UNIVERSITY OF EXETER

COLLEGE OF SOCIAL SCIENCES AND INTERNATIONAL STUDIES

SSIS Ethics Guidance

The advice in this document is for staff and students in Egenis, the Institute for Arab and Islamic Studies, Law, Politics, Sociology, Philosophy and Anthropology.

A separate ethics procedure is used for the Graduate School of Education - for further information on the GSE procedure please contact ssis-gseethics@exeter.ac.uk.

Ethics approval can be a lengthy process which can take between 3 and 6 months.
Fieldwork must not start until approval is granted so researchers should check the deadlines and meeting schedule which can be found at http://intranet.exeter.ac.uk/socialsciences/ethics/.

You should plan well in advance and consider carefully the research activities, participants and locations proposed. To minimise the requirement for amendments to your application (which must be approved before you can start your research) you are encouraged to make full use of the guidance and resources available. The Committee are obliged to rely on the information you give in your application – they are not able to assume or infer anything about your knowledge, skills, experience, nationality or background, so you must set out clearly any factors which may help them assess your capacity to safely carry out your project.

Ethics decisions are often contextual meaning that the same location or activity may be approved in one instance but not in another; it is not wise to assume that your application will succeed simply because it is similar to another application which was previously approved.

Ethical review should not be considered as a 'tick box' exercise or barrier to research: it is one means by which the University exercises its duty of care to the public, research participants, and researchers; it also helps protect the reputation of the University. SSIS Ethics Committee takes a flexible approach to different types of research, considers the individual skills, knowledge and experience of the researcher, and is sympathetic to cultural differences in what might be appropriate ethical procedures. The Committee considers it very important that researchers think through the way in which they research with other people, and critically consider how this can be done ethically and sensitively.

All student applications must include a statement from their supervisor (an email) which confirms that their supervisor has read the application and approves its submission.

Application outcomes: Approved, Referred or Rejected.
Approved: means you are free to commence research from the approval date within the parameters of the application as approved. Significant changes to research methods, location, participants or dates will require re-approval via an amendment request.

Referred: means you need to make changes to your application, clearly marking them in the text, and return for assessment. You are not free to start your research until you have received confirmation that your amendments have been accepted. This can be an iterative process and is the stage at which applications are commonly delayed.

Rejected: either the proposal is unworkable or the application is so poorly drafted it is beyond amendment. Applicants will be advised whether or not they are permitted to rewrite and resubmit the application and, if so, key points to address. Rejection may also result from the research proposal not being deemed appropriate to the skills, knowledge and experience of the researcher.

Benefits of making an ethics application

- It is a UoE mandatory requirement for research involving human participants; failure to comply can jeopardise your qualification or research project and can be treated as research misconduct. If you are doing a PhD you may be required to provide documentation of ethical approval (e.g. in the thesis appendices) and are putting your whole PhD at risk if you cannot provide it.
- It gives you an opportunity to think through the ethical dilemmas which inevitably arise when you research with human participants.
- It helps you to ensure that the participants are well-informed and have fully consented to take part in your research.
- It helps ensure the safety of everyone involved.
- It is a requirement for publication in many major journals; you will be asked to include a sentence confirming this in your papers.
- Many countries and organizations require you to carry the Ethical Approval document with you to confirm who you are and that what you are doing has been approved.
- It will help ensure you comply with the General Data Protection Regulation in relation to research data.
- It is an opportunity to receive expert feedback which will ultimately enhance your research.

Who needs to make an ethics application in SSIS?

ALL research projects involving human participants need to be submitted for ethical review.

- All staff and PhD/ postgraduate research students who are engaged in research with human subjects, their data or tissue, should make an ethics submission to the SSIS Ethics Committee.
- It is the responsibility of members of staff and research students to identify where their research may raise ethical issues, familiarise themselves with the ethics procedure and submit their work for review.
- In cases of taught postgraduate and undergraduate students it is primarily the responsibility of the supervisor to identify projects that need to be submitted for ethical review (see below). Such applications are considered in the first instance by the Departmental Representative who may in turn refer the application for wider review. This process can take a significant length of time and, as such, the Committee would encourage supervisors of UG and PGT students to consider very carefully whether the proposal is appropriate to the level of experience held by, and the time available to, the student.
- Studying Internet communication is a grey area, but in some cases projects studying electronic communication should also be submitted (e.g. when communication verges on the private, such as discussion on some of the self-help newsgroups or listservs).
- Access to Restricted Materials: restricted online material can legitimately be accessed in compliance with the relevant UoE policy:
  http://www.exeter.ac.uk/ig/policy/restrictedmaterials/
  The "Request for Access to Restricted Materials form" requires evidence of ethics approval OR a note confirming exemption, each of which can be requested via ssis-ethics@exeter.ac.uk
- In some cases projects based on documents need to be submitted for ethical consideration. In principle historical research should respect the rules of privacy set by the archive. However, in some cases research on archival resources, such as private patient records, may need to be submitted for ethical review.

