

# Research Ethics Policy and Procedure

Effective from 18<sup>th</sup> December 2025 [Version 2.0]

## PREAMBLE

Triagon Academy is firmly committed to the highest standards of research ethics and integrity. As an institution of higher education operating within the European Higher Education Area, Triagon aligns its ethical governance structures with international best practices, including the European Code of Conduct for Research Integrity (ALLEA, 2017), the OECD Principles of Good Laboratory Practice, and the ethical frameworks adopted by leading European universities. The Academy recognises that ethical research is fundamental not only to scholarly excellence but also to the protection of human dignity, the advancement of knowledge, and the cultivation of public trust. Consequently, all individuals involved in research at Triagon—students, supervisors, academic staff, and members of review bodies—are expected to uphold these standards in a consistent and rigorous manner.

The purpose of this policy is to clearly articulate the ethical expectations and procedural steps governing research activities at Triagon Academy. It provides a coherent framework that guides researchers through the ethical dimensions of planning, conducting, and disseminating research. These guidelines ensure that every research project proceeds with careful consideration for legal requirements, institutional standards, and the welfare of participants.

## POLICY

### 1. SCOPE OF APPLICATION

This policy applies to all research activities undertaken under the auspices of Triagon Academy, including but not limited to undergraduate capstone projects, postgraduate dissertations, doctoral theses, independent research studies, and supervisor-led investigations involving students. The policy covers all instances in which human participants who are at psychological or physical risk, institutional collaboration, or ethically sensitive material are involved. It also extends to research that may not involve direct interaction with participants but nonetheless raises ethical considerations, such as data mining, sensitive secondary data analysis, or observational studies in public settings.

Every student enrolled in a research-bearing programme must comply with this policy. Supervisors, academic tutors, members of the Examination Commission, and the Research Project Ethics Board (RPEB) likewise carry distinct responsibilities to ensure the integrity and safety of the research environment. The policy thus establishes a comprehensive system of accountability that ensures ethical compliance at every stage of the research lifecycle.

### 2. ETHICAL FRAMEWORK AND PRINCIPLES

Triagon Academy's ethical framework draws inspiration from longstanding ethical traditions in European academia, emphasising respect, integrity, fairness, and responsibility. These principles underpin all decisions related to research design, participant engagement, data management, and dissemination.

Integrity is at the core of ethical research practice. Researchers must demonstrate honesty and transparency when reporting methods, findings, and limitations. Fabrication, falsification, plagiarism, or any other form of research misconduct is inconsistent with Triagon's values and will not be tolerated. Integrity also requires careful stewardship of data, respect for intellectual property, and proper acknowledgment of collaborative contributions.

Respect for human participants is a foundational element of this policy. Research involving people must safeguard their autonomy, dignity, privacy, and welfare. Participants must be fully informed of the aims and procedures of the study, the nature of their involvement, and their rights—including the right to withdraw at any time without penalty. Consent must be freely given, documented, and based on a clear understanding of the research.

The principle of minimisation of harm requires researchers to proactively identify and mitigate any foreseeable risks associated with participation. These may include physical discomfort, psychological distress, reputational harm, or legal implications. Researchers must design methods that prioritise participant safety and must refrain from conducting studies that impose unnecessary or disproportionate risks.

Independent ethical review is another cornerstone of responsible research. Any project which will be conducted under the name of Triagon and that raises potential ethical issues must undergo review by the RPEB, ensuring that decisions about risk management, participant welfare, and methodological soundness are subjected to objective scrutiny.

Finally, the principle of responsible data governance underscores the importance of complying with the EU General Data Protection Regulation (GDPR), Maltese data protection laws, and Triagon's internal data policies. Personal data must be collected lawfully, stored securely, used for legitimate research purposes, and retained only as long as necessary. Wherever possible, data should be anonymised to protect participant identities.

### 3. THE ETHICS SCREENING PROCESS

As part of the thesis registration procedure, every student is required to complete an Ethical Self-Assessment Form. This form prompts students to reflect on the ethical dimensions of their proposed research, including participant recruitment, data handling, and potential risks. Students must answer these questions truthfully and comprehensively, as the accuracy of this self-assessment determines whether the project requires formal review by the RPEB.

