Research Policy

POLICY # EAAS/2024/240263

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European Academy of Advanced Studies (EAAS)

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1. Purpose and Scope

The European Academy of Advanced Studies (EAAS) is committed to a research culture that advances knowledge, informs teaching, and contributes to the development of the tourism and hospitality sector in Malta and internationally. This Policy sets out the principles, responsibilities, and procedures governing research conducted under the auspices of EAAS.

It applies to all research and scholarly enquiry undertaken by academic staff, visiting lecturers, administrative staff, and students, including the research project undertaken in the final stage of the Bachelor of Arts (Honours) in Tourism and Hospitality Management. It applies equally to funded and unfunded work, to collaborative projects with external partners, and to research conducted remotely with participants in any jurisdiction.

EAAS is an online higher education institution whose research activity is concentrated in the social sciences and in applied enquiry within tourism and hospitality. EAAS does not conduct research involving non-human animals and does not maintain facilities for such research. Should any such proposal arise, it would require prior authorization from the Senate / Academic Council and compliance with the Animal Welfare Act and applicable Maltese and EU law before any ethical review could commence.

2. Status and Legal Framework

This Policy is a linked policy under the EAAS General Academic Regulations and is to be read together with the Ethics Policy; the Privacy Policy and Data Protection Policy; the Academic Integrity, AI, Online Assessment and VLE Use Policy; the Student Code of Conduct Policy; and the Student Grievances and Redressal Policy. Where a linked policy provides greater operational detail, that policy governs the detail; where there is a conflict on an academic matter, the General Academic Regulations prevail.

The Policy is made under, and interpreted consistently with:

- the Further and Higher Education Authority Act (Chapter 607) and S.L. 607.03;
- the Data Protection Act (Chapter 586) and the General Data Protection Regulation (EU) 2016/679, Article 89 on processing for research purposes;
- the European Code of Conduct for Research Integrity (ALLEA);
- the Standards and Guidelines for Quality Assurance in the EHEA (ESG 2015) and the National Quality Assurance Framework (NQAF); and
- applicable Maltese legislation on equality, non-discrimination, and copyright.

3. Research Objectives

- To promote excellence and rigour in research across the disciplines EAAS teaches.
- To ensure that all research conducted under the auspices of EAAS meets the highest standards of integrity, ethics, and professionalism.
- To support the dissemination and practical application of research findings, particularly within the tourism and hospitality sector.
- To build the research capacity of staff and students, and to embed enquiries within teaching.

- To foster collaboration with academic, industry, and community partners.
- To encourage innovation and knowledge transfer, while protecting intellectual property and the interests of research participants.

4. Principles of Research Integrity

EAAS adopts the four principles of the European Code of Conduct for Research Integrity.

- **Reliability.** Quality of design, method, analysis, and use of resources, so that findings can be depended upon.
- **Honesty.** Transparent, fair, and unbiased development, review, reporting, and communication of research.
- **Respect.** For colleagues, research participants, society, ecosystems, cultural heritage, and the environment.
- **Accountability.** For the research from idea to publication, for its management and organisation, for training and supervision, and for its wider impacts.

Research misconduct, in any of the forms listed at Section 11, is prohibited. Honest errors, and differences of scientific judgement honestly held, are not misconduct.

5. Ethical Review

5.1 When approval is required

Ethical approval must be obtained before any data collection begins. Retrospective approval is not granted. Approval is required for all research that involves:

- human participants, whether through interview, survey, observation, focus group, or experiment;
- personal data, including data obtained from an employer, a partner organisation, or a public source where individuals remain identifiable;
- special category data under Article 9 of the GDPR;
- sensitive topics, or any foreseeable risk of harm or distress to participants or researchers; or
- the transfer of personal data outside the European Economic Area.

5.2 Categories of review

The Research Ethics Sub-Committee (RECS) operates a proportionate, three-tier model. Categorization is determined by the RECS Chair, not by the applicant.

Category	Typical studies	Route and timeframe
Exempt	Studies using only published, anonymous, or fully aggregated secondary data, with no identifiable individuals and no sensitive topic.	Registered with the RECS; confirmed by the Chair. 5 working days.
Expedited	Low-risk studies with competent adult participants: interviews or surveys with	Reviewed by the Chair and one member. 10 working days.

Category	Typical studies	Route and timeframe
	tourism and hospitality professionals, non-sensitive topics, no special category data.	
Full review	Studies involving vulnerable participants, minors, special category data, deception, covert observation, sensitive topics, or transfer of personal data outside the EEA.	Reviewed by the full RECS at a convened meeting. 20 working days.

