Global Research and Technology Development
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RCC
Research Commissioning Centre

GRTD RESEARCH COMMISSIONING CENTRE

# RCC Research Ethics Framework

Ethical standards for research and impact activities

**Version 1** | October 2026

## About this publication

RCC Research Ethics Framework: Ethical standards for research and impact activities. Version 1, October 2026. Over the next 12 months, the RCC will continue to refine this first iteration of the RCC Research Ethics Framework, drawing on grantees' implementation experiences and wider consultation, so that learning is captured and actioned in line with the RCC's mission to champion good practice.

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## About the GRTD Research Commissioning Centre

The GRTD RCC commissions and manages research for global impact and scalable solutions, working across the full research lifecycle. The RCC is co-led by the International Initiative for Impact Evaluation (3ie) and the University of Birmingham, and a consortium of UK and global partners. For more information, visit: https://www.grtd.fcdo.gov.uk/about-rcc/.

## Disclaimer

The views expressed in this publication are those of the authors and do not necessarily reflect the official policy or positions of the FCDO or its partners.

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# List of abbreviations

| | |
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| **3ie** | International Initiative for Impact Evaluation |
| **AGA** | Accountable Grant Arrangement |
| **AI** | Artificial Intelligence |
| **CoI** | Conflict of Interest |
| **DAS** | Data Access Statement |
| **DFID** | Department for International Development |
| **FAIR** | Findable, Accessible, Interoperable and Reusable |
| **FCAS** | Fragile and Conflict-Affected Settings |
| **FCDO** | Foreign, Commonwealth & Development Office |
| **GDPR** | General Data Protection Regulation |
| **GRTD** | Global Research and Technology Development |
| **HIC** | High-Income Country |
| **IASC** | Inter-Agency Standing Committee |
| **IP** | Intellectual Property |
| **IRB** | Institutional Review Board |
| **LLM** | Large Language Model |
| **LMIC** | Low- and Middle-Income Country |
| **MoU** | Memorandum of Understanding |
| **NIHR** | National Institute for Health and Care Research |
| **RCC** | Research Commissioning Centre |
| **REC** | Research Ethics Committee |
| **UKRI** | UK Research and Innovation |
| **UKRIO** | UK Research Integrity Office |
| **UoB** | University of Birmingham |

# Foreword

The GRTD Research Commissioning Centre (RCC) was established in 2023 to help the UK government's Foreign, Commonwealth & Development Office (FCDO) commission rigorous, equitable and policy-relevant research that responds to global challenges and delivers practical impact. We support FCDO research teams with a responsive vehicle to develop and commission research by providing accelerated access to world-leading academics, streamlined commissioning processes, and research practices underpinned by standards of rigour, equity and ethics.

We believe ethical practice is more than a legal obligation; it is fundamental to the quality, credibility and value of research. This means respecting the rights, dignity and agency of participants and communities; protecting research teams; managing information responsibly; and acting with integrity throughout the research process. These responsibilities are particularly important in the diverse settings where the RCC commissions research and uptake projects. These include low- and middle-income countries (LMICs) and fragile and conflict-affected settings (FCAS), where unequal global power relationships are deeply rooted, and the risk of exclusion or harm may be greater.

Equity is therefore integral to the RCC's understanding of ethical and impactful research. Through our Equity Action Plan, we are working to embed inclusive processes, shared decision-making and increased leadership roles for partners from LMICs and underrepresented groups across the commissioning lifecycle. We see equity not only as a matter of fairness, but also as an ethical necessity. Research is more credible, relevant, trusted, and likely to be used when the people and communities closest to the issues play a meaningful role in shaping it.

This first iteration of our RCC Research Ethics Framework sets out what we expect of the research and impact activities we commission. It translates our commitments into clear principles and practical expectations for designing, reviewing, conducting, sharing, and responsibly using RCC-funded research. The Framework adopts a preventative, survivor-centred approach to safeguarding and duty of care. It complies with applicable laws and sits alongside independent ethics review, the RCC's award-stage due diligence processes, contractual terms, and wider FCDO requirements.

Together, these arrangements help to ensure that the research we commission is conducted responsibly and that emerging ethical and safeguarding concerns are identified, mitigated and addressed throughout the research lifecycle. Compliance with the Framework is a condition of RCC funding. All grantees and research partners are expected to apply its requirements proportionately and promptly raise ethical or safeguarding concerns.

We are sharing this first iteration of the Framework to gather feedback and help us strengthen our approach. Should you wish to share your feedback, please contact the RCC by email at rcc@3ieimpact.org with "RCC Research Ethics Framework" in the subject line.

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# Executive summary

The GRTD Research Commissioning Centre (RCC), co-led by the International Initiative for Impact Evaluation (3ie) and the University of Birmingham (UoB), and a consortium of UK and global partners, commissions and manages research on behalf of the UK government's Foreign, Commonwealth & Development Office (FCDO). This Framework sets out the ethical standards that govern that work and, just as importantly, how those standards are to be put into practice.

It rests on a simple conviction: ethical research is better research. Protecting the people who take part in research, treating partners fairly who carry it out, and being honest about what the evidence can and cannot show are necessary conditions of good science. For the RCC, ethics is also a matter of equity. Much of our work takes place in low- and middle-income countries and in fragile and conflict-affected settings, where the risks of harm, exclusion, and extractive practices are greatest and protections that researchers elsewhere take for granted cannot be assumed.

The Framework also applies to RCC-funded activities that support the responsible use, communication and uptake of existing research. These activities may not constitute new research and may not require formal research ethics committee review. However, they can still create ethical risks: policy engagement may exclude affected communities; dissemination may expose individuals, organisations or communities to harm; events may raise safeguarding or accessibility concerns; and retrospective impact evaluations may involve new data collection or sensitive accounts of policy influence. The Framework therefore governs such activities through ethical screening, safeguarding and data protection requirements, and oversight proportionate to the level of risks of the respective activities.

The Framework is built around nine core principles: respect for persons and communities; maximising benefits and minimising risks; justice and equitable participation; integrity and transparency; accountability; privacy and confidentiality; inclusivity; equitable international research partnership; and safeguarding and the duty to do no harm. This Framework turns each principle into clear expectations, matches the intensity of review to the level of risk, and carefully considers accountability.

In practical terms, the Framework explains how the RCC classifies the risk of a study (Tier 1: research using non-identifiable or public data, and Tier 2: research involving people or identifiable or sensitive information) and its corresponding ethical review requirements. The Framework explains why ethical review should rest first with a committee in the country or countries where the research takes place, and what happens when no such committee is available; what is expected at each stage of the research cycle, from design to the management of data after a study ends; and how the RCC approaches research in fragile settings, equitable partnerships with the Global South, safeguarding, data protection and the responsible use of artificial intelligence.

It is written for everyone involved in RCC-funded research: the applicants and principal investigators who design and lead studies, the partner organisations and field teams who carry them out, the reviewers who assess them and the RCC and FCDO staff managing these processes and overseeing research delivery. Throughout, the word ***must*** signals a binding requirement and the word ***should*** signals strongly expected good practice. The Framework complements, and never lowers, the protections set by host-country law and by the wider FCDO and UK research ethics system. Where any other standard is more protective of participants, that standard prevails.

# Research-cycle ethics checklist

The checklist summarises the ethical principles and expectations across the research cycle, corresponding to Section 6, and is intended as a reference for RCC grantees. Each expectation is worded in line with the main text, where **must** is a binding requirement and **should** is strongly recommended practice.

## Stage 1: Commissioning, planning and design

- ☐ Project risk level and ethics committee review route **must** be confirmed with the RCC
- ☐ Safeguarding and duty-of-care plan **must** be prepared and abide by IASC Six Core Principles and IASC Minimum Operating Standards to provide protection from sexual exploitation and abuse
- ☐ Data management plan **must** be prepared (if applicable)
- ☐ Consent strategy appropriate to the population **must** be prepared (if applicable)
- ☐ Partnership agreement / Memorandum of Understanding (MoU) between research partners **should** be in place (if applicable)
- ☐ Appropriate organisational and downstream partners' due diligence **must** be completed, including sanctions screening, and review of safeguarding, human resources and financial policies
- ☐ Participant selection strategies **should** avoid unjustified exclusion and enable historically marginalised groups with least power to meaningfully inform the research
- ☐ Conflicts of interest **must** be declared to the RCC and ethics review board(s)
- ☐ Ethics approval appropriate to its level of risk **must** be obtained before research begins
- ☐ Required research permits, legal authorisations and site permissions **must** be identified and obtained
- ☐ Intended artificial intelligence (AI) use **must** be declared and justified (if applicable)
- ☐ Budget **should** be allocated for ethics review costs and equitable research practice (including language translation, community engagement, and safeguarding procedures)

## Stage 2: Data collection and analysis

- ☐ Valid, voluntary, comprehensible consent from research participants **must** be obtained and recorded
- ☐ Data **must** only be collected where needed and **must** be handled securely
- ☐ Participation patterns **should** be monitored and data collection methods adapted to remove barriers to research engagement, particularly for historically underrepresented groups

- ☐ The welfare and safety of researchers, field staff, research participants and those involved in research production **must** be protected
- ☐ Documented mechanisms for reporting safeguarding incidents and adverse events **must** be in place, including a named responsible person or focal point
- ☐ All safeguarding incidents **must** be handled with a survivor-centred approach, confidentiality and the safety, security, privacy and the right of due process of all survivors
- ☐ All safeguarding incidents and adverse events **must** be responded to within two working days and **must** be reported immediately to the 3ie Senior Human Resource Manager at safeguardingconcerns@3ieimpact.org
- ☐ AI-assisted analysis **must** be validated and documented (if applicable)
- ☐ Attention **should** be given to researchers' bias, validity of their analysis and reflexivity on their own influence on the people and settings they study

### Stage 3: Reporting, dissemination and use of evidence

- ☐ Findings **must** be reported honestly and in full
- ☐ Anonymisation and disclosure control **must** be applied
- ☐ When personal identification is necessary, it **must** be ethically justified, explicitly consented to and supported by a documented assessment of potential harm
- ☐ Authorship and credit **must** be fairly captured
- ☐ Substantive AI use **must** be disclosed (if applicable; see UK Research and Innovation's (UKRI) policy on use of generative AI in application preparation and assessment)
- ☐ Findings **should** be made accessible to key stakeholders and communities (local language; return of findings)
- ☐ Research outputs **must** comply with good practice in open and responsible science, including applicable FCDO policies, such as the open access policy
- ☐ Data Access Statements **must** be published in research outputs detailing where the data supporting the research results reported can be found and how it can be accessed, subject to confidentiality requirements and applicable data protection considerations

### Stage 4: Monitoring, follow-up and data management

- ☐ Data **must** be retained / shared / archived / destroyed as per the project data management plan and relevant law, including Data Protection Act 2018; Freedom of Information Act 2000); General Data Protection Regulation (EU) 2016/679; The Environmental Information Regulations 2004; FCDO open access policy; and subordinate legislations and guidance and code of practice issued by the Information Commissioner's Office or other UK government departments
- ☐ Safeguarding **must** be monitored and incidents reported

- ☐ Ethics review submissions, correspondence, conditions and decisions **must** be retained for a defined period and available for scrutiny
- ☐ Complaints **must** be followed through and recorded
- ☐ Learning **should** feed into future practice

**Short AI checklist** (where AI is used; see Section 9 and Annex C)

- ☐ AI use **must** be declared at design stage and disclosed in outputs
- ☐ Named researcher **must** be accountable for AI-assisted outputs
- ☐ Personal/sensitive data **must not** be entered into inadequately protected AI tools
- ☐ Bias **must** be considered, and tested where possible, where it affects vulnerable groups
- ☐ Outputs **must** be validated against human judgement

**Note:** RCC applicants and grantees are encouraged to use the 2021 Government Social Research Ethics Checklist alongside this checklist to identify and address relevant ethical considerations.

# 1. Introduction and context

The RCC was established to commission high-quality, equitable and impactful research across a wide range of disciplines and geographies, including complex and fragile settings where rigorous evidence is often scarcest and most needed. A defining feature of its mandate is to widen participation in research: to bring in a broader and more diverse range of partners, many of them based in low- and middle-income countries, and working in contexts with under-funded and under-resourced research ethics infrastructure (Tapscott and Machón, 2025). With this ambition comes the responsibility to ensure that where research reaches new partners and new communities, the protections that surround it are robustly designed and implemented.

