THE GLASGOW SCHOOL OF ART

Research & Knowledge Exchange Ethics Policy 2016

POLICY DETAILS:

Date of approval	25th October 2016
Approving body	Research & Knowledge Exchange Committee
Supersedes	2012 Research & Knowledge Exchange Policy
Date of EIA	March 2016 *(under review as of 1.11.16)*
Date of next review	Term 1 RKEC 2019
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Responsible Executive Group area	Research & Doctoral Studies
Related policies and documents	Health and Safety Policy Data Protection Policy Child Protection Policy Adult Protection Policy Equal Opportunities Statement Gifts and Hospitality Policy
Benchmarking	-

The Glasgow School Of Art
Research & Knowledge Exchange Ethics Policy

1. Introduction

1.1 The Glasgow School of Art (GSA) is committed to producing research and knowledge exchange that is of the utmost rigor and of the highest quality. It is recognised that an ethics policy can be an essential tool in maintaining quality and integrity in research. Furthermore, it is a requirement of almost all funding bodies that ethical considerations relating to all research and knowledge exchange activities are made explicit.

1.2 This policy relates to the School's academic, contract research, administrative, academic support staff, and research postgraduate students (MRes and PhD for the avoidance of doubt). It also applies to visiting researchers and those with honorary posts who carry out research within GSA. To avoid confusion, we will use the term 'researcher' throughout.

1.3 The GSA Research Ethics Policy should be read in conjunction with the GSA Research Ethics Code of Practice, both of which set out minimum standards all researchers must comply with in executing a programme of research activities.

1.4 Virtually all research undertaken will have ethical implications and as such, will be required to demonstrate that the ethical issues have been identified, considered and appropriate steps taken to address those issues identified.

2. Research & Knowledge Exchange

2.1 Research is defined as *a process of investigation leading to new insights, effectively shared* (REF2014, 02.2011, Annex C).

2.2 It includes work of direct relevance to the needs of commerce, industry and to the public and voluntary sectors; scholarship; the invention and generation of new ideas, images, performances, artifacts including design, where these lead to new or substantially improved insights; and the use of existing knowledge in experimental development to produce new or substantially improved materials, devices, products and process, including design and construction (REF2014, 02.2011, Annex C).

2.3 Work undertaken as part of professional practice and executed outwith contractual obligation to GSA is the responsibility of the practitioner. Work of this nature should naturally not be carried out on GSA premises.

2.4 The GSA research ethics policy also applies to pedagogic enquiry and interventions which are beyond the normal agreements for educational purposes between teacher, student and institution. This would constitute harm or distress beyond reasonable expectations as well as a disparity of power relationship.

2.5 The GSA research ethics policy also applies to any research work whose focus is knowledge exchange.

3. Obligations and Responsibility of the Researcher

3.1 All researchers must comply with the GSA Research Ethics Policy, as set out herein. In complying with the policy, the researcher recognises the need for sound ethical consideration in the proposed research undertaken and this implies, that the researcher has also undertaken an assessment of risk in proposing this research.

3.2 Researchers must also comply with the GSA Research Ethics Code of Practice and demonstrate adherence to its principles and recommendations in execution of research.

3.3 <u>It is the responsibility of the researcher to ensure that the appropriate ethical clearance, both within GSA and, if appropriate ,with other bodies, has been obtained</u>. Any researcher who fails to do so may be subject to GSA disciplinary procedures and / or be in breach of any legislation pertaining to the work (which could lead to criminal charges being brought).

3.4 Researchers must acquaint themselves with all relevant legislation relating to their research. This includes (but is not limited to), the Data Protection Act (2010), Freedom of Information Act (Scotland, 2002), the Equalities Act (2010), the Computer Misuse Act (1990), the Obscene Publications Act (1964) and all legislation governing working with participants unable to give informed consent, safeguarding children, welfare of animals, uses of human tissue and health and safety regulations. Further information on each can be viewed on the GSA Research Ethics toolkit on the VLE.[1]

3.5 In addition to legislation, researchers must be familiar with relevant GSA policies which are not the preserve of the Research and Doctoral Studies but which nonetheless impact upon research activities, in particular the GSA Health and Safety Policy and Data Protection Policy. Abiding by each of these and any obligations therein is the responsibility of the researcher.

