THE GLASGOW SCHOOL OF ART

Undergraduate Ethics Policy, 2017

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Author	Dr Madeleine Sclater
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Benchmarking	

The Glasgow School of Art

Undergraduate Ethics Policy

1. Introduction

1.1 This policy document sets out GSA's policy on the ethical review of creative research activity and the presentation of practical work in a public setting associated with its taught undergraduate programmes. The Glasgow School of Art (GSA) is committed to providing the highest quality of support for all students in order to consider the ethical parameters of their work at all times and at all stages of their studies. An ethics policy is required to help protect all those involved in research (participants and the person carrying out the research, including viewers) from harm. It is also an essential document in helping to maintain quality in creative research activities.

1.2 Glasgow School of Art is committed to providing appropriately tailored staff development on a regular basis to enable staff to support undergraduate students to consider the ethical dimensions in their work. Specifically, Academic teaching staff will receive appropriate instruction and training on the UG ethics process, use of associated documentation and ethical issues to consider in creative practice research.

1.3 This policy relates only to students enrolled on undergraduate degree programmes. A separate PGT Ethics Policy is in operation for students enrolled on postgraduate taught programmes. GSA Staff and PhD/M.Res students should consult the GSA Research Ethics Policy.

1.4 This document should be read alongside the *GSA Research Ethics Code of Practice*. The guidance included in this policy assumes you have read the *GSA Research Ethics Code of Practice*. Both of these documents set out minimum

standards which all students and staff at GSA must follow when undertaking creative research activities.

1.5 Creative Practice research is becoming increasingly socially engaged. Ethical judgements within the creative disciplines are often multifaceted and require careful examination and considered within their context. Almost all kinds of creative research will have ethical implications, including the public presentation of practical work. Therefore, students will be required to attend and participate in designated ethics teaching sessions and briefings as part of their programme of study.

1.6 Additionally, when undertaking creative research, students will be required to show that the ethical issues have been identified, and appropriate steps taken to address any issues identified. This will require students who are undertaking self-directed projects involving human participants and the collection of their data, to complete the form: '*Undergraduate Ethical Assessment for Work with Human Participants – Student form*.'

1.7 For shorter projects/briefs where students are likely to be working directly with human participants and collecting their data, Programme Leaders should complete a project level ethical assessment for the taught projects or briefs using the *Undergraduate Ethical Assessment for Work with Human Participants* (*Staff form).* This should be submitted to the Ethical Practices committee for further review if 'yes' has been answered to any of the mandatory questions.

1.8 For work that does not involve working directly with human participants, students should complete the '*UG Ethics Checklist for Non-Participant Research'*.

2. Ethical Principles

2.1 There are two ethical principles underpinning this policy document: firstly, **do no harm** (non-malfeasance) and secondly, **do good** (beneficence).

2.2. The principles outlined in this ethics policy cover practice based research as well as more 'traditional' modes of research enquiry. It also includes the building and testing of any prototypes of devices.

2.3 A full list of the ethical issues covered by this policy can be found in Section 7. A list of relevant legislations pertaining to research can be found in Annex A.

2.4. In particular, research involving human participants in any manner involves a level of risk that must be appropriately considered (via the *Undergraduate Ethical Assessment for Work with Human Participants Form*) and managed prior to research work commencing (See section 4).

3. Definition of Creative Practice Research

The following definition is offered here to help clarify what is meant by creative practice research.

"[a]rts-based research can be defined as the systematic use of the artistic process, the actual making of artistic expressions in all of the different forms of the arts, as a primary way of understanding and examining experience by both researchers and the people that they involve in their studies". (Knowles, J.G and Cole, A (2008) *Handbook of the Arts in Qualitative Research* pg. 29).