Ethical oversight is not a formality. Done well, it protects the people who take part in research from harm and disrespect, it shores up the credibility of the evidence the RCC commissions and publishes, and it keeps partnerships equitable rather than extractive. Done poorly, it leaves participants exposed, partners sidelined, and findings open to doubt. For the RCC, ethics and quality are inseparable: a study that mistreats people or the partners it depends on is not an acceptable study, regardless of its methods.

Challenges in how procedural ethical commitments are implemented in practice are well-documented in recent literature (for example, Guillemin and Gillam, 2004; Cascant Sempere, Aliyu and Bollaert, 2022; Powell et al., 2023). A global review of the AI-ethics guidelines published in recent years found convergence on the values they espouse, but far less agreement on how those values are to be put into practice (Jobin, Ienca and Vayena, 2019). The mechanisms of accountability (such as monitoring, independent oversight, and consequences when standards are not met) were among the elements most consistently left unspecified.

The same pattern is familiar in research ethics. Organisations adopt principle-based statements far more readily than they build the review processes, documentation and follow-through that make those statements real (Tapscott and Machón, 2025). This Framework also recognises that relying solely on institutional ethics reviews or pre-approved research protocols is insufficient unless supplemented by an ongoing and continuous critical reflection of the power dynamics and ethical dilemmas throughout the research process (Guillemin and Gillam, 2004). Accordingly, this Framework is deliberately designed so that principles are paired with concrete expectations. This will be further developed in the next iteration of the Framework and the associated RCC processes that support its application.

The Framework does not stand alone, and it does not displace existing obligations. It sits within, and draws upon, an established body of UK and international guidance. This includes: FCDO's own ethical guidance for research, evaluation and monitoring (Department for International Development (DFID), 2019), Defining the Agenda: Key Lessons for Funders and Commissioners of Ethical Research in Fragile and Conflict-Affected Contexts and accompanying reviewers guide (UK Research and Innovation (UKRI) and UNICEF, 2021a, 2021b), the guidance on research ethics support and review developed by the UK Research Integrity Office and the Association of Research Managers and Administrators (Carpenter et al., 2020), and the Concordat to Support Research Integrity (Universities UK, 2025).

The Framework also sits alongside the RCC's award-stage due diligence and contractual arrangements. Prior to funding, the RCC undertakes proportionate due diligence of prospective grantees, including consideration of safeguarding, governance, financial management, sanctions compliance and organisational capacity. Funding agreements establish binding obligations relating to safeguarding, research governance, data protection, reporting, audit, fraud prevention

and other compliance requirements. Grantees are responsible for ensuring that relevant obligations are appropriately reflected in their arrangements with downstream partners. These mechanisms provide contractual and compliance assurances, while this Framework sets out the ethical principles and standards that govern the design, conduct and use of RCC-funded research and related impact activities.

The Framework assumes the requirements of host-country law, of host-country research ethics committees, and of UK and host-country data protection law. Its purpose is to bring ethics obligations together into a single, coherent and usable account tailored to the RCC's portfolio. Where this Framework and another applicable standard differ, the more protective standard always applies.

# 2. Purpose and scope

## 2.1 Purpose

The purpose of this Framework is to provide a clear, proportionate and enforceable ethical standard for all RCC-funded research, research translation and engagement, dissemination and impact-related activities. It states the principles that govern that work, explains what those principles require across the life of a study, sets out how studies are reviewed in proportion to their risk, describes how compliance is assured and how concerns are raised and addressed. It is intended to be read and used by applicants as they design studies; by grantees, partners and field teams as they carry them out; by reviewers as they assess them; and by RCC and FCDO staff who are overseeing RCC-funded research.

## 2.2 Scope and application

This Framework applies to all research commissioned wholly or in part by the RCC, however it is commissioned, through open calls, partnerships or direct arrangements. It applies to every organisation involved in delivering that work, including partners, suppliers and subcontractors, and to every stage of the process, from the first design decisions through to the management of data and communication of findings after a study has ended.

Its requirements are engaged most strongly wherever research involves people and their information directly. This includes the collection of primary data from participants; the use of secondary, administrative or digital data that contains identifiable or sensitive information; research involving children or other people whose circumstances may limit their ability to protect their own interests; biomedical and health-related research; and any research conducted in emergencies or in fragile and conflict-affected settings. Studies of this kind attract closer ethical review and scrutiny, to ensure a participant-centred approach that prioritises the safety, dignity, agency and wellbeing of participants and seeks to minimise the risk of harm throughout the research process, as explained in Section 4.

The Framework governs the ethical conduct of research, including the use of artificial intelligence (AI) as a *tool* in research, for example, to screen literature, code qualitative data, or assist analysis (see Section 9). It does not govern AI as a *subject* of study; research about AI is treated like any other research topic and is held to the same standards as the rest of this document.

This Framework also applies to RCC-commissioned projects that support impact through the responsible translation, communication, uptake or sustained use of existing FCDO-funded research. While these projects may not involve new research, use of identifiable or sensitive data, or other risks identified in Section 4, this does not remove ethical responsibility. Impact activities must still comply with the Framework's core ethical principles (see Section 3) and uptake- and impact-specific ethical and safeguarding considerations (Section 11).

## 2.3 How to use this Framework

The Framework is designed to be read in order, but also to be consulted on a targeted basis throughout the project cycle. The nine principles in Section 3 establish what RCC-commissioned research and impact activities are expected to uphold and why. The model of proportionate review in Section 4 explains how much scrutiny a given study needs, and the account of governance in Section 5 explains who reviews what, beginning with ethics committees in the country where the research takes place. The heart of the document is Section 6, which follows

the research cycle stage by stage and outlines what is expected at each stage. Additional sections then address relevant themes for the RCC's work: research in fragile settings (Section 7), equitable partnerships (Section 8), the use of AI (Section 9), safeguarding and data protection (Section 10), and ethics and safeguarding in research uptake and impact activities (Section 11). Section 12 explains how the Framework is upheld in practice.

Tools to support self-reflection or compliance are provided in annexes where relevant. A glossary of key terms is also provided in Annex D.

### ⓘ How to read *must, should* and *may*

The strength of the expectations in this Framework is signalled by the wording:

- ***must*** reflects a binding requirement and departure from it puts RCC funding at risk;
- ***should*** marks strongly expected good practice, from which a partner may depart only where there is good reason, recorded honestly and proportionate to the circumstances; and
- ***may*** marks something that is permitted or suggested but not required.

These expectations are proportionate throughout: what is asked of a particular study depends on its risk and its context.

# 3. Core ethical principles

The RCC's ethics approach is anchored in nine core ethical principles, synthesised from internationally recognised standards and adapted to the realities of the RCC's portfolio. The first eight are drawn from an internal RCC discussion paper on research ethics, which in turn distils a long lineage of national and international guidance, including: the Belmont Report (National Commission for the Protection of Human Subjects of Biomedical and Behavioral Research, 1979), the European Code of Conduct for Research Integrity (ALLEA – All European Academies, 2023), the Tri-Council Policy Statement on the ethical conduct of research involving humans (Canadian Institutes of Health Research, Natural Sciences and Engineering Research Council of Canada, and Social Sciences and Humanities Research Council of Canada, 2022), the Concordat to Support Research Integrity (Universities UK, 2025), and the guidance on research ethics support and review issued by the UK Research Integrity Office (UKRIO) and the Association of Research Managers and Administrators (ARMA) (Carpenter et al., 2020). The ninth, safeguarding and the duty to do no harm, is stated separately and deliberately, because the safeguarding obligations that arise in development research reach beyond what a conventional analysis of research risks and benefits is designed to capture (UK Collaborative on Development Research (UKCDR), 2020).

These principles are the standards against which the design and conduct of a study are judged throughout its life, and they are interdependent. They will sometimes pull in different directions: the duty to include a marginalised group, for instance, may sit uneasily with the duty to protect people whose circumstances make participation risky. Where that happens, the tension should be reasoned openly, the judgment recorded, and, for higher-risk studies, tested at ethical review rather than resolved by the research team alone.

## 3.1 Respect for persons and communities

Respect for persons begins with the recognition that people are entitled to make their own decisions about whether and how to take part in research, and that those whose autonomy is constrained, for example, by illness, poverty, age, disability or insecurity, are owed additional protection rather than less (National Commission for the Protection of Human Subjects of Biomedical and Behavioral Research, 1979; Canadian Institutes of Health Research, Natural Sciences and Engineering Research Council of Canada, and Social Sciences and Humanities Research Council of Canada, 2022). In the contexts where the RCC works, consent must be informed, voluntary and genuinely understood. Participants must be given a truthful account of what the research involves, in a language and format they understand, and must be free to decline or to withdraw at any point without penalty or loss of any benefit to which they are otherwise entitled. Where participants cannot themselves consent, appropriate proxy consent must be sought, with the person's own assent respected as far as they are able to give it (Council for International Organizations of Medical Sciences (CIOMS), 2016).

Respect also extends beyond the individual. Much RCC-commissioned research takes place in settings where decisions are made collectively and where a study may affect a whole community, not only those who answer its questions. Researchers must respect relevant cultural norms and, where appropriate, seek agreement at community level alongside, and never instead of, the consent of individuals. More broadly, people affected by research should have a meaningful voice in decisions that concern them, from the framing of questions to the way findings are shared.

### 3.2 Maximising benefits and minimising risks

Researchers are expected not only to avoid harming the people who take part in their research but to take active steps to protect and promote their wellbeing, maximising the benefits of the work while minimising its risks (National Commission for the Protection of Human Subjects of Biomedical and Behavioral Research, 1979; Friesen et al., 2017). This calls for honest, proportionate judgement rather than mechanical risk-scoring. Before data collection begins, a study must weigh the harms it could foreseeably cause (e.g. physical, psychological, social, economic or legal) and consider these against the benefits it can realistically be expected to deliver. That assessment must be revisited whenever circumstances change. Foreseeable harms must be mitigated. Any residual risk must be clearly justified by a realistic and proportionate benefit to participants or the wider at-risk population they represent, wherever possible, and understood and accepted by those who bear them.

What counts as a benefit or a harm is not for researchers to determine alone. A line of questioning that seems innocuous to an outside team may carry real social risk for the person answering it, and a benefit that matters to a funder may mean little to the community it is meant to serve. Risk assessment and mitigation must therefore be participant- and survivor-centred, placing safety, dignity, agency and lived experience at the centre of decisions about benefits and harms.

### 3.3 Justice and equitable participation

Justice requires that the benefits and burdens of research be shared fairly, and that the people recruited into a study are not recruited simply because they happen to be easy to reach (National Commission for the Protection of Human Subjects of Biomedical and Behavioral Research, 1979; Canadian Institutes of Health Research, Natural Sciences and Engineering Research Council of Canada, and Social Sciences and Humanities Research Council of Canada, 2022). The criteria by which participants are included or excluded must be defensible and recorded, and they must not add further burden onto groups that may already carry more than their share. People whose capacity to consent is diminished should be involved only where the research question genuinely cannot be answered any other way, where safeguards are in place, and where there is a real prospect of benefit to the participants or the subgroup they represent.

Equity goes further than fair procedure. It asks who ultimately gains from research and who is left out, and it directs particular attention to underserved groups whose needs are poorly served by existing evidence. RCC-commissioned research and impact activities should be designed so that their benefits reach such groups rather than passing them by.

### 3.4 Integrity and transparency

The credibility of research depends on transparency about how a study is funded and conducted, and about what it can and cannot show (ALLEA – All European Academies, 2023; Universities UK, 2025). Researchers must give an open and truthful account of their objectives, methods, funding sources, conflicts of interest and study limitations, to participants and to the wider public alike. The data and analysis on which findings rest, including any assistance from AI tools (see Section 9), must be documented well enough to allow others to scrutinise the work and, where possible, to reproduce it. The RCC treats fabrication, falsification and the selective reporting of results that flatter a preferred conclusion as serious misconduct. Findings, recommendations and claims of influence must be accurate, proportionate, context-sensitive and

traceable to the underlying evidence, with limitations, uncertainty and contested interpretations clearly acknowledged.