Approval is valid for twelve months, or for the duration of the study-unit in the case of student research. A material change to an approved protocol requires an amendment application before the change is implemented.

5.3 Informed consent

Element	Requirement
Information	A participant information sheet in plain language, stating purpose, procedure, duration, risks, benefits, and how data will be used.
Voluntariness	Participation must be free of inducement, pressure, or professional consequence. Students must never be recruited by their own tutor in a way that implies obligation.
Comprehension	Materials in a language the participant understands; translation certified where necessary.
Documentation	Written or verifiable electronic consent, retained separately from research data.
Withdrawal	The right to withdraw without giving a reason, and a stated point after which withdrawal is no longer practicable because data has been anonymized.
Data protection	The lawful basis, retention period, and the participant's GDPR rights, consistent with the EAAS Privacy Policy.

5.4 Vulnerable participants and heightened risk

- Research involving minors, persons lacking capacity, or participants in a relationship of dependency on the researcher requires full review and, where applicable, the consent of a parent or guardian together with the assent of the participant.
- Deception and covert observation are permitted only when the research question cannot otherwise be addressed, the risk is minimal, and a debriefing protocol is approved in advance.
- Researchers must consider risk to themselves, particularly in fieldwork and in online research on sensitive topics and set out mitigation in the application.

5.5 Appeal against an ethics decision

An applicant may request reconsideration by the RECS within 10 working days and may thereafter appeal to the Ethics and Compliance Committee on grounds of procedural irregularity, bias, or new material evidence. Disagreement with a properly exercised ethical judgement is not a ground of appeal.

6. Student Research

The final-stage research project is the principal locus of student research at EAAS. The following provisions apply in addition to the assessment requirements in the study-unit specification.

- No student may collect data before ethical approval is confirmed in writing. The supervisor is accountable for ensuring this, and the Didactic Board will not except for assessment of a project for which approval was absent or retrospective.
- Student projects are normally categorized as exempt or expedited. A project requiring full review must be identified early enough for the RECS to convene.
- Students conduct research under supervision. The supervisor guides the design and critiques the work, but does not write it, analyse the data, or otherwise appropriate the student's effort.
- Where a student project gives rise to publishable findings, authorship is determined by the criteria at Section 9. A supervisor who does not meet those criteria is acknowledged, not listed as an author.
- Students must declare any use of generative AI in their research, in accordance with the Academic Integrity, AI, Online Assessment and VLE Use Policy. Undeclared use of AI to generate data, analysis, or text is academic misconduct.
- Personal data collected by students is processed on institutional systems, is subject to the Privacy Policy, and is deleted or anonymized at the end of the retention period stated in the approved data management plan.

7. Research Data Management

Researchers must maintain accurate, complete, and retrievable records of their data, methods, and decisions, sufficient to allow the work to be verified.

Requirement	Standard
Data management plan	Required for every project subject to expedited or full ethical review, submitted with the ethics application.
Storage	On institutional systems only. Personal data encrypted at rest and in transit. No storage on personal devices or unapproved cloud services.
Pseudonymization	Identifiers separated from research data and held under separate access control wherever the design permits.
Access	Restricted to the named research team. Supervisors have access to student project data for supervision and examination only.

Requirement	Standard
Retention	Research data retained for a minimum of 5 years after publication or completion; consent records retained for the same period; personal data deleted or anonymized at the end of the stated period.
Sharing	Data shared only in accordance with participant consent, the Privacy Policy, and any transfer safeguards under Chapter V of the GDPR.
FAIR principles	Where data can be shared, EAAS supports making it findable, accessible, interoperable, and reusable, with appropriate access controls.

Where research data constitutes personal data, EAAS relies on Article 89 safeguards, including data minimization and pseudonymization. Nothing in this Policy displaces the rights of data subjects set out in the Privacy Policy.

8. Conflict of Interest and Funding

- Researchers must declare any financial, personal, institutional, or commercial interest capable of influencing, or appearing to influence, the design, conduct, or reporting of research. Declarations are recorded on the conflict-of-interest register maintained by the QA and Compliance Unit.
- A declared interest does not necessarily preclude the research; it must, however, be disclosed to the RECS, to any funder, and in any resulting publication.
- EAAS may provide internal funding and supports applications for external grants. Researchers must comply with the terms and reporting requirements of the funding body.
- Research funds are administered with integrity and transparency, and all expenditure is accounted for under the financial regulations of EAAS. Where a funder seeks to restrict publication of unfavourable findings, the arrangement must be approved in advance by the Senate / Academic Council; EAAS will not accept funding conditional on suppression of results.

9. Authorship, Publication and Intellectual Property

9.1 Authorship

Authorship is credited to those, and only those, who meet all four of the following criteria.

Criterion	Explanation
Substantial contribution	To conception or design, or to acquisition, analysis, or interpretation of data.
Drafting or revising	Drafting the work or revising it critically for intellectual content.

Criterion	Explanation
Final approval	Approving the version to be published.
Accountability	Agreeing to be accountable for the integrity of the work as a whole.

Contributors who do not meet all four criteria are acknowledged. Gift, guest, and ghost authorship are forms of research misconduct. Authorship orders are agreed among the authors at the outset and revisited before submission.

9.2 Publication and dissemination

- EAAS encourages publication in reputable, peer-reviewed venues and supports open access wherever ethical, legal, and contractual considerations permit.
- Researchers must not submit to predatory venues. Where a venue's standing is uncertain, advice should be sought from the Research Coordinator.
- Conflicts of interest and funding sources are disclosed in every publication.
- Any material use of generative AI in the preparation of research output must be disclosed in the methods or acknowledgements. An AI system cannot be an author, because it cannot accept accountability.
- Researchers submit an annual progress report to the Research Coordinator, and record outputs on the institutional research register.

9.3 Intellectual property

- Intellectual property created by staff in the course of employment vests in EAAS, unless otherwise agreed in writing.
- Intellectual property in a student's own research output, including the final-stage project, vests in the student. EAAS retains a non-exclusive, royalty-free license to retain, examine, archive, and use the work for academic, quality assurance, and accreditation purposes.
- Where a student project forms part of a collaborative or funded project, ownership is agreed in writing before the work begins, and the student is a party to that agreement.
- Teaching materials, recordings, and platform content are governed by the institutional intellectual property arrangements and by the Ethics Policy.

10. Roles and Responsibilities

Body / role	Responsibility
Researcher (staff or student)	Conduct research ethically and competently; obtain approvals before commencing; ensure accuracy of data; declare conflicts and AI use; disseminate findings appropriately.
Supervisor	Ensure the student holds ethical approval before data collection; guide without appropriating the student's work;

Body / role	Responsibility
	observe feedback timelines; declare any interest affecting examination.
Research Coordinator	Supports researchers; administers ethical review; maintains the research and conflict-of-interest registers; identifies funding; reports annually. Contact: research@eaas.mt
Research Ethics Sub-Committee (RECS)	Reviews and approvals of research proposals; advice on ethical questions; monitors approved projects; reports to the Ethics and Compliance Committee.
Ethics and Compliance Committee (ECC)	Receives RECS reports; investigates allegations of research misconduct under the Ethics Policy.
Didactic Board	Approves the assessment of student research projects and ratify marks.
QA and Compliance Unit	Audits compliance with this Policy; feeds research data into the Annual Programme Analysis.
Senate / Academic Council	Owns the Policy; appoints RECS members; receives the annual research and ethics report.

11. Research Misconduct

11.1 Forms of misconduct

Form	Definition
Fabrication	Inventing data, results, or sources that do not exist.
Falsification	Manipulating data, images, materials, or processes so that the research record does not accurately reflect the work done.
Plagiarism	Using work, ideas, or words of others without proper attribution and permission.
Improper authorship	Gift, guest, or ghost authorship; omitting a person who meets the authorship criteria; adding one who does not.
Undisclosed AI generation	Presenting text, data, images, or analysis generated by an AI system as original scholarly work, without declaration.
Undeclared conflict	Failing to disclose a financial, personal, or institutional interest capable of influencing the research.
Ethics breach	Conducting research without required ethical approval or departing materially from the approved protocol.
Misuse of data	Breach of confidentiality, unauthorized disclosure, or processing outside the consent obtained.

11.2 Procedure

- An allegation of research misconduct is reported to the Ethics and Compliance Committee through the reporting channel published under the Ethics Policy. Reports may be made anonymously, subject to the limits stated in that Policy.
- The ECC conducts an initial assessment to determine whether the allegation, if substantiated, would constitute misconduct, and whether there is sufficient evidence to proceed.
- Where the matter proceeds, the ECC appoints an investigation panel. No member may have any interest in the matter or prior involvement in it. Where the allegation concerns a member of the RECS, an external member is appointed.
- The person accused is informed of the substance of the allegation, is given the evidence relied upon, and is afforded a fair opportunity to respond before any finding is made.
- Findings and reasons are issued in writing. Sanctions follow the tiered scheme in the Ethics Policy, and may extend to correction or retraction of publications, withdrawal of an award, or termination of engagement.
- Where a finding affects the integrity of the published record, EAAS notifies the publisher, and any funder or collaborating institution, and supports correction or retraction.
- A person subject to findings may appeal to the Institutional Appeals Committee, on the grounds and within the timeframes set out in the Student Grievances and Redressal Policy.
- A person who reports misconduct in good faith is protected from retaliation under the Ethics Policy. Malicious or bad-faith allegations are themselves a conduct matter.