3.6 All Glasgow School of Art researchers must exhibit ethically sound behaviour in the execution of research as part of The Glasgow School of Art, including (but not limited to):

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[1] See www.legislation.gov.uk for up to date information

i) formally acknowledging the contribution and assistance of others (including collaborating partners, colleagues etc);

ii) honouring any contractual agreements, copyrights and the ownership of intellectual property and avoidance of any practice to mislead what is respect of what is presented;

iii) publishing (regardless of format / vehicle) research to the highest standards of academic integrity and representation;

iv) independence of research must be clear and any conflicts of interest or partiality must be explicitly declared by the researcher to GSA via the Research Ethics Subcommittee.

3.7 When conducting research work in collaboration with other institutions, researchers should act in accordance with agreements set out between the research parties, including complying with the rules, regulations and processes of partner organizations where specified. For example, research carried out on NHS premises and/or NHS patients is required to go through NHS ethical procedures laid out by the Department of Health.

4. Ethical issues

4.1 The following is a list of ethical issues this policy pertains to:

    a. Voluntary participation of research subjects;

    b. Respect for vulnerable persons, human dignity, free & informed consent;

    c. Full disclosure to research subjects (including the purpose of the research, length of time information will be kept for, the nature of its use, confidentiality & security thereof and right to withdraw from participation);

    d. Research free from coercion or deception (including incentives or covert research) paying due heed to the Bribery Act 2010;

    e. Support for research subjects / participants;

    f. Data Protection compliance (including confidentiality, security and destruction of data);

    g. Disclosure Scotland compliance (where required);

    h. Extent to which research could be met with reduced numbers of human subjects;

    i. Extent to which research will achieve its desired aims and not waste time of research subjects;

    j. Animal welfare;

    k. Use of animal or human tissue;

    l. Use of archives, datasets, databases, visual material (e.g photographic or video), internet or social media material;

    m. Harm : Benefit Analysis;

    n. Conflict of interest;

o. Conservation;

p. Professional integrity;

q. Adherence to GSA and any collaborating institutions / organisations ethical policies and procedures as well as local regulations;

r. Compliance with all legislation related to the research work.

4.2 All research conducted within GSA will incur one or more of the issues outlined above to a greater or lesser extent and requires ethical approval before the research can commence.

5. Research Ethics Subcommittee

5.1 The GSA Research Ethics Subcommittee (RES) is a subcommittee of the Research and Knowledge Exchange Committee (RKEC) and meets not less than once per academic year to define the institutions approach to research ethics, receiving an annual report on ethics applications made in the course of the academic year and discussing changes in the external environment that may necessitate changes to research ethics policy and procedures.

5.2 The GSA Research Ethics Subcommittee is convened by the Head of Research and Doctoral Studies and Doctoral Studies, and consists of two Senior Researchers and the Research Developer. Where subject specialist advice is required we will approach a well experienced researcher from that field from within the institution to offer a perspective. From time to time representatives from other areas of GSA (such as Human Resources, IT) may be called to participate as well as lay members from outwith GSA who have specialist expertise.

5.3 Members of the Committee are recognised as active researchers in their own right and therefore, will be submitting applications for ethical consideration. Where a conflict of interest arises, this will be managed by the Head of Research & Doctoral Studies.

5.4 The remit of the GSA Research Ethics Committee is:

to oversee questions of ethics as it refers to the development of research and knowledge exchange activities for GSA researchers.

5.5 To be responsible on behalf of the RKEC for:

i) Establishing and maintaining the research ethics policy;

ii) Establishing an ethics protocol and preliminary review sheet;

iii) Establishing and maintaining best practice on ethical issues in relationship to RCUK standards, NHS as well as other funders;

iv) Review, recommend and make decisions on any and all ethical issues as they may pertain to research and knowledge exchange activities by GSA researchers;

v) All reporting on matters arising during committee operation.

6. Procedures

6.1 Almost all research & knowledge exchange activities, regardless of nature or funder, are likely to incur an ethical dimension and therefore, are required to complete an ethics form to demonstrate that such ethical issues have been considered, identified and mitigated for. The procedure is thus:

6.1.1 All applicants must complete and submit to the Research Developer *Form 1: Preliminary Ethical Assessment Form* at the point of obtaining sign off for a proposed research project. A full copy of the research proposal should also be appended;

6.1.2 Based on the information supplied in Form 1, researchers will be informed normally within ten days whether there are ethical issues which require a full ethical assessment (in accordance with GSA protocol), requires external NHS approval or if Form 1 in itself provides sufficient information. In the latter instance, Form 1 will be signed off by the Research Developer and Head of Research and Doctoral Studies;