Process for undergraduate and taught postgraduate students

UG and PGT applications can be submitted for review by the relevant Departmental Representative at any time. However, consideration should be given to the potential for referral for additional review by Chair or Committee which can considerably extend the time taken to receive a decision. Due to their relative lack of research experience UG and PGT students may require significant supervisory support to successfully complete an ethics application; applications which involve potentially dangerous locations or vulnerable participants or are otherwise complex will be referred for additional review.

Taught Masters' students

Taught postgraduates should review the ethical dimensions of their project with their supervisor. The responsibility rests with the supervisor to identify which projects should be submitted for review (see procedure below).

Undergraduate students

Where an undergraduate student proposes to undertake work with human participants, the supervisor may permit this by reference to criteria of e.g. scope, feasibility, clear benefit to the project, and value that outweighs any risk or harm. The responsibility rests with the supervisor to identify which projects should be submitted for ethical review (see procedure below).

Procedure for taught Masters and undergraduate students

Supervisors should carefully consider whether the proposed research is appropriate within the relevant time frame available and whether the nature of the research proposed is appropriate to the skills, knowledge and experience of the student.

- The student should complete an ethics application form in consultation with the supervisor and submit the form to the departmental ethics officer for approval, making any required amendments. Approval will be confirmed by email and a record of the application and outcome will be logged by the ethics committee secretary.
- If the project is deemed to be sensitive or the research is otherwise potentially risky to either the student or participants, then further ethical consideration will be required. The departmental ethics officer will advise either: 1. to pass the application to the Committee Chair to give approval on the basis of the proposal, or 2. to refer the application to the Ethics Committee.
- Research that warrants further ethical consideration may involve projects in which the researcher's own safety requires careful assessment; and/or projects involving people in sensitive categories, such as those:
  - Who may not be able to give fully informed consent (e.g. children, elderly people);
  - Whose participation may not be fully voluntary (e.g. institutionalised individuals);
  - Who may be vulnerable to harm inflicted by the research (e.g. people who have been abused or who have had other disturbing experiences).

  This list is not exhaustive and the supervisor is encouraged to consult the departmental ethics officer about individual cases.

Compliance with ethical requirements outside of University of Exeter

Research conducted abroad
Universal ethical principles state that you should comply with the ethical procedures in the country in which you are researching. In many cases (e.g. States) this means complying with UK procedures (so making an application through the SSIS Ethics Committee) and carrying the certificate with you. In other countries (e.g. Germany), for certain types of research (e.g. in scientific facilities), you have to apply to the relevant ethics committee in that country. Other countries have no formal procedure at all. Like all UK committees, the SSIS Ethics committee covers research conducted in the UK. If you are researching abroad, the onus is on you to investigate and comply with the ethical criteria in that country.

Sampling NHS staff or patients
The NHS has its own ethics application procedure which covers research with samples recruited from NHS patients and staff through NHS sources. It is a long procedure, so allow 9-12 months from the start of research to complete this and to apply for separate research approval (site-specific) from the relevant hospital Trust or body. If the health professional is not recruited through the NHS source, and holds another title (e.g. academic), then NHS approval would not necessarily be needed. For projects involving NHS staff, the committee should be informed of the project.

Serving military and MOD staff
Any research which involves currently serving military or MOD personnel or their dependants will require MODREC review or evidence of exemption.

Guidelines for filling the form
Full and detailed guidelines are given in each field of the application form. You should read this before completing the form, then overtype your own text for your submission. If you are unsure how to fill out the form, you can contact your departmental ethics representative on the committee. PhD students should discuss the ethics application with their supervisor and should only submit an application with the supervisor's approval. Taught masters and undergraduate students – see specific notes and procedure above.

