. Research involving minors and vulnerable persons

- Research involving ITS students under the age of eighteen shall require parental or guardian consent in addition to the assent of the student, and shall be subject to full review.
- Researchers who will have direct contact with minors shall provide evidence of clearance under Cap. 518 and shall be accompanied on premises by a member of ITS staff.
- The REC may require additional safeguards for research involving any vulnerable person.

22. Use of ITS premises and facilities

- Research on ITS premises shall be scheduled with the relevant Head of Department so that it does not disrupt teaching, assessment or operations.
- External researchers on premises shall comply with ITS health, safety and visitor procedures and shall be identifiable as visitors.

23. Confidentiality and identification of the ITS

- Unless the approval states otherwise, the ITS may be named as a research site. The REC may require that the ITS be anonymised where publication of identifiable findings could prejudice participants.
- External researchers shall not disclose confidential institutional information obtained in the course of the research.

24. Insurance and liability

- External researchers shall be covered by the insurance of their home institution or by their own professional indemnity insurance. The ITS accepts no liability for the conduct of external research beyond its own statutory obligations.

25. Reporting of findings

- The external researcher shall provide the RO with an electronic copy of the dissertation, thesis, report or article arising from the research within six months of its completion or publication, whichever is earlier, together with a short summary suitable for internal circulation.
- The RO shall place the summary in the external research register and shall forward it to the ARPB and to the department concerned.

- Where the approval provides for it, the ITS may comment on matters of factual accuracy before publication, but shall not seek to alter findings, interpretations or conclusions.

E. Ethical Principles and Integrity

26. Research integrity

- All research conducted under this policy shall observe the ALLEA European Code of Conduct for Research Integrity. Fabrication, falsification, plagiarism and misrepresentation of data constitute grounds for withdrawal of approval and notification of the home institution.

27. Conflicts of interest

- External researchers shall declare any relationship with the ITS, its staff or its students, and any funding source, that could be perceived to affect the research.
- Members of the REC shall withdraw from the review of any application in which they have a personal, professional or financial interest.

28. Non-compliance

- Where an external researcher fails to comply with the conditions of approval or with this policy, the REC may suspend or withdraw approval, require the destruction of data collected in breach, notify the home institution, and decline future applications from the researcher.

F. Complaints and Appeals

29. Complaints

- Participants, ITS staff and external researchers may submit a complaint in writing to the REC, through the research ethics mailbox, concerning the conduct of research under this policy or the handling of an application.
- The REC shall respond within twenty working days. Complaints concerning the conduct of the REC itself shall be directed to the COO – Academia.

30. Appeals

- An external researcher may appeal a decision of the REC within twenty working days of notification, on the grounds of procedural irregularity or of a decision that no reasonable committee could have reached on the evidence before it. Disagreement with the ethical judgement of the REC is not in itself a ground of appeal.
- Appeals shall be heard by an independent panel of three members of the ARPB who are not members of the REC and who had no involvement in the decision. Where insufficient

ARPB members are available, other suitably qualified academic staff of the ITS shall be invited to serve. The panel shall consist of a Chair and two members.

- The panel may confirm the decision or refer it back to the REC for reconsideration with reasons. The panel shall not itself grant approval.
- A decision on the appeal shall be issued within twenty working days of submission and shall be final.

31. Record keeping

- All complaints, appeals and their outcomes shall be formally recorded and securely archived.

G. Records and Document Retention

Category	Retention Period
Applications, REC decisions, conditions, amendments and correspondence	10 years from the date of the final decision, or until the conclusion of any related complaint, appeal or investigation, whichever is later
External research register and REC annual reports	Permanent
Copies of findings received under clause 25	10 years

H. Monitoring and Review

The REC shall report annually to the ARPB on applications received, outcomes, review timelines, adverse events and complaints. The IQAU shall use this report as evidence for internal and external quality assurance purposes.

This policy shall be reviewed every three years, or earlier if required by regulatory or institutional change, including the establishment of the Research Office and any change to the REC Terms of Reference.

I. Document Control

Version	Purpose of Review/ Changes	Date Published	Date of Next Review
1	Initial version	Pending	Three years from publication