RCC grantees should also consider the ethics of influence itself, including whose voices shape policy and programme engagement, and whether affected communities and local partners can meaningfully inform how evidence is interpreted and used. Particularly in politically sensitive, contested or fragile settings, grantees must consider whether dissemination or engagement could create legal, reputational, security or social risks for participants, researchers, partners, policymakers or communities, and mitigate these risks (DFID, 2019; UKRI and UNICEF, 2021a; Jensen et al., 2025).

These principles extend to the stewardship of research funds: the resources entrusted to a study must be used and accounted for truthfully, and their misuse, misappropriation or misreporting is as serious a breach of integrity as the misrepresentation of findings (see Section 12). All RCC research must follow FCDO's eligible cost guidance.

### 3.5 Accountability

Accountability means that individuals and organisations own their part of the research process and can be held answerable for it, from the earliest design decisions through to publication and beyond (ALLEA – All European Academies, 2023; Universities UK, 2025). For every funded activity, the lines of responsibility for ethical conduct must be well-defined and documented, so that it is clear who is responsible for protecting participants, securing approvals, or responding when something goes wrong. Where minimum standards are not met, partners are expected to answer for shortcomings, and research should be subject to monitoring and independent oversight proportionate to its risk.

This principle is given particular weight because it is the one most often missing in practice. Reviews of ethics guidance across fields find the same recurring gap: accountability, including monitoring, oversight and real consequences, is endorsed in words far more readily than it is delivered in action (Jobin, Ienca and Vayena, 2019). The RCC, therefore, treats the machinery of accountability as part of what it means to take these principles seriously.

### 3.6 Privacy and confidentiality

People who share information about themselves for the purposes of research retain an interest in how that information is used, and researchers take on a corresponding duty to protect it (Canadian Institutes of Health Research, Natural Sciences and Engineering Research Council of Canada, and Social Sciences and Humanities Research Council of Canada, 2022; ALLEA – All European Academies, 2023). That duty is strongest for personal data and for information that could identify a participant, whether directly or by inference.

Privacy must be built into the design of a study from the outset: only the data genuinely needed should be collected, and it must be handled securely at every stage of its life. Data collection with research participants (for example, interviews, focus group discussions or enumerator-administered surveys) should take place in a safe and secure location that does not draw unnecessary attention or raise suspicion, and where participants cannot be overheard by others (World Health Organization (WHO), 2007). Researchers must anonymise or pseudonymise personal data at the earliest practical stage, limit access to identifiable information, and consider risks of re-identification, particularly where datasets contain sensitive information or involve small or vulnerable populations. Researchers must also be clear about whether data can be fully anonymised and communicate any limitations to participants (Information Commissioner's Office

(ICO), 2026). Where data crosses borders, as it often does in international research, the transfer must rest on a lawful basis under the applicable UK and host-country law (see Section 10.2). So far as is compatible with the integrity of the research, participants should keep meaningful control over how information about them is collected, used and shared.

### 3.7 Inclusivity

Research should reflect and serve the diversity of the populations it concerns (Canadian Institutes of Health Research, Natural Sciences and Engineering Research Council of Canada, and Social Sciences and Humanities Research Council of Canada, 2022). People must not be excluded from RCC-funded research on the basis of personal characteristics, such as culture, language, religion, race, disability, sexual orientation, ethnicity, gender or age, unless there is a valid, documented reason for doing so.

Inclusivity, though, is more than the absence of exclusion. Studies should be designed to engage with gender, age, disability and other dimensions of inequality across the project delivery and beyond, from the questions they ask to the way their findings are communicated. Researchers should engage the communities and stakeholders affected by their work early and throughout, rather than treating them as a source of data to be approached once and then left behind. RCC grantees must develop and ensure a systematic approach to equality, diversity and inclusion in all projects, in line with the UK Equality Act 2010 (see for example Guidance for equality, diversity and inclusion – UKRI).

### 3.8 Equitable international research partnership

Research that involves research institutions from different countries takes place against a backdrop of real and persistent inequality, including over who sets the agenda and controls the funding, whose names appear on the outputs, and whose knowledge is treated as authoritative (ESSENCE and UKCDR, 2022; Horn et al., 2022, 2023; Aboderin et al., 2023; Charter Coalition, 2023). The RCC expects its funded collaborations to confront these imbalances rather than reproduce them. Before research begins, partners should agree in writing how roles, decision-making, budgets, data and authorship will be shared, so that fairness is designed in rather than negotiated after the fact. Partnership agreements should also clarify upfront who owns, controls, accesses, analyses, shares and benefits from research data, particularly ensuring in-country partners are not confined to data-production roles but are supported to use data for analysis, publication, institutional strengthening and community benefit (Marais et al., 2013; Council on Health Research for Development (COHRED), 2018; ESSENCE and UKCDR, 2022; Evertsz, Bull and Pratt, 2023; Association of Commonwealth Universities (ACU), 2023).

Collaborations must not be extractive: partners in the countries where research takes place must have a substantive role in shaping and interpreting the work, not merely in collecting its data. Beyond these minimums, partners should actively value non-Western and Indigenous knowledge, use host-country languages, and support national ownership and strengthening of local research capacity (Horn et al., 2022; Charter Coalition, 2023; Swiss Alliance for Global Research Partnerships, 2025). Because equity in partnership is a matter of continuous practice rather than a single commitment, it is given fuller treatment in Section 8, with a structured set of reflection questions in Annex B.

This area of the RCC Research Ethics Framework also closely interacts with the RCC's approaches and practices outlined in the RCC Equity Action Plan.

### 3.9 Safeguarding and the duty to do no harm

Beyond the risks that arise from a study's design, researchers owe an active duty of care to everyone engaged by their work, including participants, communities, and the research staff themselves. Safeguarding is the prevention of, and response to, harm such as sexual exploitation, abuse and harassment, bullying, and physical or psychological violence (UKCDR, 2020). Safeguarding measures must be planned before fieldwork begins rather than improvised once concerns arise. They must depend on confidential, survivor-centred channels that let anyone report harm safely and see it addressed and extend in full to the enumerators and locally engaged fieldworkers who usually carry the greatest exposure and the least protection. Organisations working with the RCC are expected to carefully manage their safeguarding policies and approaches, and this is reflected in the Due Diligence process and RCC reporting.

This principle is stated separately from "maximising benefits and minimising risks" (Section 3.2) because it does different work. Where beneficence governs the balance of risk and benefit within the research itself, safeguarding addresses the proactive, interpersonal and institutional prevention of abuse and harm that can arise around a study regardless of how well its methods are designed. The practical expectations that follow from it are set out in Section 10.

# 4. Proportionate ethics review

Not every study carries the same risk, and not every study needs the same depth of scrutiny. The RCC therefore expects research ethics review in proportion to the risk it presents, following the risk-based approach set out in the guidance on research ethics support and review developed by the UK Research Integrity Office and the Association of Research Managers and Administrators (Carpenter et al., 2020). Proportionality keeps oversight in line with project risks, allowing the same Framework to govern a desk-based synthesis of published statistics and a survey of survivors of violence without treating them as if they were the same. The level of risk an activity presents determines both how it is reviewed and how demanding the expectations placed upon it become.

The RCC distinguishes two broad levels of review, which this Framework calls **Tier 1** and **Tier 2**.

**Tier 1** covers low-risk research, for example, the analysis of secondary data that cannot identify anyone, or of genuinely public information, where there is no realistic prospect of harm. Such work may proceed on the basis of a self-assessment by the principal investigator.

**Tier 2** covers research that engages people and their information more directly and requires full review by a research ethics committee. It is triggered whenever a study involves the collection of primary data from participants, regardless of topic, or secondary, administrative or digital data containing identifiable or sensitive information.

Committee review is itself applied proportionately. More routine submissions, and minor amendments to approved studies, may be handled through an expedited review, while the most sensitive studies, including those involving children or other people in vulnerable circumstances; highly sensitive data, such as biomedical information; or work carried out in emergencies or fragile and conflict-affected settings, require fuller scrutiny. Uptake and impact activities that do not involve new data generation or re-analysis are not exempt from ethics review considerations, but the same principle of proportionality applies.

Responsibility for placing a study at the right level begins with the applicant, subject to review by the RCC. **Applicants** should use the self-assessment checklist in Annex A to identify ethics and safeguarding risks, which they will be asked to reflect on in their application.

For **awarded projects**, the tier classification will be confirmed at award stage and built into Deliverables and Disbursement Schedules with grantees. Classification, however, is not a one-off judgement: if the scope, population, data or context of a study changes materially as it proceeds, it must be reclassified and, where necessary, reviewed afresh before the changed work goes ahead.

Appropriate ethics review and approval must be maintained throughout the complete lifecycle of the project. Where approval is time-limited, it must be renewed or extended before expiry if activities within its scope are continuing.

**Important**

Grantees should use the ethics and safeguarding self-assessment screen in Annex A to support their proposed approach to ethics review in the context of their project. The purpose of the screen is to identify potential risks associated with the project, and the appropriate and proportionate response to them. Applicants and grantees should clearly specify their proposed approach to ethics review at submission stage and ensure that they adequately plan for the review process in their timelines and budgets.

**Without exception, data collection involving human participants, or the processing of identifiable personal data for research, must not begin until the appropriate ethics review has been completed, any required approval has been obtained, and applicable conditions have been met.**

# 5. Governance of ethics review

Sound ethical review depends not only on good standards but on a clear understanding of who is responsible for what. Primary responsibility rests with the **principal investigator**, who is accountable for the ethical conduct of the study, for classifying its risk, and for securing the approvals it needs before any work begins. Where research is delivered through a partnership or consortium, **partner institutions** share that responsibility for their own part of the work and remain bound by their own institutional requirements. For such multi-partner projects, the **lead grantee** remains accountable to the RCC for the ethical governance of the whole project and must ensure that relevant ethics and safeguarding requirements apply throughout the delivery chain.

**Applicants and grantees** are also primarily responsible for identifying and demonstrating the ethics approval routes, government permissions and other requirements applicable in each country and research site. The RCC verifies the credibility and appropriateness of the ethics review routes on a proportionate basis.

## 5.1 Host-country review first

The RCC's strong preference is that **ethical review should rest first with a competent committee in the country or countries where the research is carried out**. Such committees are best placed to understand what a study means for the people it involves, and reviewing locally is itself a matter of equity: it treats host-country institutions as the authorities they are, rather than as junior partners to a review conducted elsewhere. For this reason, research requiring committee review must seek approval from a competent host-country committee wherever it is possible to do so, regardless of whether the same study has already been approved in a high-income setting.

Recognising that the cost of independent review can be a barrier, the RCC may meet the direct cost of host-country review, provided that review remains independent of the organisations involved in the research. **Research team members must not participate in or influence ethics committee review processes**, ensuring independent and objective appraisal.

Legal compliance runs alongside ethical approval. RCC-commissioned research must comply with the law of every country in which it is carried out, which includes obtaining any research permits, registrations or sector-specific authorisations that local law requires. Obtaining these authorisations is the responsibility of the research team and, like ethical approval, they must be in place before the work they govern begins.

Rules that govern employment, taxation and the cross-border movement of data and samples must also be adhered to in all research settings. Where local law and this Framework differ, researchers must comply with both; the Framework sets a floor that local law may raise but cannot lower.

**How other UK funders approach review of international research**

The RCC's position is consistent with that of comparable UK funders. **UKRI** requires research conducted outside the UK to be approved by an independent ethics committee in both the UK and the host country, while acknowledging that approaches to ethics differ across cultures (Economic and Social Research Council (ESRC), 2025a). **Wellcome Trust** requires ethical approval in every country where research is conducted and allows the direct cost of independent review to be charged to a grant (Wellcome Trust, 2025). Other funders that support global health research, such as **NIHR**, take a similar approach, expecting ethical review in the relevant countries to a standard no less stringent than UK requirements. **FCDO**'s guidance expects alignment with its principles to be assured by submitting protocols to the researchers' institutional review board or research ethics committee and to the relevant regulatory authority in the country where the research takes place (DFID, 2019).

