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COLLEGE OF SOCIAL SCIENCES AND INTERNATIONAL STUDIES

When completing this form please remember that the purpose of the document is to clearly explain the ethical considerations of the research being undertaken. As a generic form it has been constructed to cover a wide-range of different projects so some sections may not seem relevant to you. Please include the information which addresses any ethical considerations for your particular project which will be needed by the SSIS Ethics Committee to approve your proposal.

Guidance on all aspects of the SSIS Ethics application process can be found on the SSIS intranet:

Staff: <https://intranet.exeter.ac.uk/socialsciences/staff/research/researchenvironmentandpolicies/ethics/>

Students: <http://intranet.exeter.ac.uk/socialsciences/student/postgraduateresearch/ethicsapprovalforyouresearch/>

All staff and students within SSIS should use this form to apply for ethical approval and then send it to one of the following email addresses:

ssis-ethics@exeter.ac.uk This email should be used by staff and students in Egenis, the Institute for Arab and Islamic Studies, Law, Politics, the Strategy & Security Institute, and Sociology, Philosophy, Anthropology.

ssis-gseethics@exeter.ac.uk This email should be used by staff and students in the Graduate School of Education.

Applicant details	
Name	Example Ethics Application
Department	Law
UoE email address	xxxxxx@exeter.ac.uk

Duration for which permission is required		
You should request approval for the entire period of your research activity. The start date should be at least one month from the date that you submit this form. Students should use the anticipated date of completion of their course as the end date of their work. Please note that <u>retrospective ethical approval will never be given.</u>		
Start date:30/06/2016	End date:15/11/2018	Date submitted:19/05/2016

Students only	
All students must discuss their research intentions with their supervisor/tutor prior to submitting an application for ethical approval. The discussion may be face to face or via email.	
Prior to submitting your application in its final form to the SSIS Ethics Committee it should be approved by your first and second supervisor / dissertation supervisor/tutor. You should submit evidence of their approval with your application, e.g. a copy of their email approval.	
Student number	XXXXXXXXXX
Programme of study	Doctor of Philosophy (PhD)

	If you selected 'other' from the list above please name your programme here
Name of Supervisor(s)/tutors or Dissertation Tutor	Prof XXXXXXXX
Have you attended any ethics training that is available to students?	Select from this dropdown list Click here to specify training Click here to enter a date.

Certification for all submissions

I hereby certify that I will abide by the details given in this application and that I undertake in my research to respect the dignity and privacy of those participating in this research. I confirm that if my research should change radically I will complete a further ethics proposal form.

Name of Applicant

Double click this box to confirm certification

Submission of this ethics proposal form confirms your acceptance of the above.

TITLE OF YOUR PROJECT

Reconsidering the legal disconnect between financial and child arrangements on separation: Is caring compatible with sharing?

ETHICAL REVIEW BY AN EXTERNAL COMMITTEE

No, my research is not funded by, or doesn't use data from, either the NHS or Ministry of Defence.

If you selected yes from the list above you should apply for ethics approval from the appropriate organisation (the NHS Health Research Authority or the Ministry of Defence Research Ethics Committee). You do not need to complete this form, but you must inform the [Ethics Secretary](#) of your project and your submission to an external committee.

MENTAL CAPACITY ACT 2005

No, my project does not involve participants aged 16 or over who are unable to give informed consent (e.g. people with learning disabilities)

If you selected yes from the list above you should apply for ethics approval from the NHS Health Research Authority. You do not need to complete this form, but you must inform the [Ethics Secretary](#) of your project and your submission to an external committee.

SYNOPSIS OF THE RESEARCH PROJECT

Maximum of 750 words.

The separation between payment of child maintenance by parents and time with children is a core principle of family law policy and practice. In 2011, the Family Justice Review concluded that 'it would in our view be wrong to risk strengthening the view that it is acceptable not to pay maintenance when there are contact difficulties or for that matter, that contact can be withheld when maintenance is not being paid.'¹ In practice, Resolution, an association of 6,500 family lawyers, advocates a complete separation between adult financial arrangements on divorce and the arrangements for children.

¹ Ministry of Justice, Department of Education and the Welsh Government, *Family Justice Review: Final Report* (2011), 4.161

There are good doctrinal reasons to maintain this separation. However, this thesis asks whether, the time has come to reconsider it. Research demonstrates that caring responsibilities have an impact on earning capacity. Further, caring remains a gendered activity in intact families, which has implications for the relative financial position of mothers and fathers following separation.