4. Summary of Processes for seeking ethical approval

4.1 Almost all creative research activities are likely to incur an ethical dimension and therefore it is important to have an appropriately tailored ethical approvals process in place at GSA. A flowchart of the process is included in Annex B, C and D at the end of this document. The procedure is as follows:

4.2 *Participant and Non-Participant Research: Programme Leader/Course Tutor Level Approval (See Annex B) for projects.*

In some Schools, Course tutors/Programme Leaders within the GSA will undertake a Project Level Ethical Assessment for taught briefs undertaken prior to the start of the academic session (particularly for UG Years 1, 2, 3). This will require that staff pre-check the ethical impact of the brief in conjunction with collective training for students - particularly where participant research is required. Under these conditions, students will *not* be required to undertake an *individual* ethics assessment for their projects as this will be dealt with at a project level. Taught project briefs set for students involving research with human participants that may potentially carry more risk than usual should be submitted to the Ethical Practices Committee. The Staff version of the *Undergraduate Ethical Assessment for Work with Human Participants Form* should be used in this instance.

4.3 Non-Participant Research - Student Self Directed Research (See Annex D)

Where research is being undertaken by students engaged in self-initiated briefs and/or personal projects that do *not* involve human participants (i.e. low risk) students should complete the *UG Ethical Assessment Form for Non-Participant Research*. Students should retain this form as evidence of their consideration of the ethical implications of their research. There is no requirement for sign off by an academic member of staff, however their Tutor/Supervisor/Programme Leader could request this at any time. Students are also strongly encouraged to discuss with their tutor any further ethical implications or questions arising from the completion of this form.

4.4 Participant Research - Student Self Directed Research Projects (See Annex C)

In the cases were students are engaged in self-initiated briefs and/or personal projects where they plan to work *directly* with human participants and collect their data, students should complete the '*Undergraduate Ethical Assessment for Work with Human Participants' Form*. Completing this form will separate out proposed creative research that is considered to be 'higher risk' from that which is 'low'.

4.4.1 Students do not require sign off by their Tutor/Supervisor or Programme Leader for research involving human participants that is considered to be 'low risk'. A student can find out whether their work is 'low risk' or 'higher risk' by completing all of the mandatory questions on page 1 of this form. If a student responds 'no' to all of the mandatory questions, they can progress their research *without* seeking signed approval from their Tutor/Supervisor or Programme Leader. It is important for students to complete this form, sign and date it and retain it. Their Tutor/Supervisor or Programme Leader may ask them for this form at any time.

4.4.2 For 'higher risk' research (where students respond 'yes' to any of the mandatory questions), students will be asked to complete the form requesting a detailed account of the ethical risks and actions for mitigation to be submitted to their Course Tutor/Supervisor/Programme Leader for approval. This may trigger a conversation between the student and academic member of staff to explore the issues more fully. Once this conversation has been undertaken and the ethical risks assessed and mitigated, the Course Tutor/Supervisor or Programme Leader will either sign off on the proposed project or may reject the proposal. In the latter case, the student will be required to re consider the design of their project. Topics likely to need further detailed exploration are featured in 4.7. Course Tutors/Supervisors/ Programme Leaders will require to use their professional judgment as to whether full ethical approval is required.

4.4.3 In all cases – whether 'yes' or 'no' was recorded on the *Undergraduate Ethical Assessment for Work with Human Participants Form*, students are advised to complete the Ethics Self-Assessment Checklist (located at the back of this form). This is designed to help them to further identify any ethical issues in their project.

4.5 Tutors/Supervisors/Programme Leaders are obliged to report projects proceeding in the absence of ethical assessment to the relevant Head of School.

4.6 UG Ethical Practices Committee Approval

Where a Tutor/Supervisor/Programme Leader thinks that the project requires further consideration (because it presents a 'higher risk') but the project is fully justified, students will be referred to the *UG Ethical Practices Committee* to undertake a more in-depth ethical review of their work. They will be required to complete the *Full Ethical Assessment Form*. This is a narrative based form designed to help the student carefully examine the finer details of their proposed research.

4.7 This route is only recommended for students in the advanced stages of their studies and will be used **only in exceptional circumstances**. For example, in supervised work with children, young people under 18, or potentially vulnerable groups. These applications require full ethical approval by the *UG Ethical Practices Committee* and will also require final sign off by the committee. Types of research likely to require full ethical assessment also include:

- Research that might fall under The Counter-Terrorism and Security Act 2015[1] (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) *highly sensitive* (for example those topics considered private, stressful or sacred, such as sexuality or death); ii) that could induce harm or distress beyond reasonable expectation; iii) where the safety or wellbeing of the student themselves could be in jeopardy;

4.8 Students should bear in mind that Full Ethical Approval could take up to 2 weeks and they should factor this additional time into their schedule.

