

RSM 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 Rotterdam with all its faculties and research institutes. The NCCRI defines five principles of proper academic practice: honesty, scrupulousness, transparency, independence, and responsibility. In addition 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. RSM obliges all its affiliated researchers to seek the approval of the relevant IRB in the following situations:

1. Research involving human subjects (see appendix a.)
2. Collecting and processing personal data (see appendix a.)
3. Potential harm to the researcher, staff and 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 or not, researchers are always invited to apply 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

¹ Gatekeepers are people 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 in process or complete. Applicants are required to thoroughly motivate their request.

working with secondary (archival) data, the IRB encourages researchers to submit applications. When working with secondary personal data (see appendix a.), the IRB requires researchers to submit applications. Research projects that include more than one researcher should always be submitted for review by the lead researcher. If the research, or at least the data collection, is carried out by bachelor or master students, then the proposal must be submitted by the project supervisor.

Ethical review process at RSM

The applicant submits the application with the data management plan and, if applicable, with relevant accompanying documents such as consent forms, surveys or privacy assessment. For the data management plan (DMP), applicants need to contact the data steward. RSM's IRBs require applicants to complete the data management platform (DMP) prior to filing an ethical review application. A 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. This coordinator will initiate the review process. The IRB strives to respond within two weeks. The process may take longer in exceptional cases. Applications are reviewed by two board members and the chair. Potential conflicts of interest are minimized when allocating an application to board members. There are three possible outcomes of the review:

- The application is given direct approval.
- The reviewers ask for additional information or clarification, after which the applicant must 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. In the future, the Erasmus University of Rotterdam, will establish and central ethical appeal board, which will receive and process all appeals. Until then, the temporary appeal board consists of the scientific director of RSM 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 whether to stick to the IRB's decision, or to grant approval to the applicant after all.

Contacting external advisors

Members of the internal review boards can consult external advisors for assistance in certain cases. For example, when none of the IRB members have substantial expertise in the research field submitted for review. Experts can also be invited to deal with conflicts of interest. In these situations, the IRB may ask for advice from an external advisor who is an expert in said field. An external advisor needs to be affiliated with a university and holds a PhD degree from an accredited institution. Their advice shall influence the decision of the IRB when granting approval.

Mandates

RSM 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 must have at least five members. The boards have a joint IRB coordinator who oversees communication, administrative matters, privacy and policy issues. A board member needs to be at least an assistant professor, and the chair and the vice-chair must be full professors. All members are appointed initially for a period of three years, which is renewable once for another period of three years. If a member wants to resign, they must notify the IRB's chair and RSM's scientific director in writing at least three months prior to the desired date of resignation.

Appendix a.

Situations in which IRB approval is needed.

Point 1 – vulnerable groups:

- children (under the legal age of country of study)
- elderly (after retirement age in the country of study)
- disabled, sick
- refugees
- prisoners
- dependent or unequal relationships (for example a faculty member's students)
- illiterate population
- any other group the researcher deems vulnerable

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

- racial or ethnic origin
- political opinions
- religious or philosophical beliefs
- genetic and biometric data
- data concerning a person's sex life or sexual orientation
- trade union membership
- personality variables
- psychological measurements
- past behavior, such as incarceration, crime involvement and substance abuse

Appendix b.

Guidelines on good conduct when it comes research outside of the EU.

Specific circumstances must be considered when a researcher conducts research outside of the European Union. Cultural and political sensitivities must be weighed in, and the research should be conducted in such manner that it does not disregard these sensitivities. Voluntary participation needs to be ensured with informed consent. This is especially important when an illiterate population is studied.

The RSM IRBs advise researchers who carry out research in non-EU countries to develop a framework for tackling these issues. In turn, the IRB informs the researcher about their responsibilities. Finally, it must be stated that ethical approvals granted by RSM in no way omit the researcher from the local code of conduct, and that researchers should strive to obtain local IRB approval where feasible.