6.1.3 Full ethical approval with require the completion of Form 2: Full ethical assessment, a narrative based form designed to interrogate the finer details of the proposed research. Types of research likely (but not limited to) require full ethical assessment:
- working with under 16 year olds;
- research that might fall under The Counter-Terrorism and Security Act 2015[2] (CTSA) and related duty of public sector organisations, known as the 'prevent duty'. For clarity this could encompass i) research in a UK Foreign Office no go area; ii) extremism / radicalization; iii) publication of sensitive material that could incite extremism, radicalization or hate crime;
- participants that lack capacity in accordance with the Adults with Incapacity Act (2000) Scotland;
- research topics deemed as i) sensitive; ii) that could induce harm or distress beyond reasonable expectation; iii) where the safety or wellbeing of the researcher themselves could be in jeopardy;
- research where the use or generation of sensitive data forms part of the research. This also includes data which may be contextually innocuous to the research question but may be liable to misuse if made available to the general public.

6.1.4 Form 2: full ethical assessment forms and materials will be reviewed by at least one member of the GSA Research Ethics Subcommittee in addition to either the Research Developer or Head of Research and Doctoral Studies;

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[2] http://www.legislation.gov.uk/ukpga/2015/6/contents/enacted

6.1.5 Committee members will consider the application, make a decision and report the decision via the Research Developer to the applicant. The members may:

a) approve the application;

b) reject the application, stating reasons;

c) request further information or modifications to the application.

6.1.6 In the case of (C), in part 6.1.5 above, the revised application must be submitted through the same procedure.

6.1.7 In the case of research that falls under the Counter Terrorism Security Act (the prevent duty) in accordance with standard academic practice, researchers will be expected to conduct such research in a responsible manner that does not contravene this legislation. Committee members and the Research Developer will offer advice in this regard, consulting with the GSA Prevent Working Group for expertise where necessary.

6.2 Where research is undertaken in collaboration with another institution or organisation outside the School, the ethics policies of those institutions should be appended to Form 1 at the point of obtaining sign off to allow for due diligence. Web links to those policies are also acceptable;

6.3 All forms and documents relating to the GSA Research Ethics procedure can be found on the VLE within the 'Research and Knowledge Exchange' section which all staff are enrolled in. A flowchart of the process is included in Annex A herein.

6.4 In the instance of research falling into the remit of NHS Research Ethics approval, the Research Developer will assist researchers in the preparation of the application. The Research Developer will also need to receive proof of approval from a NHS Research Ethics Committee (REC) before research can begin.

7. Reporting

7.1 As stated, the Research Ethics Committee operates as a Subcommittee of the Research and Knowledge Exchange Committee and as such, the convenor of the Research Ethics Committee will give a short update at RKEC.

7.2 The Research Developer will report to REC on the number of preliminary research ethics checklist documents which have been submitted during the period between committee meetings and whether these are likely to require full ethical approval. In this manner,

workload and planning can be managed as well as ensuring the correct persons are present at future meetings.

7.3 Any reporting which is required on research ethics which could be either internal to GSA or external (e.g. Research Council requirements) will be the responsibility of REC. Where information is requested by REC of researchers, researchers will be informed as quickly as possible and should comply with all requests for information.
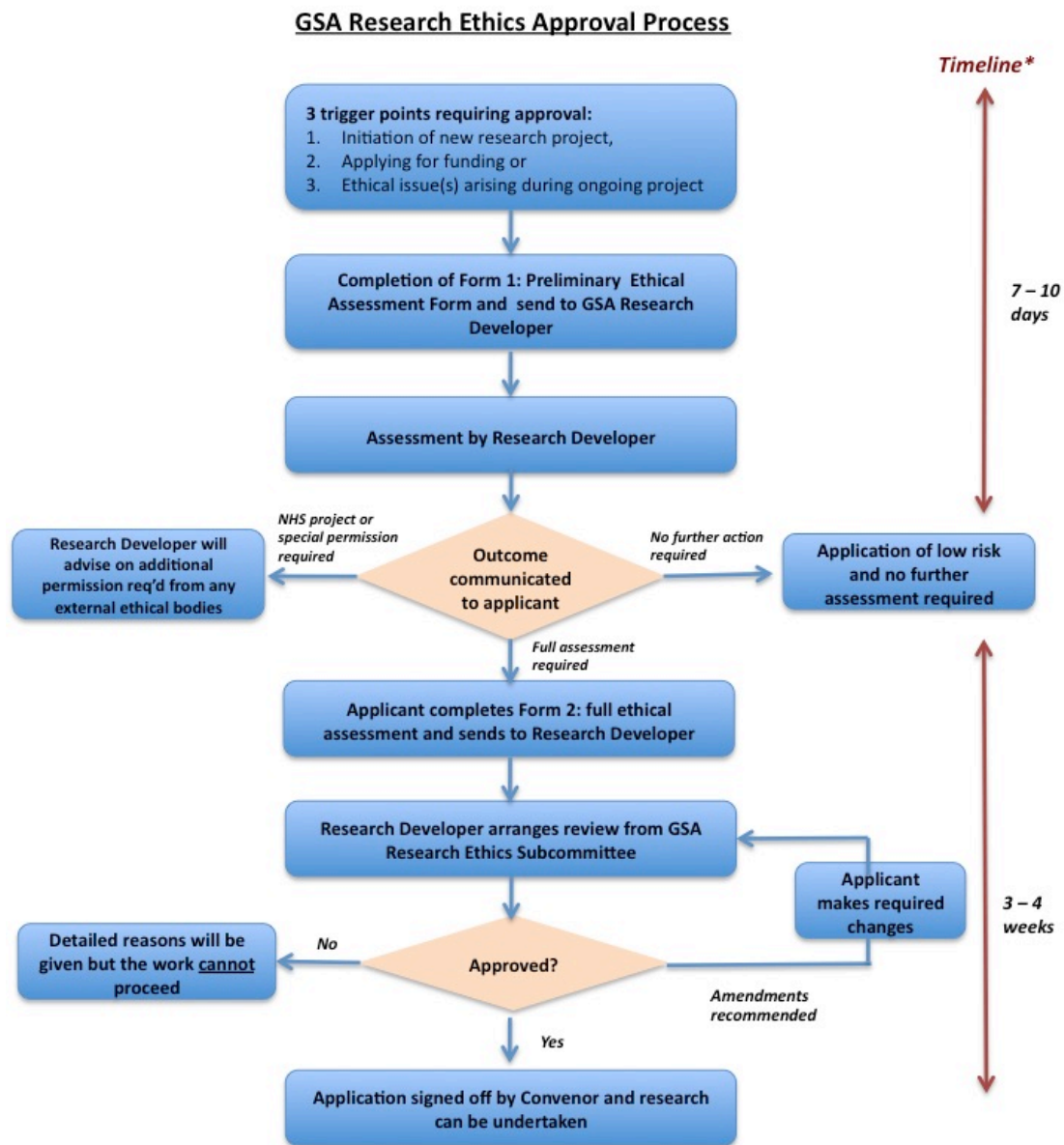
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References

In compiling the Research Ethics Policy, the author gratefully acknowledges the following documents

1. GSA Research Ethics Policy 2005
2. University of the Arts London, Code of Practice on Research Ethics
3. University of the Arts London, Guidance for Research Ethics Approval
4. University of Bristol, Ethics of Research Policy and Procedure
5. Oxford Brookes University, Ethics Review Process
6. Oxford Brookes University, What does it mean for me
7. Oxford Brookes University, University Research Ethics Committee (terms of reference)
8. Royal College of Art, Terms of Reference and Membership for the Research and Ethics Committee
9. Department of Health, Research Governance Framework for Health and Social Care, 2005
10. ESRC, Framework for Research Ethics
11. Policy on Conducting Sensitive Research, DeMontfort University 2016
12. Ethics and your research project, J Spencer (PhD student), Miriad Ethics Research Project, Manchester School of Art & Manchester Metropolitan University.
13. Counter Terrorism and Security Act 2015 – Good Practice Guide for Scottish Higher Education Institutions (prepared by the Higher Education Prevent Working Group, June 2015)

Annex A: Flowchart illustrating GSA Research Ethics Process

GSA Research Ethics Approval Process

Timeline*

3 trigger points requiring approval:
1. Initiation of new research project,
2. Applying for funding or
3. Ethical issue(s) arising during ongoing project

Completion of Form 1: Preliminary Ethical Assessment Form and send to GSA Research Developer

7 – 10 days

Assessment by Research Developer

NHS project or special permission required

Research Developer will advise on additional permission req'd from any external ethical bodies

No further action required

Outcome communicated to applicant

Application of low risk and no further assessment required

Full assessment required

Applicant completes Form 2: full ethical assessment and sends to Research Developer

Research Developer arranges review from GSA Research Ethics Subcommittee

Applicant makes required changes

3 – 4 weeks

No

Detailed reasons will be given but the work _cannot_ proceed

Approved?

Amendments recommended

Yes

Application signed off by Convenor and research can be undertaken

*This refers to how quickly we will aim to return a decision to applicants. Please get in touch as early as possible to help with scheduling, thank you.