The Examination Commissions are responsible for reviewing each thesis registration and ethical declaration. Commission members consider not only the student's responses but also the methodological and contextual features of the proposed study. Where the Commission identifies elements that may involve ethical risk—such as interaction with human subjects, collection of sensitive data, involvement of vulnerable populations, or institutionally regulated settings—the student will be required to submit a full ethics review application to the RPEB. This requirement serves as a safeguard to ensure that no ethically sensitive research proceeds without adequate oversight.

#### 4. THE RESEARCH PROJECT ETHICS BOARD (RPEB)

The RPEB serves as Triagon's central ethics review authority. Its mandate is to uphold ethical standards, protect participants, guide researchers, and ensure compliance with institutional, national, and international requirements. The Board conducts thorough evaluations of ethics applications and offers constructive feedback aimed at strengthening the ethical quality of research proposals.

The RPEB evaluates each submission on the basis of scientific merit, ethical justification, methodological appropriateness, risk assessment, consent procedures, data protection measures, and the student's readiness to undertake research responsibly. Decisions may result in approval, conditional approval pending revisions, or refusal in cases where ethical concerns cannot be adequately resolved. The Board operates according to transparent procedures and maintains detailed records of all decisions.

The RPEB shall be composed of the following members:

Chairperson – to be appointed by the President or his/her/their delegate

Member 1 - to be appointed by the President or his/her/their delegate

Member 2 - to be appointed by the President or his/her/their delegate

Member 3 - to be appointed by the President or his/her/their delegate

Student representative – this can be either the president of the Student body or his/her/their delegate

The duration of the appointment shall be specified in the official letter of appointment

#### Terms of Reference of the RPEB

The Chairperson's responsibilities shall include:

- Convening the meetings and managing proceedings in line with all the relevant policies and procedures and the dissertation timeline set out by Triagon;
- Running of the meetings in such a way that leads to taking final decisions;
- Consulting in a jointly manner with RPEB Members;
- Request for clarification (when necessary) from RPEB Members and other relevant Boards/Committees related to Triagon's theses modulea;
- Provide amendments, recommendations and/or subsequently endorse the minutes of the meetings following approval by the RPEB;

- Having a casting vote in case of a tie in votes;
- Liaising with secretary to prepare documentation on the items of the agenda;
- Proposing any ad-hoc experts to be invited to attend the meeting/s, if necessary.
- Endorsing the minutes of the meetings following approval by the RPEB;
- Drafting policy documents in accordance with the recommendation / agreements discussed during the meeting/s;
- Drafting Standard Operating Procedures in accordance with the recommendation / agreements discussed during the meeting/s.

The RPEB shall have a quorum of at least two thirds of its members present at a meeting. The RPEB shall seek to make decisions in a unanimous manner. However, in the absence of a unanimous decision, a simple majority of votes cast suffices for a proposal to pass. In the case of a tie in votes the chairperson shall have a casting vote.

The Chairperson of the Board shall designate one of the members to act as secretary to produce a record of each meeting. Draft minutes shall be circulated at least five (5) days after each meeting and approved via email within five (5) days.

Any proposed amendments to the minutes shall be placed on the agenda for the next meeting for formal approval of the RPEB.

Amendments The RPEB may at any time change these terms of reference to exercise its mission in accordance with the necessities of Triagon. A copy of the amended terms of reference will be forwarded to the members in writing.

## PROCEDURES FOR ETHICAL REVIEW

The ethical review process unfolds through several structured steps:

### 5. Thesis Registration and Initial Ethical Reflection

Students begin by submitting their thesis registration form, which includes a dedicated section for ethical reflection. This initial reflection encourages students to consider from the outset whether their research design raises issues that require further attention.

### 6. Assessment by the Examination Commission

The Commission examines the student's declarations and supporting documents to determine the level of ethical sensitivity involved in the project. Where ethical concerns are identified, the student is formally required to prepare a full ethics application for RPEB review.

### 7. Submission of the Ethics Application

A complete ethics submission includes all materials necessary for the RPEB to undertake a comprehensive evaluation. This may include participant information sheets, informed consent forms, research tools such as questionnaires or interview guides, risk assessments, and letters of institutional permission when access to regulated environments is required. These documents must comply with the requirements outlined in the Triagon Research Ethics Application Form (Refer to Annex I).

### 8. Review and Decision

The RPEB reviews the submission within the prescribed timeframe. If the Board requires clarifications or modifications, these will be communicated to the student and supervisor. Conditional approvals may be granted when concerns can be addressed through minor revisions. Full approval is required before any data collection may begin.