### 5.2 When no functional local committee is available

The RCC works in settings where an independent ethics committee may not exist or may be unable to function effectively. Where that is the case, the route of review depends on how the research is organised. Where a study is carried out in partnership with a UK or other-country institution that holds a well-developed ethics committee, that committee must review the work, must take account of local cultural norms and legal frameworks, and should seek documented input from local experts and community representatives so that the review is not conducted in ignorance of the context it concerns. Where, instead, a study is led solely by an institution in a country with no functional committee able to review its Tier 2 work, grantees should raise this with the RCC as early as possible to discuss a viable approach.

# 6. Ethics across the research cycle

This section outlines how to put the principles set out in this Framework into practice across the four stages of the research cycle: planning and design; data collection and analysis; reporting and use; and monitoring, follow-up and data management. The cross-cutting concerns that run through the whole research process are explicitly noted here where they are most directly relevant and treated more fully in the sections that follow. These include safeguarding, data protection, the particular demands of fragile settings, the fairness of partnerships and the use of AI, as well as justice, equitable participation and inclusivity. The grantee-facing checklist at the start of this Framework restates these expectations in a form that can be applied in individual studies.

## 6.1 Stage 1: Commissioning, planning and design

The standard of a study's ethics is largely established before any data is collected. The central expectation at design stage is that ethics is included as a key component from the outset. One of the first considerations should be determining whether the study is useful and necessary and justifies any associated risk or burden in carrying it out. Participant selection and engagement design should also avoid unjustified exclusion and disproportionate burden on various social groups and enable historically marginalised groups with least power to meaningfully inform the research and benefit from its results.

A study must be classified by its level of risk (**Tier 1** or **Tier 2**) and its corresponding ethics review completed (see Section 4) before fieldwork begins. The core plans that protect participants and partners must be prepared at the same time. These include a proportionate assessment of risks and benefits, a safeguarding and duty-of-care plan, a data management plan, and a consent strategy suited to the people the research will involve. Where the work is delivered in partnership, the partners should agree in writing, before research begins, how roles, decision-making, budgets, data and authorship will be shared (see Section 8).

Conflicts of interest (CoI) must be declared to the RCC (see the RCC CoI policy and template) and ethics review board(s). Additionally, the necessary permissions to work at each site must be obtained before activity begins. Any intended use of AI tools must be declared and justified (see Section 9).

Finally, budgets should include costs for ethical and equitable research, including independent ethics review, translation, community engagement and safeguarding.

*Some questions to consider asking here are:*

- *What is the worst harm this study could plausibly cause, and who would bear it?*
- *Is the benefit of the study proportionate to the cost, burdens and risks?*
- *Is a host-country ethics committee available to review it, and if not, what is the review route?*
- *Where people in vulnerable circumstances are involved, is their inclusion genuinely necessary?*
- *Are participant selection and engagement inclusive and fair, particularly for groups with the least power or greatest barriers to participation?*

- *Have the voices of groups with the least power and highest vulnerability been explicitly considered in the research design?*
- *Does the study really need every item of data it proposes to collect?*

**In practice: designing consent for a low-literacy, minority-language community**

A study plans to interview women in a rural area where many participants cannot read and where the main local language differs from the national one used in the original protocol. Designing consent ethically here is more nuanced than translating a form. The team arranges oral consent supported by a plain-language script in the local language, validated by back-translation; builds in simple comprehension checks so that agreement reflects genuine understanding; secures community-level agreement from local leaders alongside each woman's individual consent; and documents how withdrawal can be requested at any time. This should be planned at the design stage and budgeted for and should not be improvised once research is underway.

### 6.2 Stage 2: Data collection and analysis

Once data collection begins, the protections outlined at the design stage must be delivered in practice. Consent must be obtained and recorded, with particular care where participants' autonomy is constrained. Data must be collected and managed in accordance with the approved data management plan, minimised, and handled securely from the moment it is collected (see Section 10.2). Data collection processes must protect participants' privacy and confidentiality, and data retained must be anonymised or pseudonymised as early as practicable. The welfare and safety of research participants, researchers and field staff must be protected, and there must be confidential channels through which safeguarding incidents and adverse events can be reported and acted upon (see Section 10).

Where AI is used to help analyse data, its outputs must be validated against human judgement and documented; researchers must not rest substantive findings on machine outputs they have not checked (see Section 9). Throughout, researchers should remain alert to bias, threats to the validity of their analysis, and their own influence on the people and settings they study. Additionally, researchers should monitor who is participating, excluded, burdened or placed at greater risk during data collection, and adapt methods to remove barriers for participation in the research.

*Questions to consider at delivery stage include:*

- *Is consent genuinely informed, revocable at any time, and continuously monitored?*
- *Does anyone face greater risk simply by taking part?*
- *Are there adequate procedures for mitigating and responding to safeguarding incidents and adverse events?*
- *Is data being stored and moved securely and lawfully?*

- *Where AI is contributing to some of the work, has that work been checked?*
- *Are participation patterns and emerging findings being reviewed and methods adapted to prevent exclusion, unequal burdens or overlooked differences?*

### 6.3 Stage 3: Reporting, dissemination and use of evidence

How research is reported carries its own ethical weight. Findings must be reported honestly and in full, without fabrication, falsification or the suppression of inconvenient results. Outputs must be prepared so that participants and communities cannot be re-identified or exposed to risk, applying anonymisation and disclosure control appropriate to the sensitivity of the material. Credit must be shared fairly: everyone who made a substantive contribution, including partners in the countries where the research took place, should be recognised in authorship (see Section 8).

Any material use of AI in producing the analysis or the outputs must be disclosed. Findings should be made genuinely accessible to the communities and stakeholders they concern, in local languages where appropriate, and including the return of findings to those who took part, rather than only to distant audiences. Research outputs must comply with applicable FCDO open access policy, ensuring that findings are freely accessible.

Before engaging stakeholders for evidence uptake activities, researchers should consider who may benefit or be harmed, whether communication is accurate and proportionate to the evidence, and whether affected groups can meaningfully contribute to interpretation and use of the research findings. Researchers should also identify and mitigate any safeguarding, reputational, political, and security risks that may affect stakeholders involved in the evidence uptake activities (see Section 11). Reporting dissemination and uptake should also represent diverse groups fairly, make findings available to those concerned, and enable historically marginalised groups to inform their interpretation and use.

*Before publication, the following key questions should be considered:*

- *Are research findings presented transparently and accurately?*
- *Could any individual or community be identified or harmed by an output?*
- *Is credit allocated fairly across the research partnership?*
- *Has any use of AI been appropriately disclosed?*
- *How will the findings reach the people they are actually about?*
- *Do outputs fairly represent diverse groups, and will they reach historically marginalised groups in accessible form?*

### 6.4 Stage 4: Monitoring, follow-up and data management

A study's ethical obligations continue beyond the end of the research production. Data must be retained, shared, archived or destroyed in line with the data management plan, applicable law and FCDO open access policy, following the principle that data should be findable, accessible, interoperable and reusable so far as that is compatible with protecting participants (Wilkinson et al., 2016). Key project documents, including ethics approval records, must be securely retained for a defined period and made available for scrutiny as needed.

Safeguarding must continue to be monitored after fieldwork ends, and the commitments made to participants and communities during the study, including any promise to share results, must be honoured. Complaints and grievances must be followed through and recorded, and partners should reflect on what the study taught them about ethical and equitable practice and carry that learning into future work. Follow-up should also assess whether benefits and unintended burdens of the research have been fairly distributed and address outstanding barriers or harms.

*The closing questions ensure that ethical standards are upheld beyond the life of the study:*

- *Is the retention of data lawful, secure and time-limited?*
- *Have the commitments made to participants been kept?*
- *Have diverse groups benefited equitably from the research?*
- *Do any unaddressed harms require further action?*
- *What lessons from the study should be carried forward to future work?*

## 7. Research in fragile and conflict-affected settings

Where RCC-commissioned projects take place in fragile, conflict-affected and emergency settings, the stakes of ethical judgements are heightened. Risks to participants and researchers are higher, the safeguards available are often weaker, and the information gathered is more sensitive. For this reason, research in such settings always requires full ethics committee review (see Section 4), and the expectations set out elsewhere in this Framework apply here particularly strongly.

Research and uptake activities in these contexts must be conflict-sensitive: researchers must consider how their work could affect, and be affected by, the dynamics of insecurity around it, taking care that the simple act of asking questions does not expose people to reprisal or deepen local tensions. A security risk assessment covering participants, communities and field staff must be prepared and kept current as the situation changes. Grantees must promptly report emerging or realised ethical and safeguarding risks and engage in adaptive mitigation.

Where data is gathered remotely or through third parties (a common response to access constraints), the lead institution's ethical responsibilities remain in force: subcontracted enumerators must be trained, supervised and protected to the same standard as the institution's own staff, and held to the same codes of conduct. The welfare and psychological wellbeing of researchers and enumerators, who carry much of the risk burden personally, should also be actively supported, with referral pathways available to those who need them (UKCDR, 2020).

Participant consent demands special care where insecurity, displacement or dependence on aid may compromise how freely it is given. Caution should be applied where formal agreement is obtained but there are concerns it is not genuinely voluntary. It is important to clarify to potential research participants that they can decline to participate in the study or withdraw their consent at any time without providing any reason and without any consequences to their access to support, entitlements, opportunities or other benefits to which they are otherwise entitled.

The security of data collection and storage must be strengthened to match the environment, because in some settings the mere fact of having taken part, or of being identifiable in a dataset, can place a person in danger. There must be procedures to anonymise personal data as soon as possible and ensure data collectors have limited data with them or on their devices. Furthermore, attention must be paid to data storage locations in relation to security, data sovereignty and prevention from data system breaches (UKRI and UNICEF, 2021b).

### In practice: remote data collection in an insecure region

In cases where insecurity prevents a research team from travelling to the study area, data may be collected by locally based enumerators working through a subcontractor. The lead team remains responsible for what happens in the field. It ensures enumerators are trained in consent and safeguarding and are covered by the same code of conduct as core staff; it assesses and mitigates the risks the enumerators themselves face; it adapts consent so that participants understand they may decline without losing access to any assistance they receive; and it stores data so that no individual can be identified from it, recognising that a leaked list of respondents could have more severe consequences than in other settings. The necessity of remote collection does not transfer ethical responsibility away from the lead institution.

# 8. Equitable international research partnerships

Ethical review, however rigorous, was not designed to address one of the defining features of international research: the imbalance of power between partners across countries, particularly between institutions in high-income countries (HICs) and low- and middle-income countries (LMICs) (Cascant Sempere, Aliyu and Bollaert, 2022; Powell et al., 2023). A study might clear all the procedural requirements and still rest on an arrangement in which the agenda, budget, data and credit flow in one direction. The RCC therefore treats equitable partnership as an ethical requirement in its own right, and a core component of applications and decision-making. It supplements ethics review requirements with an explicit RCC Equity Action Plan, so that the collaborations it funds counter rather than reproduce these asymmetries (ESSENCE and UKCDR, 2022; Aboderin et al., 2023; Charter Coalition, 2023).

Equity in partnership is more than a one-off act, but a set of practices that run through the life of a collaboration. Partners must jointly agree roles, decision rights, budgets, data arrangements, authorship and routes for raising concerns before work begins. Partners should co-create the research questions and define success together rather than handing a fixed design to partners. They should similarly share decision rights, budgets and authorship fairly; take seriously the knowledge, languages and theories of the places where research is done; recover the full eligible costs borne by all partners, including the indirect ones; conduct due diligence in both directions rather than only from HICs to LMICs; respect local ethics and regulatory authority; agree on data ownership, access, use and publication rights in line with the funding agreements; invest in mutual capacity-strengthening; safeguard everyone involved; and monitor the health of the partnership over time (COHRED, 2018; Swiss Commission for Research Partnerships with Developing Countries (KFPE), 2018; TRUST, 2018; Shih, Gaunt and Östlund, 2020; Charter Coalition, 2023; Glasgow Centre for International Development, 2025; Swiss Alliance for Global Research Partnerships, 2025).

Because these are matters of honest reflection rather than box-ticking, the RCC asks grantees working with partners to engage with the structured set of partnership questions in Annex B. These questions are intended as an invitation to reflect on what has been achieved or planned within real constraints, and to be candid about the limitations that remain. Partnerships should be monitored over time against indicators of fairness that the partners agree between themselves, with agreed channels for raising and resolving concerns (Afsana et al., 2009; Swiss Alliance for Global Research Partnerships, 2025).