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

4.9. *Full Ethical Assessment Forms* and supporting materials (e.g. consent form, project information sheet) will be reviewed by at least two member of the GSA UG Ethical Practices Committee.

4.10 Committee members will consider the application, make a decision and report the decision via the Senior Academic Fellow 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.

4.11 In the case of (C), in part 4.13 above, the revised application must be re-submitted through the same procedure.

4.12 In the case of research that falls under the Counter-Terrorism Security Act 2015 and in accordance with standard academic practice, students will be expected to conduct such research in a responsible manner that does not contravene this legislation. Committee members and the Senior Academic Fellow (Digital Learning) will offer advice in this regard, consulting with the GSA Prevent Working Group for expertise where necessary.

4.13 Where creative research is undertaken in collaboration with another institution or organisation outside of the Glasgow School of Art, the ethics policies of those institutions should be appended to the Full Ethical Approval Form at the point of obtaining sign off. Web links to those policies are also acceptable.

4.14 All forms and documents relating to the GSA UG Ethics procedure can be found on Canvas to which all UG students and staff will have access.

5. Creative Research, Teaching, and Knowledge Exchange Activities

5.1 Work undertaken as part of a student's own personal practice with outside agencies/bodies and that is **not part** of a GSA UG programme, is the responsibility of the student. Work of this kind should **not** be carried out on GSA premises.

5.2 The GSA UG Ethics Policy does not apply to day-to-day pedagogic enquiry and interventions that are part of the normal educational interactions between teacher, student and institution. However, if a student is carrying out a defined creative research project in which data is being gathered systematically from peers and / or others over an extended period this **does** require ethical consideration and the *Undergraduate Ethical Assessment for Work with Human Participants Form* should be used.

5.3 The GSA UG Ethics Policy also applies to any research work undertaken by a UG student whose main focus is knowledge exchange (i.e. work with an outside body/agency/ company/business).

6. Obligations and Responsibility of Undergraduate students

6.1 All UG students must comply with the *GSA Undergraduate Ethics Policy*, as set out within this document. In complying with the policy, the student understands the importance of undertaking thorough ethical consideration of all the issues in the proposed planned research **prior** to it commencing. This implies that the student has completed the *appropriate forms (as outlined in Section 4).* These forms help the student to assess and minimize the risks associated with their research proposal.

6.2 Students must also follow the *GSA Ethics Code of Practice* and adhere to its principles and recommendations when carrying out their research. Further explanations relating to the key principles outlined in the *GSA Ethics Code of Practice* can be found in the UG Ethics Guidance Document.

6.3 Following UG Programme level inductions within Schools, it is the responsibility of the student to ensure that the appropriate ethical clearance, both within GSA (and, if appropriate, with other external bodies) has been obtained *prior* to carrying out their research involving human participants and the collection of their data. Students should consult their Programme Leader, Course Tutor or Supervisor if they are unsure.

6.4 When conducting creative research work in collaboration with other institutions or outside bodies, students must comply with the rules, regulations and processes of partner organisations where these are specified. The student's Tutor, Supervisor or Programme Leader will draw attention to these where required.

6.5 With the assistance of teaching staff, students must also familiarize themselves, where appropriate, with relevant legislation relating to their research, including GSA Policies. In particular, students should refer to GSA's Health and Safety Policy and Data Protection Policy. It is the responsibility of the student to abide by each of these and any obligations contained within these policies. 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 the Counter Terrorism and Security Act 2015 (see Annex B). It also includes all legislation governing working with human participants unable to give informed consent, the safeguarding of children, welfare of animals, uses of human tissue and health and safety regulations. Web links to this legislation can all be found in the Undergraduate Ethics Guidance Document.