12. Support and Development

- EAAS provides access to research infrastructure, including e-libraries, bibliographic databases, reference management, and analysis software.
- Training is offered in research design, research integrity, data management, GDPR compliance, and the responsible use of AI in research.
- Mentorship and peer review are available to early-career researchers, and research duties are recognised in staff workload models.
- Supervisors of student research receive training in supervision and in the ethical review process.

13. Compliance, Monitoring, Review and Version Control

- The RECS maintains a register of applications, decisions, and approved projects, and monitors compliance with approved protocols.
- The Research Coordinator reports annually to the Senate / Academic Council on research activity, ethical review, misconduct cases, and outputs.
- The QA and Compliance Unit audits compliance with this Policy, and research data feeds into the Annual Programme Analysis and the institutional quality cycle.

- This Policy is owned by the Senate / Academic Council, maintained by the Research Coordinator, and reviewed at least annually or upon regulatory change.
- Amendments are approved by the Senate / Academic Council and communicated to staff and students.

Appendix 1 — Application for Ethical Approval

Submit to research@eaas.mt before any data collection begins. Student applications must be countersigned by the supervisor.

Section A — Applicant and project

Applicant name	
Status (staff / student)	
Programme and stage (students)	
Supervisor (students)	
Project title	
Proposed start and end dates	

Section B — Screening questions

Answer yes or no to each. Any "yes" in questions 3–8 triggers full review.

- 1. Does the project involve human participants?
- 2. Does the project process personal data of identifiable individuals?
- 3. Does it involve participants under 18, or adults lacking capacity?
- 4. Does it involve special category data (health, beliefs, ethnicity, sexual life, biometrics)?
- 5. Does it involve deception, covert observation, or withholding information?
- 6. Does it address a sensitive topic, or risk distress to participants or researchers?
- 7. Does it recruit participants who are in a dependent relationship with the researcher?
- 8. Will personal data be transferred outside the European Economic Area?

Section C — Project detail

Research question	
Design and method	
Participants: number, characteristics, recruitment	
Risks and mitigation	
Consent procedure	
Data storage, access, and retention	

Declared conflicts of interest	
Declared use of generative AI	

Section D — Attachments

- Participant information sheet
- Consent form
- Data management plan (expedited and full review)
- Instruments: questionnaire, interview schedule, or protocol

Section E — Declaration

I confirm that I have read the EAAS Research Policy and the Ethics Policy; that I will not begin data collection before written approval is issued; that I will seek an amendment before any material change to the protocol; and that I will conduct this research in accordance with the approved design.

Applicant signature and date	
Supervisor's signature and date	
RECS category assigned	
Decision and date	
Chair signature	

Appendix 2 — Participant Information and Consent Template

Participant information sheet

The following headings must appear, in plain language, in the participant's own language where practicable.

- Who is conducting the research, and under whose supervision.
- What the research is about, and why the participant has been approached.
- What participation involves, and how long it will take.
- What the risks and benefits are, if any.
- Whether participation is voluntary, and that refusal carries no consequence.
- How data will be stored, who will have access, and how long it will be kept.
- Whether findings will be published, and whether the participant can be identified.
- The right to withdraw, and the point after which withdrawal is no longer practicable.

- The lawful basis for processing, and the participant's rights under the GDPR.
- Contact details for the researcher, the supervisor, the RECS Chair, and the Data Protection Officer (dpo@eaas.mt).

Consent form

The participant initials each statement.

- I have read and understood the participant information sheet.
- I have had the opportunity to ask questions, and these have been answered.
- I understand that my participation is voluntary and that I may withdraw at any time, without giving a reason, up to the point stated.
- I understand how my data will be stored, used, and retained.
- I consent to the processing of my personal data for the purposes of this research.
- I consent / do not consent to the use of anonymized direct quotations in publications.
- I consent / do not consent to audio or video recording of my participation.
- I agree to take part in this research.

Participant name	
Participant signature and date	
Researcher name	
Researcher signature and date	

Consent records are stored separately from research data and retained for the period stated in the approved data management plan.