This research aims to answer the following research questions:

1. How do parents take caring responsibilities into account when reaching financial settlements on relationship breakdown?
 - a. Do parents weigh economic and caring contributions during a relationship differently?
 - b. Do parents draw a connection between financial settlements and the arrangements for children at the point of relationship breakdown?
2. What impact do the approaches of different jurisdictions to caring responsibilities have on financial outcomes when couples separate?
 - a. How do different jurisdictions deal with the distribution of care work between parents during the relationship?
 - b. How does this fit with the way that property and the arrangements for children are dealt with on relationship breakdown in those jurisdictions?
3. Is there a need for reform of the law in England and Wales?
 - a. Is there any desire for reform?
 - b. Does an evaluation of the findings otherwise suggest a need for reform?
 - c. Do other jurisdictions offer possibilities for reform?

The research will involve empirical elements to answer these questions:

A. Interviews with parents in England and Wales

Family law has always encouraged parents to reach their own arrangements following separation. However, the removal of legal aid from most private family law cases means that many will now have to do so without access to legal advice. In order to understand what factors influence the arrangements reached by parents, it is necessary to speak with them directly. Reported case law, and increasingly the experiences of solicitors, will not necessarily reflect the principles that influence both financial and childcare arrangements.

B. Interviews with legal professional in the Netherlands and Sweden

The Netherlands and Sweden have been chosen as comparators because they each take a different approach to balancing work and family life from the more gendered division of care in England and Wales, where the predominant pattern, even where both parents work, is still the father as the main, typically full time, breadwinner, and the mother as the primary caregiver who typically works part time. Sweden is described as having a 'gender participation model'², which promotes gender equality whilst recognising gender difference. In contrast, the Netherlands has '[g]ender equality based on a women's model of equality'³ where all workers are encouraged to work part-time. However, in practice, mothers primarily work part-time and fathers continue to work full-time.

Language limitations and logistical challenges would make it impractical to try and interview parents in these jurisdictions in the same way as in England and Wales. Practitioners will have an overview of both how the system works and a range of different client experiences, in systems where there have not been such extreme moves to private ordering in recent years. Semi-structured interviews, which allow for

² Jacqueline Scott and Shirley Dex, 'Paid and Unpaid Work' in Jo in Jo Miles and Rebecca Probert (eds) *Sharing Lives, Dividing Assets* (Hart, 2009), 51

³ Jacqueline Scott and Shirley Dex, 'Paid and Unpaid Work' in Jo in Jo Miles and Rebecca Probert (eds) *Sharing Lives, Dividing Assets* (Hart, 2009), 51

interviewees to share their experiences, will therefore provide a broad overview which can be used as the basis for a comparison.

INTERNATIONAL RESEARCH

It is intended that this research will involve a mixture of face to face and telephone interviews, as necessary, with practitioners in the Netherlands and in Sweden. Both countries are EU Member States so I intend to abide by the RESPECT Code of Practice for Socio-Economic Research when carrying out these interviews.

Like the UK, Sweden and the Netherlands are bound by European Directive 95/46/CE 'on the protection of individuals with regard to the processing of personal data and on the free movement of such data'. The Data Protection Act 1998 implemented this Directive in the law of England and Wales and I will comply with its provisions.

Given these precautions and the fact that my research is primarily UK based, I do not intend to make applications to Research Ethics Committees within Sweden or the Netherlands.

The following sections require an assessment of possible ethical consideration in your research project. If particular sections do not seem relevant to your project please indicate this and clarify why.

RESEARCH METHODS

This research will consist of:

1. Semi-structured interviews (a mixture of face to face and telephone interviews) with parents in this jurisdiction ; and
2. Semi-structured interviews (a mixture of face to face and telephone interviews) with legal practitioners in Sweden and the Netherlands

Characteristics of sample

I aim to interview 15 fathers and 15 mothers (these fathers and mothers would be independent of one another and not both parents of the same children). Ideally I would like these parents to have the following characteristics:

- They must have been separated for at least 12 months – in the immediate aftermath of separation parents are likely to be more emotionally vulnerable. Further, this will allow time for both financial and childcare arrangements to have settled down.
- They must have arrangements in place to deal with their finances and the arrangements for their children.
- They are not currently involved in court proceedings or expected to be within the next 6 months – whilst I would want to speak with parents who have been through the court process in the past I would not aim to recruit those who are currently engaged in litigation. Not only is this likely to indicate that there is dissatisfaction with the arrangements but the stress associated with the process is likely to make interviewees more vulnerable.