### 9. Conducting the Research

Once approval is granted, the student must conduct research exactly as described in the approved application. Deviations from the approved protocol are not permitted without submitting an amendment request to the RPEB.

## 10. Amendments and Continuing Ethical Obligations

If changes in method, participant population, or data collection tools arise during the research process, these must be submitted to the RPEB for review. Ethical responsibility is ongoing, and students must remain vigilant in maintaining compliance.

### RESPONSIBILITIES OF KEY STAKEHOLDERS

Students bear primary responsibility for ensuring that their research complies with ethical standards. They must familiarise themselves with institutional policies, accurately assess ethical risks, prepare thorough documentation, and conduct research in a manner that respects participants and preserves data integrity.

Supervisors play a central role in guiding ethical decision-making. They must assist students in understanding ethical principles, reviewing research instruments, evaluating risks, and ensuring that students are adequately prepared to conduct ethically sensitive research. Supervisors must also sign off on ethics applications, certifying that they have reviewed and approved the materials.

The Examination Commission is tasked with ensuring that the initial ethical screening process is rigorous. Its members must exercise sound judgement in identifying research that requires further evaluation. Their decision to refer a project to the RPEB is essential for maintaining Triagon's institutional integrity.

The RPEB carries ultimate responsibility for ensuring that ethically sensitive research is properly reviewed. It serves both as a safeguard and as a source of expert guidance, contributing to a research culture characterised by responsibility, professionalism, and care.

## DATA PROTECTION AND CONFIDENTIALITY

All research conducted at Triagon must comply fully with European data protection legislation. Personal data may only be collected for lawful research purposes and must be minimized to those variables strictly necessary to achieve the research objectives. Researchers are required to store data securely, protect it through encryption or password controls, and limit access to authorised individuals only. Anonymisation or pseudonymisation should be employed wherever feasible to minimise the risk of identification.

Participants must be informed of their rights under GDPR, including the right to access, rectify, or in certain circumstances request deletion of their data. Disclosure of data to third parties is strictly forbidden unless explicitly authorised or required for academic verification.

## NON-COMPLIANCE AND DISCIPLINARY CONSEQUENCES

Research conducted without ethical approval, or in violation of the approved protocol, constitutes a serious breach of institutional policy. Consequences may include the suspension of research activity, academic penalties, invalidation of the dissertation or thesis, or—where misconduct is evident—formal disciplinary proceedings. Triagon Academy emphasises that ethical conduct is not merely procedural but reflects the integrity and professionalism expected of all scholars.

## POLICY REVIEW

This Research Ethics Policy is reviewed periodically by the Academic Senate to ensure that it remains aligned with evolving ethical expectations, legal obligations, and scholarly standards across Europe. Updates may be introduced to reflect new legislation, emerging research methodologies, or feedback from institutional stakeholders.

Marsa, December 18<sup>th</sup> 2025



Signed by

Prof Dr Glen Farrugia  
Acting President and Deputy Chair of the Senate



**Post-Graduate Research Ethics**  
**Application Form**

Version June 2021

§1 Information for applicants

Students submitting a proposal to the Research Project Ethics Board (RPEB) for approval need to submit a proposal for ethical clearance. The following checklist must be submitted to the RPEB with the necessary documentation on [pruefungsam@triagon.mt](mailto:pruefungsam@triagon.mt) within eight (8) weeks of the approval of the thesis registration. The RPEB will seek to process the application within four (4) weeks excluding the recesses and national/ public holidays as per Triagon Academy Academic Calendar.

Please make sure to tick ALL the items. Incomplete forms will not be accepted.

		YES	NOT NEEDED
1a.	Recruitment letter/ information sheet for subjects, in English		
1b.	Recruitment letter/ information sheet for subjects, in Maltese		
2a.	Consent form, in English, signed by supervisor, and including your contact details		
2b.	Consent form, in Maltese, signed by supervisor and including your contact details		
3a.	In the case of children or other vulnerable groups, consent forms for parents/ guardians, in English		
3b.	In the case of children or other vulnerable groups, consent forms for parents/ guardians, in Maltese		
4a.	Tests, questionnaires, interview or focus group questions, etc in English		
4b.	Tests, questionnaires, interview or focus group questions, etc in Maltese		
5a.	Other institutional approval for access to subjects: Health Division, Directorate for Quality and Standards in Education, Department of Public Health, Curia...		
5d.	Other institutional approval for access of data: Registrar, Data Protection Officer Health Division/ Hospital, Directorate for Quality and Standards in Education, Department of Public Health...		
5c.	Approval from Person Directly responsible for subjects: Medical Consultants, Nursing Officers, Head of School		