# 9. The ethical use of AI in research

Artificial Intelligence (AI) is increasingly woven into the practice of research. Large language models (LLMs) may help screen literature and draft text or automate systems code and classify qualitative data; machine-learning models support prediction and analysis, while AI-assisted tools accelerate evidence synthesis. Used well, these tools extend what researchers can do. But they also introduce risks that conventional research ethics frameworks were not designed to address: algorithms can encode and amplify bias; sensitive data can leak through third-party services; the workings of a model can be opaque even to those who use it; and machine-generated output can undermine the validity and reproducibility on which credible research depends (United Nations Educational, Scientific and Cultural Organization (UNESCO), 2021).

This section governs AI used as a *tool* in research. It does not introduce a separate ethics for AI; the same nine principles from Section 3 apply, with a small number of specific expectations that follow from the distinctive character of these tools. Use of AI must also follow the UK Government AI Playbook principles relevant to the research (UK Government, 2025a).

**UK Government AI Playbook Principles**

- Principle 1: You know what AI is and what its limitations are
- Principle 2: You use AI lawfully, ethically and responsibly
- Principle 3: You know how to use AI securely
- Principle 4: You have meaningful human control at the right stages
- Principle 5: You understand how to manage the full AI life cycle
- Principle 6: You use the right tool for the job
- Principle 7: You are open and collaborative
- Principle 8: You work with commercial colleagues from the start
- Principle 9: You have the skills and expertise needed to implement and use AI solutions
- Principle 10: You use these principles alongside your organisation's policies and have the right assurance in place

Any use of AI to generate the substance[1] of a project application, which may include but is not limited to, formulating ideas, research questions or hypotheses; designing the study's approach or methods; or responding to the application questions, must be declared. Any intended use of AI must be declared at the design stage (see Section 6.1) in RCC proposals and inception outputs (including inception reports, research protocols, and data analysis plans). Any substantive use of AI must be disclosed in the resulting research outputs (see Section 6.3), ensuring that readers of study findings know how they were produced. A named researcher must always remain accountable for an AI-assisted output; AI must never be the sole basis for a substantive finding or for a decision affecting participants.

[1] Substantive AI use is distinguished from an AI editorial use, such as translating applications from another language; enhancing spelling, grammar or formatting; or reducing word count.

Personal, sensitive or confidential data must not be entered into AI tools that do not provide adequate, contractually assured protection against storing or using the data for training purposes (see Section 10.2). AI bias must also be actively considered, and where possible tested for, in any AI-assisted classification, screening, writing or analysis, especially where it bears on people in vulnerable circumstances.

Finally, AI-assisted analysis must always be validated against human judgement and documented well enough for others to scrutinise it, using the documentation and validation templates in Annex C. These expectations are consistent with the convergent international standards on trustworthy AI to which the UK and its partners subscribe (Floridi et al., 2018; Jobin, Ienca and Vayena, 2019; Organisation for Economic Co-operation and Development (OECD), 2019; European Union, 2024).

# 10. Safeguarding and data protection

Safeguarding obligations and the protection of personal data are afforded specific attention for RCC-commissioned research and impact activities, and they sit alongside ethical review. Both run through every stage of the research cycle, and both require ongoing review and systems for management rather than one-off approvals.

## 10.1 Safeguarding and the duty of care

This section sets out in practical terms what the principle of safeguarding (see Section 3.9) requires of those who deliver RCC-funded research, to protect the safety and welfare of research participants, staff and wider communities (Inter-Agency Standing Committee (IASC), 2019; UKCDR, 2020). A proportionate safeguarding and duty-of-care plan must be in place before research activities begin, underpinned by codes of conduct that bind all organisations and people involved, including staff, partners and subcontractors alike. These plans must abide by the IASC Six Core Principles and IASC Minimum Operating Standards, and address and respond to behaviours including sexual exploitation, abuse and harassment, broader forms of psychological abuse, physical violence, exploitation and bullying. RCC grantees must demonstrate appropriate safeguarding policies as part of the due diligence process before grants are issued. RCC lead grantees are responsible for ensuring safeguarding for everyone involved in the research process and they must similarly conduct due diligence on the capacity of partners and subcontractors to safeguard, in proportion to the risks the work presents, before they are engaged.

Safeguarding risks must be anticipated, assessed and mitigated before and throughout research and dissemination. There must be confidential channels through which participants, communities and staff can report concerns, and those channels must be adequately addressed by a designated individual. Reports must be acted upon in a survivor-centred way, guided by the survivor's rights and wishes, upholding confidentiality and preventing retaliation. All safeguarding incidents and adverse events must be responded to within two working days and reported immediately to the RCC via the 3ie Senior Human Resource Manager at safeguardingconcerns@3ieimpact.org.

The welfare and safety of researchers, participating communities, enumerators and locally engaged fieldworkers, who are often the most exposed and the least protected, must be actively looked after, with referral pathways available to those affected. Since risks do not end when data collection does, safeguarding must be monitored across the whole life of a study, including after fieldwork has finished and findings are disseminated (see Section 6.4).

## 10.2 Data protection, privacy and the management of data

This section gives practical guidance around the principles of privacy and confidentiality (see Section 3.6). The processing of personal data must rest on a lawful basis and comply with UK data protection laws or regulations[2] in addition to any applicable host-country law; where the two differ, the more protective standard governs. Data collection must be minimised, meaning that only what the research genuinely needs should be collected, and only for as long as it is needed.

[2] These include: Data Protection Act 2018; Freedom of Information Act 2000; General Data Protection Regulation (EU) 2016/679; The Environmental Information Regulations 2004; FCDO open access policy; and subordinate legislation, guidance and codes of practice issued by the Information Commissioner's Office or other UK Government departments.

Privacy must be designed into a study from the outset, with secure storage and secure transfer applied throughout the life of the data, and any movement of data across borders resting on a lawful transfer mechanism. Information that could identify a participant should be anonymised or pseudonymised as early as is practicable, and disclosure control applied to outputs so that people cannot be re-identified from what is published (see Section 6.3).

A data management plan must govern how data is retained, shared, archived and ultimately destroyed, with defined retention periods and controlled access. Identifiable, pseudonymised or sensitive research data must be held in approved systems, accessible only to authorised personnel, and protected by risk-appropriate access controls, backups and regular security reviews (see UK GDPR Guide to Data Security).

Personal data must not be transferred through personal email, unauthorised devices or services, or publicly accessible links (see UK GDPR Guide to Data Security). Personal data sharing with partners must be lawful, necessary, securely managed and documented (see UK GDPR Data Sharing Code of Practice). Encryption should be applied to stored data and data in transit where appropriate to the risks (see UK GDPR Guidance on Encryption). Where data is processed by third parties or AI tools, equivalent protection must be assured by contract (see Section 9). Personal or sensitive data should be anonymised before processing in AI tools.

Subject to the protection of participants and to the agreements made between partners, data should be managed so that it is findable, accessible, interoperable and reusable, in compliance with FCDO open access policy and in keeping with good practice in open and responsible science (Wilkinson et al., 2016).

Research outputs must be published alongside a Data Access Statement (DAS) detailing where the data supporting the research results reported in a published output can be found and how it can be accessed, subject to confidentiality requirements and applicable data protection considerations.

# 11. Ethics and safeguarding in research uptake and impact activities

This section applies to RCC-commissioned uptake and impact activities that use, translate, communicate or support the application of existing research. These may be dedicated projects under the RCC Impact Fund that do not involve new data generation or analysis but may also be built into traditional primary research grants. Uptake and impact activities remain ethically significant because efforts to generate societal impact can create risks around fairness, harm, consent, transparency, accountability, power and unintended consequences, particularly when researchers engage with policymakers, practitioners, industry, communities or other non-academic actors.

Ethical requirements should also be proportionate to the level of risk so that they support responsible engagement without creating unnecessary barriers to beneficial impact, particularly for historically marginalised groups (DFID, 2019; UKCDR, 2020; Nelson et al., 2021; Jensen et al., 2025). It is important to review the requirements for research in fragile and conflict-affected settings (Section 7); equitable international research partnerships (Section 8); the ethical use of AI (Section 9); and safeguarding and data protection (Section 10), depending on the type and context of the project involved. The following are key ethical and safeguarding considerations, specific to uptake and impact activities.

## 11.1 Build capability for equitable and lasting impact

RCC grantees should ensure that uptake and impact interventions are led by the needs and priorities of partners affected by or interested in the activity. The intended users, the expected form of impact, the assumptions behind the impact pathway, and the resources or relationships needed to sustain benefits beyond the grant period should be clearly defined. Grantees should also strive to build partners' and communities' resources, knowledge, and power so they can engage as equals, including through training, leadership roles, and resource support relevant to the context. Where activities create tools, platforms, networks, training materials or partnerships, the ownership, maintenance, accessibility, knowledge transfer, partner capacity and long-term governance should be carefully considered (Jensen et al., 2025).

## 11.2 Engage ethically and inclusively

Uptake and impact activities must meaningfully involve relevant parties, including affected communities, local partners, policymakers, practitioners, communities of practice and others who may benefit from or be harmed by the project. Grantees should systematically identify relevant parties; establish culturally appropriate, accessible and two-way communication channels; and, where possible, co-design engagement and impact activities with those most affected. This requires explicit attention to power imbalances, respect for local knowledge and cultural contexts, consistent ethical standards across all settings[3], and, where appropriate, co-created ethical expectations for research, engagement and impact practice (Nelson et al., 2021; Jensen et al., 2025).

[3] 'Ethics dumping' is the export of unethical or non-compliant research practices from higher-income or privileged settings to lower-income, resource-poor, or less-regulated regions (Schroeder et al., 2019).

RCC grantees will be asked to consider their engagement plans at project inception and to continually track these throughout the project and beyond, taking into consideration ethical factors as outlined above. Where impact activities use identifiable data or fall outside the scope or period of ethical approval covering the original primary research, an appropriate amendment, extension or new review must be obtained before the activity begins.

### 11.3 Managing risk and safeguarding

Grantees must proactively identify, assess and mitigate risks and potential harms that may arise during or after research uptake, engagement or impact activities, including harms to communities, partners, users or other affected groups. Grantees should work with relevant parties, and especially those most likely to be affected, to identify plausible risk scenarios, monitor both anticipated and emerging harms over time, establish clear protocols and complaint routes for responding to concerns, and use risk assessment to guide responsible decision-making and impact strategy under uncertainty (Jensen et al., 2025). Emerging and materialising risks to the project should be readily reported to the RCC and adaptive management practices put in place to mitigate risks. It is important to put in place proportionate safeguarding arrangements, including a named responsible person or focal point to prevent and address safeguarding incidents. Grantees must have appropriate safeguarding reporting channels and policies, which should be tested for efficiency regularly. All safeguarding concerns must be reported immediately to the RCC by email at safeguardingconcerns@3ieimpact.org.

### 11.4 Privacy, consent and respectful representation

Uptake and impact activities must protect participants' privacy, dignity and confidentiality when using names, images, quotations, recordings, case studies, stories, organisational examples or community-level information. Consent for research participation should not be assumed to cover later communications, advocacy or promotional use unless this was made clear at the time. Where identifiable material is used, for example, in case studies, testimonials, or images, grantees should confirm that consent, anonymisation and risk mitigation are appropriate to the context. Reporting, dissemination and engagement activities remain to subject data protection and security requirements (DFID, 2019).

Consent for communications must be voluntary and not influenced by actual or perceived dependence on aid, services, employment or other benefits. Participants should be told whether and how they may withdraw consent for future identifiable use, including the practical limits once material has been published. Communications must represent people and communities accurately and respectfully, avoiding stigma, stereotyping, sensationalism or exploitation. Before publication, grantees must assess risks to individuals, groups and communities, including the persistence, redistribution and limited removability of digital content.

### 11.5 Accountability and learning

Grantees should plan for proportionate evaluation of engagement and impact, involving affected groups or independent evaluators where relevant, reviewing key assumptions and assessing progress against agreed impact goals, stakeholder expectations and ethical commitments. Findings should be fed back to relevant parties and used to strengthen engagement and impact practice within and beyond the project or institution (Jensen et al., 2025). Accountability to participants and affected communities includes sharing findings in accessible formats and enabling feedback where appropriate.