Certification and supervisor approval
Ensure you fully complete the 'administration' parts of the form, including checking the certification box. If you are a student your application will only be considered if you have included evidence of your supervisor's approval to submit with your application.

Synopsis of the research project
This should contain: a brief description of the project (including background and main research questions) and a detailed description of the methods (design, sampling, procedure, how recruiting). The key is to provide enough detail so the ethical issues can be assessed; language used should be clear and accessible to people outside of your discipline or specialism.

International Research
If your research will take place within the UK you may skip this question UNLESS your participants are in another country (even if you will not travel there). This includes EG Skype, email or telephone contact with participants. If you make an assertion regarding ethical requirements in another country you should provide some evidence to support it.

Research Methods
Set out clearly the methods you will use in language that is clear and accessible; your application will be assessed by people who may not be familiar with methods used in your discipline. Do not overly cite the literature; this aim is to explain what you will do, with whom and where. Be specific, clearly differentiating between different methods or groups and set out each element separately.

Participants
Who will you be seeking to involve? How many? Where are they from? How will you recruit them? Do they have characteristics which may mean they are vulnerable? Will you be offering any incentives?

The voluntary nature of participation
You should detail here how participants will be recruited (advert, online, through contacts) and how consent will be obtained. Consent should cover:
a) confidentiality,
b) anonymity
c) information about the project (see next section) and
d) the right to withdraw at any time without disadvantage to the participant.

You can use the standard form on the website or adapt this to your own needs (e.g. for oral history where the data will be held in an archive).

Written consent is always preferred, and is expected by many participants. It provides written evidence that the person voluntarily consented for both you and them. You and the participant should sign two copies of the form. Retain one form yourself and give the other to them.

If the consent form is to be provided in a language other than English copies of both should be included. In your application you will need to confirm that document translations have been done by a competent person with no significant changes to the original meaning.

If written consent is not possible (e.g. very culturally insensitive) then this should be justified and full details of the oral consent procedure given including a script of the words you will use.

If people are being observed as part of a participant observation, or online, you must consider
a) accessibility: to what extent they would reasonably expect to be observed (is it a public space, or a private chatroom?) and
b) how private they perceive the event/place (do they expect their discussions to be repeated outside?).

It is usual when observing conferences, for example, to obtain the permission of the organiser but not individual participants. Pretending to be someone else in cyberspace is usually considered unethical, however, deception can sometimes be justified if participants are informed later on, and given the opportunity to withdraw (King, 1996).

The informed nature of participation
Participants need to know what the project is about and what any risks or benefits of participating might be. This is usually done by writing an information sheet (a standard information sheet is available to download). The language used to explain your project must be appropriate to its intended audience.

In the rare cases that an information sheet is not appropriate (e.g. oral consent is given), justify this and explain how participants will be able to contact you for further details or to withdraw from the study.

If the information sheet is to be provided in a language other than English copies of both should be included. In your application you will need to confirm that document translations have been done by a competent person with no significant changes to the original meaning.

Assessment of possible harm
Assessment of possible harm covers both harm to participants, and harm to you the researcher. Participants could potentially be harmed:

- psychologically, for example, if they get distressed or an interview provokes earlier trauma
- legally, politically or economically, for example, if confidential information from the interview was shared or if their anonymity were compromised without consent, or their employer felt it didn't represent their organisation, or the police felt the material to be criminal
- physically, for example, interviewing where there is a power differential (e.g. women in domestic violence situations, political prisoners, in regimes with punitive measures for talking to researchers, taking part in new clinical drugs testing).

You do not need to exaggerate the potential harm to participants. You need to think through how you will ensure that your project adheres to the principle of 'do no harm' and to identify measures you will take to mitigate any potential harm.

Researcher safety is important, particularly where working alone (e.g. interviewing in people's homes), with vulnerable people (children, prisoners, mentally ill, in situations of conflict, women researchers in cultures which have traditional roles for women) or in countries with known risks (e.g. war zones, terrorism). Your research should be designed to minimise these risks (e.g. by meeting interviewees in

public places rather than private homes). Risks which are unavoidable need to be justified and you will need to write down your plan for managing them. For example, a PhD researcher researching alone might provide their supervisor with an email before a home visit with details of where they are going and arrange to call them within a specified time frame following the visit; it should be made clear what will happen if the call is not made as planned.