**For RPEB Use Only:**

Received by RPEB	
Discussed by RPEB on	
Approved by RPEB on	

**§2 Request for Approval of Human Subjects Research**

**Please type. Handwritten forms will not be accepted.**

FROM: ( <i>name, address for correspondence</i> )	DISSERTATION/THESIS TITLE:
MOBILE NO.	
EMAIL:	
COURSE AND YEAR:	
DURATION OF RESEARCH: From: To:	TUTOR'S NAME AND EMAIL ADDRESS:

1. Please give a brief summary of the research methodology and why it includes human subjects.

2. Give details of procedures that relate to subjects' participation: (a) How are subjects recruited? What inducement is offered? (*Append copy of letter or advertisement or poster, if any.*)

(b) Salient characteristics of subjects – number who will participate, age range, sex, institutional affiliation, other special criteria:

(c) Describe how permission has been obtained from cooperating institution(s) – company, school, hospital, non-profit organisation, and other relevant organization (*append letters*).

(d) What do subjects do, or what is done to them, or what information is gathered? (*Append copies of instructions or tests or questionnaires*) How many times will observations, test, etc., be conducted? How long will their participation take?

(e) Which of the following data categories are collected? Please tick where appropriate.

Data that reveals:

Race and ethnic origin	<input type="checkbox"/>
Political opinions	<input type="checkbox"/>
Religious and philosophical beliefs	<input type="checkbox"/>
Trade union memberships	<input type="checkbox"/>
Health	<input type="checkbox"/>
Sex life	<input type="checkbox"/>
Biological information	<input type="checkbox"/>

3. How do you explain the research to subjects and obtain their informed consent to participate? (*If in writing, append a copy of consent form.*) If subjects are minors, mentally infirm, or otherwise not legally competent to consent to participation, how is their assent obtained and from whom is proxy consent obtained? How is it made clear to subjects that they can quit the study at any time?

4. Do subjects risk *any* harm – physical/ psychological/ legal/ social – by participating in the research? Are the risks necessary? What safeguards do you take to minimize the risks?

5. Are subjects deliberately deceived in *any* way? If so, what is the nature of the deception? Is it likely to be significant to subjects? Is there any other way to conduct the research that would not involve deception, and, if so, why have you not chosen that alternative? What explanation for the deception do you give to subjects following their participation?

6. How will participation in this research benefit subjects? If subjects will be 'debriefed' or receive information about the research project following its conclusion, how do you ensure the educational value of the process? (*Include copies of any debriefing or educational materials*)

TERMS AND CONDITIONS FOR APPROVAL IN TERMS OF THE DATA PROTECTION ACT

- Personal data shall only be collected and processed for the specific research purpose.
- The data shall be adequate, relevant and not excessive in relation to the processing purpose.
- All reasonable measures shall be taken to ensure the correctness of personal data
- Personal data shall not be disclosed to third parties and may only be required by Triagon Academy or the Supervisor for verification purposes. All necessary measures shall be implemented to ensure confidentiality and where possible, data shall be anonymized.
- Unless otherwise authorized by the RPEB, the researcher shall obtain the consent from the data subject (respondent) and provide him with the following information: The researcher's identity and habitual residence, the purpose of processing and the recipients to whom personal data may be disclosed. The data subject shall also be informed about his rights to access, rectify, and where applicable erase the data concerning him.

I, the undersigned hereby undertake to abide by the terms and conditions for approval as attached to this application.

I, the undersigned, also give my consent to the Triagon RPEB to process my personal data for the purpose of evaluating my request and other matters related to this application. I also understand that I can request in writing a copy of my personal information. I shall also request rectification, blocking or erasure of such personal data that has not been processed in accordance with the Act.

APPLICANT'S SIGNATURE:

*I hereby declare that I will not start my research on human subjects before approval*

DATE 27.01.2024

TUTOR'S SIGNATURE

*I have reviewed this completed application, and I am satisfied with the adequacy of the proposal*

DATE 30. 01.2024

***To be completed by the Research Project Ethics Board***

We have examined the above proposal and advise

**Acceptance**

**Refusal**

**Conditional Acceptance**

For the following reason/s:

Name/s and Surname/s of RPEB Representative/s:

Signature/s:

Date: