

## UREC-approved criteria of very high risk data processing (Section E)

For ease, the following text regarding the UREC-approved criteria of very high risk data processing has been extracted from the guidance on [academic research involving personal data](#):

“Committees will also ask principal investigators to confirm whether their use of personal data poses a very high ethical risk. In making this initial judgement about whether the project is high-risk, principal investigators are advised to refer to the discipline-specific bespoke criteria set out by the relevant REC.

The following points are indicative of the information that RECs may expect the principal investigators to consider (where applicable):

- a) Utilisation of personal data that is highly and unusually sensitive, particularly where publication of this information could be extremely harmful to the career or personal life of the individual concerned especially where it concerns vulnerable groups.
- b) The processing of personal data that, in the event of a security breach or inappropriate publication, might endanger the physical health or safety of the individual concerned.
- c) Processing of identifiable biometric or genetic data or the tracking of an identifiable individual’s location or behaviour where the processing poses a plausible risk of harm or significant adverse effect to the individual to whom the data relates in a way that is unusual for the type of research being undertaken.
- d) Profiling individual children or other vulnerable individuals.
- e) The collection of sensitive personal data, the monitoring of public spaces, or the profiling of individuals on a large scale in a way that is unusual for the type of research being undertaken.
- f) Direct collection of personal data without the research participant providing consent, where it would normally be provided in comparable research.
- g) Collection or combination of personal data using a highly innovative technological or organisational solution for which there is a plausible risk of harm or significant adverse effect to individual persons that is unusual for the type of research being undertaken.
- h) Automated decision-making or profiling that leads to a significant effect for research participants on an individual basis (please note that this is highly unlikely to occur in research).

Any projects processing personal data in a manner that poses a very high ethical risk will be referred by the Chair of the Committee to the University’s Information Compliance Office and/or Data Protection Officer for further advice.”