I would ideally like to interview both divorced parents and former cohabitants. Whereas married individuals have a wide range of financial claims open to them on divorce, cohabiting couples have no ability to make financial claims outside of the law of trusts. I am interested in

the extent to which this affects both the division of care during the course of the relationship and the factors influencing the arrangements reached on separation.

I would also like to interview parents from a range of socio-economic backgrounds. Where parents have more than enough money to meet their basic needs it may well be that their immediate concerns and the factors that influence the settlements they reach are different from those of parents who cannot even meet their basic needs.

For further information about recruitment, please see the section on the voluntary nature of participation below.

Expected outputs

At this stage, I would hope for the outputs of this project to include the following:

- Conference presentations
- Journal articles (both academic and practitioner)
- Presentations to professionals (e.g. through Resolution)

Discussion of sensitive topics

For individual participants, separation can be a sensitive topic. Please see the section on possible harm below for discussion of how I intend to minimise harm to participants.

PARTICIPANTS

I intend to speak to around 30 parents (ideally around 15 fathers and 15 mothers). I will offer a £10- £15 Amazon voucher to parents as an incentive to take part. I hope this will appeal to the broadest range of parents possible, but the amount is not enough that it would create an undue influence to participate.

My aim is to speak to around 5 specialist family legal practitioners in Sweden and the same number in the Netherlands. I do not intend to offer any financial incentive for these participants.

THE VOLUNTARY NATURE OF PARTICIPATION

I am likely to have to use a range of methods to recruit parents with the appropriate characteristics indicated above. I anticipate these will include:

- Through legal professionals
- Online adverts – I will target websites such as familylawweek.co.uk, wikivorce, onlymums.org, onlydads.org and spanuk.org.uk
- Leaflets at mediation providers and citizens advice bureaux

I intend to recruit legal professionals in Sweden and the Netherlands through the following channels:

- The International Academy of Matrimonial Lawyers: both by exploring the possibility of an email from the organisation and by direct approach to lawyers in these jurisdictions listed in their online directory
- The International Society of Family Law

- Through known professional networks of English legal professionals who have experience of international cases.

If emailing, I will use my university email address, to preserve confidentiality and to distinguish my professional and academic roles (see further below).

I will seek written consent from participants and sample information and consent forms are below.

The interviews will be anonymised and confidentiality will be preserved. Participation will also be voluntary.

At the start of interviews I will ask participants whether they agree to me recording the session and explain to them that they can stop the recording at any point during the session. The interviews will be anonymised and confidential.

Participants will be able to withdraw from the research at any time. The information sheets emphasise that all participation is voluntary and consent can be withdrawn at any time.

SPECIAL ARRANGEMENTS

Not applicable

THE INFORMED NATURE OF PARTICIPATION

The sample consent forms attached include information about the nature of the project that I will give to participants. I will summarise the key points at the start of each interview. If participants raise any questions (whether at that stage or before or after the interview) then I will answer them.

ASSESSMENT OF POSSIBLE HARM

Interviews with parents

In relation to lay participants, I will be asking people to tell me about the arrangements they reached in relation to their children and their finances on separation. Separation is a very emotional time for people and it is likely that some participants will find it upsetting to discuss these topics. For this reason, I will have details of counsellors and support organisations that I can refer people to if appropriate.

All interviewees will be promised confidentiality. Their identities will be anonymised and pseudonyms assigned prior to transcription. Identities and any distinguishing characteristics indicated in the interview will be omitted from the interview transcript to ensure that participants cannot be identified from the text.

I formerly worked as a solicitor in practice, and still undertake occasional work on a consultancy basis, so I am used to dealing with clients who are emotional. I have found in practice that when clients become upset it can be useful to move on to another topic or offer to pause or stop the interview. I will draw on this experience when interviewing parents. I will also make sure that interviewees know they do not have to answer any question they do not want to and that they can withdraw at any time.

Interviews with legal professionals

In relation to professional participants, there is less risk of psychological harm. There is a risk of damage to their professional reputation if they accidentally breach client confidentiality whilst speaking to me or through their views on my research topic being made public. Lawyers are used to protecting their clients' confidentiality but I will manage the risk by not identifying the professionals (or their clients) by name.

The risk of being a lone researcher

I am likely to face difficulties in identifying lay participants to speak to and I am going to have to be willing to be flexible about where I meet people to secure interviews. This may, for example, involve interviewing people in their homes. Although I am used to meeting with clients alone I will manage the risk of being a lone researcher as follows:

1. Ensuring that my supervisor knows the name and address of the person I am going to interview and that a family member knows the approximate location and that my supervisor will have the full details (this will balance the need to keep the participants' identity confidential and my own safety).
2. Emailing my supervisor and contacting a friend or family member before I go into the interview and when I leave.
3. Ensuring that either a friend, family member or my supervisor (I will agree with one of these people in advance depending on who is available):
 - Calls me on my mobile if they have not heard from me after 2.5 hours from my initial call.
 - If I do not answer that call, calls me again 30 minutes later; and
 - If I do not answer that second call, calls the police.

In the event that interviews with professionals take place overseas, I will take steps to manage the risk to myself as a lone researcher by ensuring that I have done some background research into the professional in question. For example, I will check their name against the IAML directory, their firm website and / or some other professional directory. I will also follow the steps set out above when interviewing professional participants in person.

DATA PROTECTION AND STORAGE

I will only capture confidential information about participants on their consent forms and will not record any personal information about participants on tape at the start of the interview.

Following the interview, I will assign the participants aliases. I will record pseudonyms and actual names on a password protected spreadsheet that will be uploaded onto u drive. I will only store this document on u drive and not on my home computer or any portable devices.

Participants' spouses and children will be referred to in transcripts as 'spouse' or 'son, daughter, child'. Further, details such as place names or professions, may be changed to ensure anonymity if it appears that these may aid identification of participants.

My consent form explains how data will be stored and contains written privacy notice:

- Consent forms will be scanned and uploaded into a separate file on u drive from the password protected spreadsheet and the original forms will be confidentially shredded.

- Digital recordings will be deleted as soon as I have an authoritative transcript of the interview or focus group.
- I will ensure that any analysis of the data which is not stored on u drive only uses the aliases.
- Data that includes confidential details (including contact details) may be kept for up to 5 years so that, if necessary, I can contact participants during my PhD. It will be destroyed as soon as my PhD is awarded.
- Anonymised data may be stored indefinitely.
- Anonymised data may be uploaded to the UK Data Service in accordance with ESRC requirements.

Data will be kept confidential unless for some reason I am required to produce it by law or something in the interview causes me concern about potential harm to participants. In the case of the latter, I will first discuss with my supervisor what, if any, further action to take.

If I am able to secure funding to have interviews transcribed then I will brief the transcriber on the need to remove any identifying details and will explain to the transcriber what I mean by this (for example, names of participants).

DECLARATION OF INTERESTS

My PhD is funded by the ESRC. This is explained on my information sheet.

My information sheet will also explain that I am a solicitor but that I will not be acting in a professional capacity when conducting the research. When I conducted my MRes research it was clear that some participants (particularly those who were critical of the legal system) viewed this as relevant. Given that it may affect someone's decision about whether or not to participate, it is important that this is made clear.

The other relevant aspect of being a solicitor is the risk of inadvertently becoming subject to professional duties of care. If participants reveal to me an issue that I believe suggests a need for legal advice then I cannot provide that advice myself. Not only would it affect the nature of the research relationship, but there is a professional risk to me of advising in a situation where I may not be insured. If this situation arises then I will discuss it with my supervisor following the interview. If appropriate, I would then contact the participant in question, explain the perceived need for advice and direct them to the Resolution website which would allow them to search for family lawyers near them.

USER ENGAGEMENT AND FEEDBACK

Given the practicalities of participant review of oral transcripts, this approach is not intended. Participants will, however, be able to request a copy of their own interview transcript (see information sheet).

A summary of key findings will be prepared for participants once the research is concluded.

INFORMATION SHEET

I intend to provide both parents and legal professionals with a combined information and consent form. This section contains an example of the form I will use for parents. The consent form section below contains an example of the form that I will use for professionals.