# 12. Implementation, compliance and accountability

This section explains how the RCC turns the principle of accountability (see Section 3.5) into practice. Assurance begins with sign-off. Every funded activity must carry a documented ethics approval appropriate to its review classification (Tier 1 or 2) and valid for all activities it covers. Where approval is granted subject to conditions, those conditions must be met and evidenced before the work they govern proceeds. Ethical conduct must then also be monitored proportionately across the life of a study. Ethics and safeguarding are built into regular RCC project reporting and continuously monitored throughout the project and beyond. The RCC reserves the right to undertake a proportionate review or audit of relevant project records, systems and processes to verify compliance with this Framework, ethical approvals and research-integrity requirements, in line with the assurance and accountability principles of the Concordat to Support Research Integrity (Universities UK, 2025).

The RCC is currently developing supporting procedures and processes to effectively implement the Framework. As per the preliminary version in **Figure 1** (page 37), implementation starts at the application stage, where applicants are asked to consider relevant ethical issues and corresponding review routes in their RCC submissions. Grantees undertaking projects involving human participants or personal data must then obtain proportional ethical approval before data collection begins. The RCC team verifies that independent review has occurred and that necessary conditions are fulfilled, monitors ethical project implementation through progress updates, and escalates exceptional cases where needed. The RCC is establishing an internal Research Ethics Advisory Team (REAT) responsible for advising RCC programme or project technical leads to deal with ambiguous and difficult cases.

Non-compliance with the Framework attracts an RCC response that is graduated and proportionate, ranging from required corrective action and additional conditions through to, in serious cases, the suspension of activities or funding. Suspected research misconduct is handled in line with the Concordat to Support Research Integrity (Universities UK, 2025). Financial integrity is treated with equal seriousness: partners and subcontractors are subject to proportionate due diligence before they are engaged, and any suspected fraud, bribery or corruption is handled under the FCDO's counter-fraud requirements and the UK Bribery Act 2010. This binds RCC-funded organisations and those associated with them wherever they operate, through the same confidential, retaliation-protected channels, and may itself be a condition of continued funding.

Ethics records, including applications, decisions, conditions and correspondence, must be kept securely for a defined period, with controlled access, and must be open to appropriate institutional reporting and public scrutiny. Any ethics and safeguarding concerns must be reported to the RCC by email at safeguardingconcerns@3ieimpact.org. The RCC will manage all reported ethics and safeguarding concerns as per 3ie policies and procedures and the FCDO annual statement of compliance with the Concordat to Support Research Integrity 2024 to 2025.

The Framework itself is subject to version control and is reviewed on a defined cycle and whenever there is a material change in RCC policy or in the legal environment. Its implementation is aligned with the RCC's compliance processes and grantees contractual obligations, as well as the RCC's Equity Action Plan and its related policies, so that the commitments made here are kept consistent with the wider approaches the RCC has defined about how it works. The RCC maintains confidential channels through which grantees, research participants, staff and partners can raise concerns, with protection from retaliation for those who do.

## Figure 1: RCC Ethics Framework implementation process



## References

Aboderin, I., Fuh, D., Gebremariam, E.B. and Segalo, P. (2023) 'Beyond "equitable partnerships": the imperative of transformative research collaborations with Africa', *Global Social Challenges Journal*, 2, pp. 1–17. Available at: https://doi.org/10.1332/27523349Y2023D000000002.

Afsana, K., Habte, D., Hatfield, J., Murphy, J. and Neufeld, V. (2009) *Partnership assessment toolkit*. Canadian Coalition for Global Health Research. Available at: https://www.elrha.org/docs/document/%20pat_interactive_e-1.pdf?file_url=document/fkv4t79mkt0mlenvun181mf07p/4r71p5jcuua8dughi4tcblgg5si/original?content-type=application%2fpdf&name=pat_interactive_e-1.pdf.

ALLEA – All European Academies (2023) *The European code of conduct for research integrity*. Revised edn. Berlin: ALLEA. Available at: https://doi.org/10.26356/ECoC.

Association of Commonwealth Universities (ACU) (2023) *Equitable research partnerships toolkit*. Available at: https://www.acu.ac.uk/our-work/projects-and-programmes/equitable-research-partnerships-toolkit/.

Brito Salas, K. and Avento, R. (2023) *Ethical guidelines for global south academic partnerships*. Finnish University Partnership for International Development (UniPID). Available at: http://hdl.handle.net/10138/566406.

Canadian Institutes of Health Research (2005) *Developing a CIHR framework to measure the impact of health research.* Available at: https://publications.gc.ca/collections/Collection/MR21-65-2005E.pdf.

Canadian Institutes of Health Research, Natural Sciences and Engineering Research Council of Canada, and Social Sciences and Humanities Research Council of Canada (2022) *Tri-Council policy statement: ethical conduct for research involving humans (TCPS 2)*. Government of Canada. Available at: https://ethics.gc.ca/eng/documents/tcps2-2022-en.pdf.

Carpenter, D., Iphofen, R., Oates, J., Rawnsley, A. and Whitman, B. (2020) *Research ethics support and review in research organisations*. UKRIO and ARMA. Available at: https://ukrio.org/wp-content/uploads/Research-Ethics-Support-and-Review-in-Research-Organisations-UKRIO-ARMA-2020.pdf.

Cascant Sempere, M.J., Aliyu, T. and Bollaert, C. (2022) 'Towards decolonising research ethics: from one-off review boards to decentralised north–south partnerships in an international development programme', *Education Sciences*, 12(4), 236. Available at: https://doi.org/10.3390/educsci12040236.

Charter Coalition (2023) *Africa charter for transformative research collaborations*. Available at: https://africacharter.org/about/africa-charter/.

CHS Alliance, Groupe URD and Sphere Association (2024) *Core humanitarian standard on quality and accountability.* Available at: https://handbook.hspstandards.org/en/chs/2024/

Council for International Organizations of Medical Sciences (CIOMS) (2016) *International ethical guidelines for health-related research involving humans.* 4th edn. Geneva: CIOMS. Available at: https://doi.org/10.56759/rgxl7405.

Council on Health Research for Development (COHRED) (2018) *Research fairness initiative: reporting guide 2*. The Research Fairness Initiative. Available at: https://www.rfi.cohred.org/wp-content/uploads/RFI_Reporting_Guide_2.pdf.

Curtis, K., Fry, M., Shaban, R.Z. and Considine, J. (2017) 'Translating research findings to clinical nursing practice', *Journal of Clinical Nursing*, 26(5–6), pp. 862–872. Available at: https://doi.org/10.1111/jocn.13586.

Department for International Development (DFID) (2019) *DFID ethical guidance for research, evaluation and monitoring activities*. Department for International Development. Available at: https://www.gov.uk/government/publications/dfid-ethical-guidance-for-research-evaluation-and-monitoring-activities.

Economic and Social Research Council (ESRC) (2025a) *Framework for research ethics*. UK Research and Innovation. Available at: https://www.ukri.org/councils/esrc/guidance-for-applicants/research-ethics-guidance/framework-for-research-ethics/.

Economic and Social Research Council (ESRC) (2025b) *Research with children and young people.* Available at: https://www.ukri.org/councils/esrc/guidance-for-applicants/research-ethics-guidance/research-with-children-and-young-people/.

Economic and Social Research Council (ESRC) (2026) *Research with potentially vulnerable people.* Available at: https://www.ukri.org/councils/esrc/guidance-for-applicants/research-ethics-guidance/research-with-potentially-vulnerable-people/.

ESSENCE and UKCDR (2022) *Four approaches to supporting equitable research partnerships*. ESSENCE and UKCDR. Available at: https://ukcdr.org.uk/resource/four-approaches-to-supporting-equitable-research-partnerships/.

ESSENCE on Health Research (2012) *Five keys to improving research costing in low- and middle-income countries*. ESSENCE Good Practice Document Series. Available at: http://hdl.handle.net/10625/50375.

ESSENCE on Health Research (2014) *Seven principles for strengthening research capacity in low- and middle-income countries: simple ideas in a complex world*. ESSENCE Good Practice Document Series. Available at: https://tdr.who.int/publications/m/item/2014-06-19-seven-principles-for-strengthening-research-capacity-in-low-and-middle-income-countries-simple-ideas-in-a-complex-world.

European Union (2024) *Regulation (EU) 2024/1689 laying down harmonised rules on artificial intelligence (artificial intelligence act)*. Official Journal of the European Union. Available at: https://eur-lex.europa.eu/eli/reg/2024/1689/oj.

Evertsz, N., Bull, S. and Pratt, B. (2023) 'What constitutes equitable data sharing in global health research? A scoping review of the literature on low-income and middle-income country stakeholders' perspectives', *BMJ Global Health*, 8(3), e010157. Available at: https://doi.org/10.1136/bmjgh-2022-010157.

Floridi, L., Cowls, J., Beltrametti, M., Chatila, R., Chazerand, P., Dignum, V., Luetge, C., Madelin, R., Pagallo, U., Rossi, F., Schafer, B., Valcke, P. and Vayena, E. (2018) 'AI4People – an ethical framework for a good AI society: opportunities, risks, principles, and

recommendations', *Minds and Machines*, 28(4), pp. 689–707. Available at: https://doi.org/10.1007/s11023-018-9482-5.

Friesen, P., Kearns, L., Redman, B. and Caplan, A.L. (2017) 'Rethinking the Belmont report?', *The American Journal of Bioethics*, 17(7), pp. 15–21. Available at: https://doi.org/10.1080/15265161.2017.1329482.

Glasgow Centre for International Development (2025) *Guide to ethical challenges in international research*. University of Glasgow. Available at: https://www.gla.ac.uk/research/az/gcid/resources/ethics_guidance/.

Guillemin, M. and Gillam, L. (2004) 'Ethics, reflexivity, and "ethically important moments" in research', *Qualitative Inquiry,* 10(2), pp. 261–280. Available at: https://doi.org/10.1177/1077800403262360.

Health Research Authority (2026) *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-policy-framework-health-and-social-care-research/.

HM Treasury (2026) *The Magenta Book: central government guidance on evaluation.* Available at: https://assets.publishing.service.gov.uk/media/6a3157a0141f0690ad5fa438/CCS0126982978-001_PN10541411_Magenta_Book_Update_V2_Accessible_2__1_.pdf.

Horn, L., Alba, S., Gopalakrishna, G., Kleinert, S., Kombe, F., Lavery, J.V. and Visagie, R.G. (2022) 'The Cape Town Statement on fostering research integrity through fairness and equity', *7th World Conference on Research Integrity*. Cape Town, South Africa, 29 May – 1 June 2022. Available at: https://www.wcrif.org/guidance/cape-town-statement.

Horn, L., Alba, S., Gopalakrishna, G., Kleinert, S., Kombe, F., Lavery, J.V. and Visagie, R.G. (2023) 'The Cape Town Statement on fairness, equity and diversity in research', *Nature*, 615(7954), pp. 790–793. Available at: https://doi.org/10.1038/d41586-023-00855-y.

Information Commissioner's Office (ICO) (2022) *Data sharing covered by the code.* Available at: https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/data-sharing/data-sharing-a-code-of-practice/data-sharing-covered-by-the-code/.

Information Commissioner's Office (ICO) (2024) *What is special category data?* Available at: https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/lawful-basis/special-category-data/what-is-special-category-data/.

Information Commissioner's Office (ICO) (2025) *Anonymisation*. Available at: https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/data-sharing/anonymisation/.

Information Commissioner's Office (ICO) (2026) *Anonymisation, pseudonymisation and research: draft guidance on the use of anonymisation and pseudonymisation for research purposes*. ICO. Available at: https://ico.org.uk/media2/goaamspg/draft-guidance-on-the-use-of-anonymisation-and-pseudonymisation-for-research-purposes.pdf.

Inter-Agency Standing Committee (IASC) (2019) *IASC six core principles relating to sexual exploitation and abuse.* IASC. Available at:

https://interagencystandingcommittee.org/sites/default/files/migrated/2019-09/iasc_six_core_principles_relating_to_sexual_exploitation_and_abuse_sept_2019.pdf.