A researcher visiting a country with known risks must state how such risks will be avoided or minimised, confirming they will keep up to date and comply with Foreign and Commonwealth Office (FCO) travel advice and take UoE travel insurance. Researchers in countries which may be dangerous need to gain local knowledge (e.g. from other researchers in the same area) and visit governmental updated websites when in situ to assess risk (as well as using their common sense). Where FCO advises against 'all but essential' travel it should be noted that research is not sufficient justification and is not 'essential'.

Illegal Activities: where there is potential for the observation of illegal activities (or planning of illegal activities) you need to acknowledge this, showing how you will manage it within UK law and, if applicable, the law of the country in which the research is taking place.

Data Protection and Storage

Describe how and where you will collect and store your data and for how long. In general you should only ever use password encrypted devices and upload to the University U drive at the earliest possible opportunity. You may use One Drive or Sharepoint. University of Exeter IT do not support and recommend against the use of other file sharing software such as Dropbox. If using unsupported software you must ensure the version you use is GDPR compliant (usually this means using a paid rather than free version) and you are should seek advice from Exeter IT before doing so.

GDPR

Before submitting your application you should check UoE guidance which can be found here: http://www.exeter.ac.uk/cgr/researchethics/secure/gdprforresearchers/

Specifically you should review the section 'Conditions for processing personal data in research and consent' which includes links to GDPR compliant Information and consent sheets and data privacy notice for research.

The Committee generally prefers anonymity by default IE participants should only be potentially identifiable if there is compelling justification.

You need to state how long your data will be kept and whether you will *anonymise* it (there is no possible way any participant can be identified even by compiling a range of information) or *pseudonymise* it (participants will be given a pseudonym or number which could be linked back to their identity using a key). Personal data include any identifying characteristics such as names, photograph or video images, or information relating to someone's occupation or location from which their identity could be inferred. Sensitive personal data (gender, ethnicity, medical information etc) is subject to particular legal safeguards. The key principle you should apply is that you will only collect the minimum of personal or sensitive data absolutely necessary to your research (if age is not relevant to your study do not ask participants to say how old they are).

You should include details of if and how participants' identities will be protected and how the security of the data will be guaranteed, including where and how it will be stored, and how long it will be held for. You must include this on the information sheet.

Extensive information about data management including UoE policies can be found at http://www.exeter.ac.uk/research/toolkit/managing/data/storage/ For further information please also visit the Information Governance pages at http://www.exeter.ac.uk/ig/

Declaration of interests
A conflict of interests does not only arise if you have a commercial motive for research, it can also arise if your job title, position in life or source of funding might affect your impartiality in relation to participants (e.g. if you are a Christian minister researching non-Christian faiths, you are funded by a charity with a particular aid agenda). The solution is to inform participants if this is the case, let them know who your funders are, how and what the research will be used for, and how and where the results may be published.

User engagement and feedback
It is becoming more usual to include participants in the design, executing and reporting on their own study. Some researchers engage in highly reflexive processes with participants reviewing their own transcripts and feeding back their thoughts on published work. However, be realistic: it can be time-consuming to go back to every participant and let them review their work and not all projects require this. Also, if you have used oral consent, consider how your participants can find out about the outcomes of the study.

Information and Consent forms
GDPR compliant templates can be found at
http://www.exeter.ac.uk/cgr/researchethics/secure/templates/

Ensure that these forms are presented in a way that is accessible to your intended participants. Formatting and language should be clear. Academic language and references are to be avoided unless particularly relevant to the audience. Sufficient information should be given to allow potential participants to make an informed choice based on a full understanding of any possible consequences of their participation.

If translations are to be used, these should be included with the application.

In the exceptional circumstances that oral consent can be justified a script should be provided.

Do not use your own personal phone number or email address as a contact point for participants.

Queries
Queries around the process: please email ssis-ethics@exeter.ac.uk.

Queries regarding content of your application: please contact your departmental representative in the first instance; if you cannot resolve the matter, you may contact one of the Co-Chairs of the Committee for further advice.

Contact details can be found at http://intranet.exeter.ac.uk/socialsciences/ethics/