Parent consent form

INFORMATION AND CONSENT FORM

RECONSIDERING THE LEGAL DISCONNECT BETWEEN FINANCIAL AND CHILD ARRANGEMENTS ON SEPARATION: IS CARING COMPATIBLE WITH SHARING?

1. What is this project?

This project aims to understand how parents divide financial and childcare responsibilities after they separate. It also aims to understand why parents reach the arrangements they do and what factors influence their decisions. In particular, it aims to understand how influential past patterns of childcare and breadwinning responsibilities are on these decisions. Additionally, this research aims to find out whether there is a link between childcare arrangements and the financial settlements parents reach on separation.

2. Who is conducting this research?

I am a PhD student at the University of Exeter and this research forms part of my PhD. My supervisor is Professor xxxxxx– xxxxx@exeter.ac.uk. This research is funded by the Economic and Social Research Council (ESRC).

I also undertake occasional work as a solicitor but I am conducting this research as a PhD student and will not be able to offer legal advice.

3. What does being part of this study mean for me?

It will involve one interview, either face to face or by telephone, which is likely to last around an hour. I would like to record this interview with your permission.

You can stop the interview at any time and you do not need to answer any questions that you do not wish to answer.

Sections of the transcript of your interview may be published, either in journal articles or elsewhere, following this research. Your real name and the real names of your spouse and children will not be used.

You will receive a £10 Amazon voucher for taking part.

4. Who can I contact for further information?

For further information about the research or your interview data, please contact:

Name of applicant
Law School
University of Exeter
Amory Building
Rennes Drive

Exeter
EX4 4RJ
UK

xxxxxx@exeter.ac.uk

If you have concerns/questions about the research you would like to discuss with someone else at the University, please contact:

Name of Supervisor

Law School
University of Exeter
Amory Building
Rennes Drive
Exeter
EX4 4RJ
UK

xxxxxx@exeter.ac.uk

(+44)(0)1392 xxxxxx

Further advice and support on these issues can be obtained from:

- British Association for Counselling and Psychotherapy (<http://www.bacp.co.uk/>)
- Parent Connection (<http://theparentconnection.org.uk/pages/is-this-for-me>)
- Relate (Relate.org.uk)
- Resolution (<http://www.resolution.org.uk/>)

5. What will happen to my interview data?

Your interview data will be held in accordance with the Data Protection Act.

The information you provide will be used for research purposes and your personal data will be processed in accordance with current data protection legislation and the University's notification lodged at the Information Commissioner's Office. Your personal data will be treated in the strictest confidence and will not be disclosed to any unauthorised third parties. The results of the research will be published in anonymised form and anonymised data may be uploaded to the UK Data Service in accordance with ESRC requirements.

a. Interview recordings

The digital recording of your interview will be deleted as soon as there is an authoritative written transcript of your interview.

b. Interview transcripts and contact details

Interview data will be held and used on an anonymous basis, with no mention of your name, but we will refer to the group of which you are a member.

Your personal and contact details will be stored separately from your interview transcript and may be retained for up to 5 years.

If you request it, you will be supplied with a copy of *your* interview transcript so that you can comment on and edit it as you see fit (please give your email below).

Third parties will not be allowed access to interview tapes and transcripts except as required by law or in the event that something disclosed during the interview causes concerns about possible harm to you or to someone else.

CONSENT

I have been fully informed about the aims and purposes of the project.

I understand that:

- there is no compulsion for me to participate in this research project and, if I do choose to participate, I may withdraw at any stage;
- I have the right to refuse permission for the publication of any information about me;
- any information which I give will be used solely for the purposes of this research project, which may include publications or academic conference or seminar presentations;
- all information I give will be treated as confidential;
- the researcher will make every effort to preserve my anonymity.

.....
(Signature of participant)

.....
(Date)

.....
(Printed name of participant)

.....
(Email address of participant if they have requested to view a copy of the interview transcript.)

.....
(Signature of researcher)

.....
(Printed name of researcher)

One copy of this form will be kept by the participant; a second copy will be kept by the researcher(s).

Your contact details are kept separately from your interview data.

CONSENT FORM

INFORMATION AND CONSENT FORM

RECONSIDERING THE LEGAL DISCONNECT BETWEEN FINANCIAL AND CHILD ARRANGEMENTS ON SEPARATION: IS CARING COMPATIBLE WITH SHARING?

1. What is this project?

This project aims to understand how parents divide financial and childcare responsibilities after they separate. It also aims to understand why parents reach the arrangement they do and what factors influence their decisions.

This research also aims to understand:

- a. How childcare and breadwinning responsibilities are divided between parents during relationships and the impact that this has when they separate; and
- b. How satisfactory legal professionals consider this to be.

2. Who is conducting this research?

I am a PhD student at the University of Exeter and this research forms part of my PhD. My supervisor is Professor xxxxxxxx– xxxxxx@exeter.ac.uk. It is funded by the Economic and Social Research Council (ESRC).

I also undertake occasional work as a solicitor but I am conducting this research as a PhD student.

3. What does being part of this study mean for me?

It will involve one interview, either face to face or by telephone, which is likely to last around an hour. I would like to record this interview with your permission.

You can stop the interview at any time and you do not need to answer any questions that you do not wish to answer.

Sections of the transcript of your interview may be published, either in journal articles or elsewhere, following this research. Your real name will not be used.

4. Who can I contact for further information?

For further information about the research or your interview data, please contact:

Name of Applicant
Law School
University of Exeter
Amory Building
Rennes Drive
Exeter
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UK

xxxxxx@exeter.ac.uk

If you have concerns/questions about the research you would like to discuss with someone else at the University, please contact:

Name of Supervisor

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(+44)(0)1392 xxxxxx

5. What will happen to my interview data?

Your interview data will be held in accordance with the Data Protection Act.

The information you provide will be used for research purposes and your personal data will be processed in accordance with current data protection legislation and the University's notification lodged at the Information Commissioner's Office. Your personal data will be treated in the strictest confidence and will not be disclosed to any unauthorised third parties. The results of the research will be published in anonymised form and anonymised data may be uploaded to the UK Data Service in accordance with ESRC requirements.

a. Interview recordings

The digital recording of your interview will be deleted as soon as there is an authoritative written transcript of your interview.

b. Interview transcripts and contact details

Interview data will be held and used on an anonymous basis, with no mention of your name, but we will refer to the group of which you are a member.

Your personal and contact details will be stored separately from your interview transcript and may be retained for up to 5 years.

If you request it, you will be supplied with a copy of *your* interview transcript so that you can comment on and edit it as you see fit (please give your email below).

Third parties will not be allowed access to interview tapes and transcripts except as required by law or in the event that something disclosed during the interview causes concerns about possible harm to you or to someone else.

CONSENT

I have been fully informed about the aims and purposes of the project.

I understand that:

- there is no compulsion for me to participate in this research project and, if I do choose to participate, I may withdraw at any stage;
- I have the right to refuse permission for the publication of any information about me;
- any information which I give will be used solely for the purposes of this research project, which may include publications or academic conference or seminar presentations;
- all information I give will be treated as confidential;
- the researcher will make every effort to preserve my anonymity.

.....
(Signature of participant)

.....
(Date)

.....
(Printed name of participant)

.....
(Email address of participant if they have requested to view a copy of the interview transcript.)

.....
(Signature of researcher)

.....
(Printed name of researcher)

One copy of this form will be kept by the participant; a second copy will be kept by the researcher(s).
Your contact details are kept separately from your interview data.

SUBMISSION PROCEDURE

Staff and students should follow the procedure below.

Post Graduate Taught Students (Graduate School of Education): Please submit your completed application to your first supervisor. Please see the submission flowchart for further information on the process.

All other students should discuss their application with their supervisor(s) / dissertation tutor / tutor and gain their approval prior to submission. Students should submit evidence of approval with their application, e.g. a copy of the supervisors email approval.

All staff should submit their application to the appropriate email address below.

This application form and examples of your consent form, information sheet and translations of any documents which are not written in English should be submitted by email to the SSIS Ethics Secretary via one of the following email addresses:

ssis-ethics@exeter.ac.uk This email should be used by staff and students in Egenis, the Institute for Arab and Islamic Studies, Law, Politics, the Strategy & Security Institute, and Sociology, Philosophy, Anthropology.

ssis-gseethics@exeter.ac.uk This email should be used by staff and students in the Graduate School of Education.

Supervisor Approval:

Attach confirmation of supervisor approval here.