Inter-Agency Standing Committee (IASC) (2024) *IASC minimum operating standards: protection from sexual exploitation and abuse by own personnel.* IASC. Available at: https://interagencystandingcommittee.org/iasc-task-team-accountability-affected-populations-and-protection-sexual-exploitation-and-abuse/iasc-minimum-operating-standards-protection-sexual-exploitation-and-abuse-own-personnel.

Jensen, E.A., Reed, M.S., Daybell, J., Rutt, L., Jensen, A.M., Arrigoni, G., Ballesteros, M., Bhanbhro, S., Merkle, B.G., Hafferty, C., Iglehart, P., Khuri, S., Klimczuk, A., Marder, I.D., Milosavljevic, D., Pacheco-Mendoza, J., Pool, U., Robinson, S., Stringer, L.C., Taylor, S., Toomey, A.H., Martin, D., Taylor-Sayles, L.L., Makohon-George, A.N. and Rodrigo, R.T. (2025) 'Responsible research impact: ethics for making a difference', *Open Research Europe*, 5, 92. Available at: https://doi.org/10.12688/openreseurope.19649.1.

Jobin, A., Ienca, M. and Vayena, E. (2019) 'The global landscape of AI ethics guidelines', *Nature Machine Intelligence*, 1(9), pp. 389–399. Available at: https://doi.org/10.1038/s42256-019-0088-2.

Larkan, F., Uduma, O., Lawal, S.A. and van Bavel, B. (2016) 'Developing a framework for successful research partnerships in global health', *Globalization and Health*, 12(1), 17. Available at: https://doi.org/10.1186/s12992-016-0152-1.

Marais, D., Toohey, J., Edwards, D. and IJsselmuiden, C. (2013) *Where there is no lawyer: guidance for fairer contract negotiation in collaborative research partnerships*. Geneva: Council on Health Research for Development (COHRED). Available at: https://www.cohred.org/wp-content/uploads/2012/04/COHRED-guidancebookletv-web-ISBN.pdf.

National Commission for the Protection of Human Subjects of Biomedical and Behavioral Research (1979) *The Belmont report: ethical principles and guidelines for the protection of human subjects of research*. US Department of Health, Education, and Welfare. Available at: https://www.hhs.gov/ohrp/regulations-and-policy/belmont-report/read-the-belmont-report/index.html.

Nelson, E., Kamuya, D., Mumba, N. and Pratt, B. (2021) *Ethical dimensions of community engagement and involvement in global health research.* NIHR and IDS. Available at: https://www.nihr.ac.uk/media/21996/download/.

Organisation for Economic Co-operation and Development (OECD) (2015) *Frascati manual 2015: guidelines for collecting and reporting data on research and experimental development.* Paris: OECD Publishing. Available at: https://dx.doi.org/10.1787/9789264239012-en.

Organisation for Economic Co-operation and Development (OECD) (2019) *Recommendation of the Council on artificial intelligence (OECD AI principles)*. Paris: OECD Publishing. Available at: https://legalinstruments.oecd.org/api/print?ids=648&lang=en.

Organisation for Economic Co-operation and Development (OECD) (2023) *Glossary of key terms in evaluation and results based management for sustainable development*. 2nd edn. Paris: OECD Publishing. Available at: https://doi.org/10.1787/632da462-en-fr-es.

Powell, M.A., Krishnamurthy, S., Chan, L., Tisdall, E.K.M., Rizzini, I. and Nuggehalli, R.K. (2023) 'Reimagining institutional ethics procedures in research partnerships with young people across majority/minority world contexts', *Children's Geographies*, pp. 1–15. Available at: https://doi.org/10.1080/14733285.2023.2237923.

Schroeder, D., Chatfield, K., Singh, M., Chennells, R. and Herissone-Kelly, P. (2019) *Equitable research partnerships: a global code of conduct to counter ethics dumping*. Cham: Springer Nature. Available at: https://doi.org/10.1007/978-3-030-15745-6.

Shih, T., Gaunt, A. and Östlund, S. (2020) *Responsible internationalisation: guidelines for reflection on international academic collaboration*. STINT – The Swedish Foundation for International Cooperation in Research and Higher Education. Available at: https://urn.kb.se/resolve?urn=urn%3Anbn%3Ase%3Akth%3Adiva-342009.

Social Research Association (2021) *Research ethics guidance*. Social Research Association. Available at: https://the-sra.org.uk/common/Uploaded%20files/Resources/SRA%20Research%20Ethics%20guidance%202021.pdf.

Swiss Alliance for Global Research Partnerships (2025) *Guide for global research partnerships*. Swiss Academy of Sciences (SCNAT). Available at: https://globalresearch.scnat.ch/en/grp-guide.

Swiss Commission for Research Partnerships with Developing Countries (KFPE) (2018) *A guide for transboundary research partnerships: 11 principles*. 3rd edn. Swiss Academy of Sciences (SCNAT). Available at: https://scnat.ch/en/uuid/i/13beb0f7-4780-5967-a257-bd6cc3d5e424-A_Guide_for_Transboundary_Research_Partnerships_3rd_edition_-_2018.

Tapscott, R. and Machón, D.R. (2025) 'Procedural ethics for social science research: introducing the Research Ethics Governance dataset', *Journal of Peace Research*, 62(3), pp. 789–798. Available at: https://doi.org/10.1177/00223433241249352.

TRUST (2018) *The TRUST Code: a global code of conduct for research in resource-poor settings*. TRUST Equitable Partnerships. Available at: https://www.globalcodeofconduct.org/wp-content/uploads/2025/08/The_TRUST_Code.pdf.

UK Collaborative on Development Research (UKCDR) (2020) *Guidance on safeguarding in international development research*. UKCDR. Available at: https://doi.org/10.6084/m9.figshare.12173529.

UK Government (2021) *GSR professional guidance: ethical assurance for social and behavioural research in government*. Government Social Research. Available at: https://assets.publishing.service.gov.uk/media/60e808d0d3bf7f56801f3c3f/2021-GSR_Ethics_Guidance_v3.pdf.

UK Government (2025a) *Artificial intelligence playbook for the UK government.* Department for Science, Innovation & Technology. Government Digital Service. Available at: https://assets.publishing.service.gov.uk/media/67aca2f7e400ae62338324bd/AI_Playbook_for_the_UK_Government__12_02_.pdf.

UK Government (2025b) *Data and AI ethics framework.* Available at: https://www.gov.uk/government/publications/data-ethics-framework.

UK Research and Innovation (UKRI) and UNICEF (2021a) *Defining the agenda: key lessons for funders and commissioners of ethical research in fragile and conflict-affected contexts*. UKRI. Available at: https://www.ukri.org/wp-content/uploads/2021/11 /UKRI-161121-Defining-the-Agenda-Key-Lessons-for-Funders-of-Ethical-Research-in-Fragile-and-Conflict-Affected-Contexts.pdf.

UK Research and Innovation (UKRI) and UNICEF (2021b) *Ethical research in fragile and conflict-affected contexts: guidelines for reviewers.* UKRI. Available at: https://www.ukri.org/wp-content/uploads/2021/11/UKRI-161121-Ethical-Research-in-Fragile-and-Conflict-Affected-Contexts-Guidelines-for-Reviewers.pdf.

UK Statistics Authority (2021) *Data ethics.* Available at: https://uksa.statisticsauthority.gov.uk/about-the-authority/data-ethics/.

UNICEF China (2022) *A booklet for research, studies and evaluations.* Available at: https://www.unicef.cn/media/25521/file/Annex_2_-_2022_UNICEF_Booklet_for_RSE_EN.pdf.

United Nations Educational, Scientific and Cultural Organization (UNESCO) (2021) *Recommendation on the ethics of artificial intelligence*. UNESCO. Available at: https://unesdoc.unesco.org/ark:/48223/pf0000381137.locale=en.

Universities UK (2025) *The concordat to support research integrity*. 3rd edn. Universities UK. Available at: https://ukcori.org/wp-content/uploads/2025/12/The-Concordat-to-Support-Research-Integrity-2025.pdf.

Wellcome Trust (2025) *Research involving human participants policy*. Wellcome Trust. Available at: https://wellcome.org/research-funding/guidance/policies-grant-conditions/research-involving-human-participants-policy.

Wilkinson, M.D., Dumontier, M., Aalbersberg, Ij. J., et al. (2016) 'The FAIR guiding principles for scientific data management and stewardship', *Scientific Data*, 3(1), 160018. Available at: https://doi.org/10.1038/sdata.2016.18.

World Health Organization (WHO) (2007) *WHO ethical and safety recommendations for researching, documenting and monitoring sexual violence in emergencies*. Available at: https://iris.who.int/server/api/core/bitstreams/687b3e0a-6509-4a78-8036-cf470885cfbd/content.

# Annex A: Ethics and safeguarding self-assessment screen

Grantees should use this self-assessment screen for RCC-commissioned projects to support their proposed approach to ethics review.

| # | Trigger | Yes | No |
|---|---|---|---|
| 1 | Involves primary data collection from human participants | ☐ | ☐ |
| 2 | Uses identifiable, sensitive[4] or special-category personal data, whether collected directly or drawn from secondary, administrative or digital sources | ☐ | ☐ |
| 3 | Uses names, images, quotations, recordings, case studies or stories where people or organisations may be identifiable | ☐ | ☐ |
| 4 | Involves children, vulnerable groups or participants whose involvement may not be fully voluntary | ☐ | ☐ |
| 5 | Takes place in emergencies or fragile and conflict-affected settings | ☐ | ☐ |
| 6 | Involves activities on corruption, illicit activity or other politically sensitive topics that could expose individuals, communities, partners, policymakers or organisations to legal, reputational, social, political or security risks | ☐ | ☐ |
| 7 | Involves biomedical or health-related research | ☐ | ☐ |
| 8 | Creates safeguarding risks through data collection, events, travel, convening, online engagement or partnership working | ☐ | ☐ |
| 9 | Includes material use of AI involving personal, sensitive or confidential data | ☐ | ☐ |

**All "No"** → provisionally **low-risk activity**

**Any "Yes"** → signals **higher-risk activity**, typically requiring additional review.

[4] Sensitive personal data or special category personal data, according to UK GDPR, includes any one of the following: personal data revealing racial or ethnic origin; political opinions; religious or philosophical beliefs; trade union membership; genetic data; biometric data (where used for identification purposes); data concerning health; data concerning a person's sex life; and data concerning a person's sexual orientation. (See ICO, 2024.)

# Annex B: Equitable partnership reflection questions

Projects with more than one research organisation, especially involving LMIC partners, should reflect on these questions in the partnership context (Section 8). The questions are intended to guide the process of building equitable research partnerships by prompting partners to reflect critically, honestly and openly throughout the research lifecycle, even after the project closes.

## Co-creation and relevance

- Were research problems and priorities co-defined with local partners and communities?
- Is the work aligned with partner, community and government priorities, not only funder interests?
- Have partners co-defined success and pathways to use?
- What participatory approaches ensure inclusive co-design and co-implementation?
- Are there co-designed strategies for stakeholder involvement and evidence uptake?

## Equity and decision rights

- Are roles and decision-making (including budget authority and data) shared fairly?
- Is there a mechanism to credit all who play a relevant part in authorship?
- Have partners jointly developed mechanisms for equitable governance, ownership and agenda-setting?

## Challenging epistemic asymmetries

- How are local and Indigenous knowledge systems recognised as legitimate sources of insight?
- How are local languages used across the research process and outputs?
- Are theories, concepts and methods grounded in local realities?
- How is the research framed around context-specific development priorities?

## Fair financing and cost recovery

- Do budgets enable full cost recovery and timely disbursement to all partners?
- Are indirect costs, administrative loads and compliance burdens fairly budgeted? And are delivery chains maintained to show accountability and funding flows transparently?

## Due diligence and responsible internationalisation

- Are risks from international collaboration identified, assessed and mitigated?
- Are lead grantees managing due-diligence requirements effectively with downstream partners?
- Is there a mechanism to ease administrative burden in due diligence?
- Is due diligence multi-directional rather than one-way?

### Local ethics and regulatory respect

- Are local IRB/REC submissions planned or completed for each site, with a route for amendments?
- Where no local REC exists, how are local cultural norms and legal frameworks considered in review?

### Data, IP and knowledge sharing

- Who owns the data?
- Are data protection and other relevant national laws considered and agreed by all partners?
- What is agreed on data storage, right to use and ability to publish?
- Do data-sharing arrangements include fair attribution, capacity-building opportunities, and fair benefit sharing?

### Capacity strengthening

- What mutual system-strengthening and training are planned (admin, data, methods, leadership)?
- Are capacity-building goals, roles, milestones and budget jointly agreed?
- Are there co-designed tools to monitor capacity improvements for all partners?

### Safeguarding and duty of care

- What potential harms and power imbalances might the research create or exacerbate, and how are they jointly identified?
- What joint systems have been developed to anticipate, mitigate, address and learn from safeguarding risks and incidents, and are they contextually appropriate?
- Are all stakeholders aware of safeguarding reporting routes and are the needs of the survivor/participant central to the approach?

### Monitoring partnership health

- What collectively agreed indicators track equitable-partnership progress?
- What collectively agreed procedures govern concern-reporting and dispute resolution?

# Annex C: AI documentation and validation templates

Grantees should refer to the following aspects where AI tools are used in research (Section 9).

## C.1 AI documentation template

- Project and activity identifier; named accountable researcher
- AI tool(s): name, provider, version, access route (e.g. API, web)
- Task(s) performed by AI and stage of the research cycle
- Inputs: data types; whether any personal, sensitive or confidential data was involved; data protection basis
- Outputs and how they were used in the research
- Data handling: where data was processed; contractual data protection assurances
- Bias considerations and any testing undertaken

## C.2 AI validation reporting template (minimum reporting requirements)

- Validation method (e.g. human double-coding of a sample; comparison against a gold standard)
- Sample size and selection
- Agreement / accuracy metrics and thresholds applied
- Errors identified and how they were handled
- Residual limitations and their implications for findings

## C.3 Example disclosure paragraph

“AI tools were used to assist [task] at [stage]. Outputs were validated by [method] on [sample], with [metric/result]. A named researcher reviewed and remains accountable for all AI-assisted outputs. No [personal/sensitive] data was processed by tools lacking adequate data protection assurances.”

# Annex D: Glossary

The following provides definitions for key terms used throughout the Framework:

- **AI tool:** Software using machine learning or related techniques to perform tasks such as text generation, classification, coding, prediction or evidence synthesis.
- **Anonymisation:** The process of transforming personal data so that the person concerned is no longer identified or identifiable by means reasonably likely to be used. Effective anonymisation reduces the likelihood of identification to a sufficiently remote level, taking account of the data, the context of release, other information that may be available and the people who may seek access to it (ICO, 2025). Anonymisation is distinct from pseudonymisation.
- **Applicant:** Any individual or research organisation submitting an application to an RCC funding opportunity.
- **Data sharing:** The disclosure of personal data by transmission, dissemination or otherwise making it available to another person, organisation, partner or public audience. UK GDPR and ICO Data Sharing Code of Practice as well as other relevant laws/regulation should be followed where data sharing involves providing personal data to a third party, by whatever means; receiving personal data as a joint participation in a data sharing arrangement; the two-way transmission of personal data; and providing a third party with access to personal data on or via IT systems (ICO, 2022).
- **Evaluation:** The systematic and objective assessment of a planned, ongoing or completed intervention, including its design, implementation and results, to determine its relevance, coherence, effectiveness, efficiency, impact and sustainability. An evaluation should produce credible and useful information that supports learning, accountability and decision-making (OECD, 2023, p. 31).
- **Evidence generation activities:** An umbrella term for systematic activities that collect, analyse, interpret, synthesise or assess data and information to produce knowledge or inform decisions. For this Framework, these include research, evaluation, evidence synthesis, studies, surveys, assessments, monitoring-related analysis and other structured forms of data collection or analysis (UNICEF China, 2022, p. 49).
- **Evidence uptake or impact activities**: Activities that include the synthesis, dissemination, exchange and ethical application of research evidence through the dynamic and iterative process of interactions between researchers and relevant stakeholders (including research participants, communities, policymakers, practitioners, academics, funders) with the aim of translating evidence into action and improving societal or economic wellbeing (Canadian Institutes of Health Research, 2005; Curtis et al, 2017).
- **Formal ethics review:** An independent and documented assessment of a proposed research, evaluation or other evidence-generation activity by a competent research ethics committee, institutional review board or appropriately constituted ethical review panel. Its purpose is to determine whether the activity meets applicable ethical standards and adequately protects participants' rights, dignity, safety, privacy and welfare before the activity begins.

- **Grantee:** Any individual or research organisation awarded a research or Impact Fund grant by the RCC. Grantees are subject to the relevant due diligence, compliance and contractual terms for their grant. In multi-partner projects, the **lead grantee** (the individual or organisation who signs the grant agreement with the RCC) is responsible for ethical governance of the whole project and must ensure that relevant ethics, safeguarding and due diligence requirements apply throughout the delivery chain.
- **Institutional Review Board or Research Ethics Committee:** A specifically constituted review body established or designated by an institution (including private organisation) to protect the rights and welfare of human participants recruited to take part in biomedical, behavioural or social science research. IRB/REC attempt to ensure, both in advance and by periodic review, protection of participants by reviewing research proposals and related materials. IRB/REC protocols assess the ethics of research, evaluation or data collection and analysis and their methods; promote fully informed and voluntary participation by prospective subjects capable of making such choices (or, if that is not possible, informed permission given by a suitable proxy); and seek to maximise the safety of participants (UNICEF China, 2022, p. 50).
- **Personal data:** Any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person (UK GDPR, art. 4 (1)).
- **Pseudonymisation:** The processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information. For example, when names and other directly identifiable information are replaced with an alphanumeric identifier/code, provided that such additional information is kept separately and is subject to technical and organisational measures to ensure that the personal data is not attributed to an identified or identifiable natural person (UK GDPR, art. 4 (5)).
- **Re-identification of personal data:** The process of identifying a person from data that had been anonymised, de-identified, aggregated or pseudonymised, including by linking or matching those data with other available information. Re-identification risk is the reasonably foreseeable likelihood that such techniques could turn the information back into personal data relating to an identifiable person (ICO, 2025).
- **Research and development (R&D):** "… comprise creative and systematic work undertaken in order to increase the stock of knowledge – including knowledge of humankind, culture and society – and to devise new applications of available knowledge." (OECD, 2015, p. 44).
- **Safeguarding:** Preventing and addressing any sexual exploitation, abuse or harassment of research participants, communities and research staff, plus any broader forms of violence, exploitation and abuse relevant to research, such as bullying, psychological abuse and physical violence (UKCDR, 2020, p. 2).

- **Sensitive data/special category personal data:** Personal data that is likely to be more sensitive, and which needs extra protection, including personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade-union membership, as well as genetic data, biometric data used to identify a person uniquely, health data, and data concerning a person's sex life or sexual orientation. These data require additional protection and a specific legal condition for processing under Article 9 of the UK GDPR (ICO, 2024).
- **Vulnerable group:** People whose autonomy or capacity to protect their own interests is diminished by age, illness, disability, poverty or circumstance.

# Annex E: Mapping to existing frameworks

This Framework is consistent with, and draws on, established instruments. Where any sets a more protective standard, that standard applies.

| Domain | Resources |
|---|---|
| **Research ethics foundations** | The Belmont Report (National Commission for the Protection of Human Subjects of Biomedical and Behavioral Research, 1979); ALLEA European Code of Conduct (ALLEA – All European Academies, 2023); Tri-Council Policy Statement (Canadian Institutes of Health Research, Natural Sciences and Engineering Research Council of Canada, and Social Sciences and Humanities Research Council of Canada, 2022); CIOMS international ethical guidelines (CIOMS, 2016); Government Social Research Professional Guidance: Ethical Assurance for Social and Behavioural Research in Government (UK Government, 2021); Social Research Association Research Ethics Guidance (Social Research Association, 2021); UK Policy Framework for Health and Social Care Research (Health Research Authority, 2026); ESRC Framework for research ethics (ESRC, 2025a) |
| **Ethics review and integrity** | UKRIO and ARMA review guidance (Carpenter et al., 2020); Concordat to Support Research Integrity (Universities UK, 2025); |
| **UK government / FCDO / development research and evaluation** | FCDO/DFID ethics guidance (DFID, 2019); Magenta Book (HM Treasury, 2026) |
| **Safeguarding** | UKCDR safeguarding guidance (UKCDR, 2020); ESRC guidance on research with children and young people (ESRC, 2025b), ESRC Research with potentially vulnerable people (ESRC, 2026); Defining the Agenda: Key Lessons for Funders and Commissioners of Ethical Research in Fragile and Conflict-Affected Contexts and Guidelines for Reviewers (UK Research and Innovation (UKRI) and UNICEF, 2021a, 2021b); IASC Six Core Principles Relating to Sexual Exploitation and Abuse (IASC, 2019); IASC Minimum Operating Standards - Protection from Sexual Exploitation and Abuse by own Personnel (IASC, 2024); Core Humanitarian Standard on Quality and Accountability (CHS Alliance, Groupe URD and Sphere Association, 2024) |
| **Equitable partnerships** | TRUST Global Code of Conduct for research in resource-poor settings (TRUST, 2018) and Equitable research partnerships: A global code of conduct to counter ethics dumping (Schroeder et al., 2019); Four approaches to supporting equitable research partnerships (ESSENCE and UKCDR, 2022); COHRED |

| Domain | Resources |
|---|---|
| | Research Fairness Initiative (COHRED, 2018); Africa Charter for transformative research collaborations (Charter Coalition, 2023); The Cape Town Statement on Fostering Research Integrity through Fairness and Equity (Horn et al., 2022); Guide for Global Research Partnerships (Swiss Alliance for Global Research Partnerships, 2025); Responsible Internationalisation: Guidelines for reflection on international academic collaboration (Shih, Gaunt and Östlund, 2020); UniPID Ethical guidelines for global south academic partnerships (Brito Salas and Avento, 2023) |
| **Research partnerships, capacity and fair financing** | Developing a framework for successful research partnerships in global health (Larkan et al., 2016); ESSENCE Five keys to improving research costing in low- and middle-income countries (ESSENCE on Health Research, 2012) and Seven principles for strengthening research capacity in low- and middle-income countries (ESSENCE on Health Research, 2014) |
| **Data** | The FAIR guiding principles for scientific data management and stewardship (Wilkinson et al., 2016); Data ethics (UK Statistics Authority, 2021); Data and AI Ethics Framework Guidance (UK Government, 2025b); and relevant UK (Data Protection Act 2018; Freedom of Information Act 2000; General Data Protection Regulation (EU) 2016/679 and host-country data protection laws |
| **AI governance** | UNESCO Recommendation on the ethics of artificial intelligence (UNESCO, 2021); OECD AI Principles (OECD, 2019); EU AI Act (European Union, 2024); AI4People – an ethical framework for a good AI society (Floridi et al., 2018); Artificial intelligence playbook for the UK government (UK Government, 2025a) |
| **Research uptake, impact and community engagement** | Responsible research impact: Ethics for making a difference (Jensen et al., 2025); Ethical dimensions of community engagement and involvement in global health research (Nelson et al., 2021); Ethical guidance for research, evaluation and monitoring activities (DFID, 2019); Guidance on safeguarding in international development research (UKCDR, 2020) |
| **Relevant UK legislation** | Anti-Terrorism, Crime and Security Act 2001; Crime and Disorder Act 1998; Data Protection Act 2018; Equality Act 2010; Freedom of Information Act 2000; General Data Protection Regulation (EU) 2016/679; Health and Social Care Act 2012; Human Rights Act 1998; Mental Capacity Act 2005; Public Sector Equality Duty 2010 |

## Statement on the use of AI

In keeping with the expectations this Framework sets for the research it governs (see Section 9), we record here how artificial intelligence was used in preparing the Framework itself. AI tools were used to assist with drafting, structuring and editing the text, and with checking and formatting references. All content was reviewed, verified and revised by the named authors, who take full responsibility for the Framework, including the accuracy of its claims and citations, and no personal or confidential data was processed in its preparation.




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