6.6 All Glasgow School of Art Undergraduate students must demonstrate ethically sound behaviour when carrying out research as part of their work at the Glasgow School of Art, including (but not limited to):

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

ii) respecting any copyrights and the ownership of intellectual property and avoiding any practice that may be misleading;

iii) producing or publishing (regardless of format) creative practice research to the highest standards of academic integrity and representation;

iv) independence of research should be clear, and any conflicts of interest must be clearly declared by the student.

7. Ethical issues to which this policy relates

7.1 The following is a list of ethical issues that may need to be considered:

a. Ensuring 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 activity, length of time the information will be kept, the nature of its use, confidentiality & security, 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 participants in order to minimise distress or anxiety;
f. Data Protection compliance (including confidentiality, security and destruction of data);
g. Disclosure Scotland compliance (where required);
h. Extent to which research could be undertaken with fewer numbers of human participants;
i. Extent to which research will achieve its desired aims and not waste time of research participants;
j. Animal welfare (see GSA's Policy on the Use of live animals in study, installations and exhibitions)
k. Use of animal or human tissue (as defined by the GSA *Ethics Code of Practice)*
l. The way in which archives, datasets, databases, visual material (e.g. photographic or video), internet or social media material is used and referenced;

m. Weighing the benefit of the research balanced against its risks;
n. Considering whether there are any conflicts of interest;
o. Professional conduct of the student;
p. Compliance with all legislation related to creative research work, including public presentation of practical work.

7.2 All research conducted within GSA will incur one or more of the issues outlined above to a greater or lesser extent. Undergraduate creative research activities (including the public presentation of practical work) require ethical approval via the *'Undergraduate Ethical Assessment for Work with Human Participants' Form* which they retain themselves, or the '*Undergraduate Ethical Checklist for creative research (non-participant research)'* which may require tutor sign off.

8. The Undergraduate Ethical Practices Committee and Remit

8.1 The remit of the GSA Ethical Practices Committee is:

To oversee questions of ethics relating to the development of creative research activities including the public presentation of practical work for GSA UG students that involve human participants or research that is considered to be 'higher risk'.

8.2 The Undergraduate Ethical Practices Committee is convened by the Head of Learning and Teaching, and its membership comprises the Academic Fellow in Digital Learning (Deputy Convener) and two Senior Academics. From time to time, representatives from other areas of GSA (such as Human Resources, IT) may be called to participate.

8.3 The Undergraduate Ethical Practices Committee meets once per academic year to define the institution's approach to undergraduate ethics. It receives an annual report on enquiries and full ethical applications (used in only exceptional circumstances) from Schools. It also discusses changes in the external environment that may require changes to the undergraduate ethics policy and procedures.

8.4 The Committee is responsible on behalf of the Undergraduate and Postgraduate Committee (UPC) for:

i) Establishing and maintaining the UG ethics policy;

ii) Establishing an ethics protocol and procedures;

iii) Establishing and maintaining best practice on ethical issues in relation to the external environment;

iv) Reviewing, recommending and making decisions on all ethical issues that relate to creative research activities by GSA UG student researchers deemed more than low risk.

v) All reporting on matters arising during committee operation.

9. Reporting of the Undergraduate Ethical Practices Committee

9.1 Where appropriate, The Convener of the UG Ethics Committee will provide Undergraduate and Postgraduate Committee (UPC) with updates on the business of the Undergraduate Ethical Practices Committee.

9.2 The UG Ethical Practices Committee will periodically review the effectiveness of the policy and solicit regular reports from all Board of Studies with regards to its implementation across the undergraduate body.

9.3 Each of the Schools Boards of Studies will support the implementation of the Undergraduate Ethics Policy with full support from the Undergraduate Ethical Practices Committee. It will instruct Course Tutors, Supervisors and Programme Leaders on how to embed the principles and procedures within course structures. It will monitor the uptake of the policy and provide update reports to the Undergraduate Ethical Practices Committee**.** It will also recommend any course of action should any student fail to comply with the requirements of this policy.

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References

In compiling the PGT Ethics Policy, the author gratefully acknowledges the following documents:

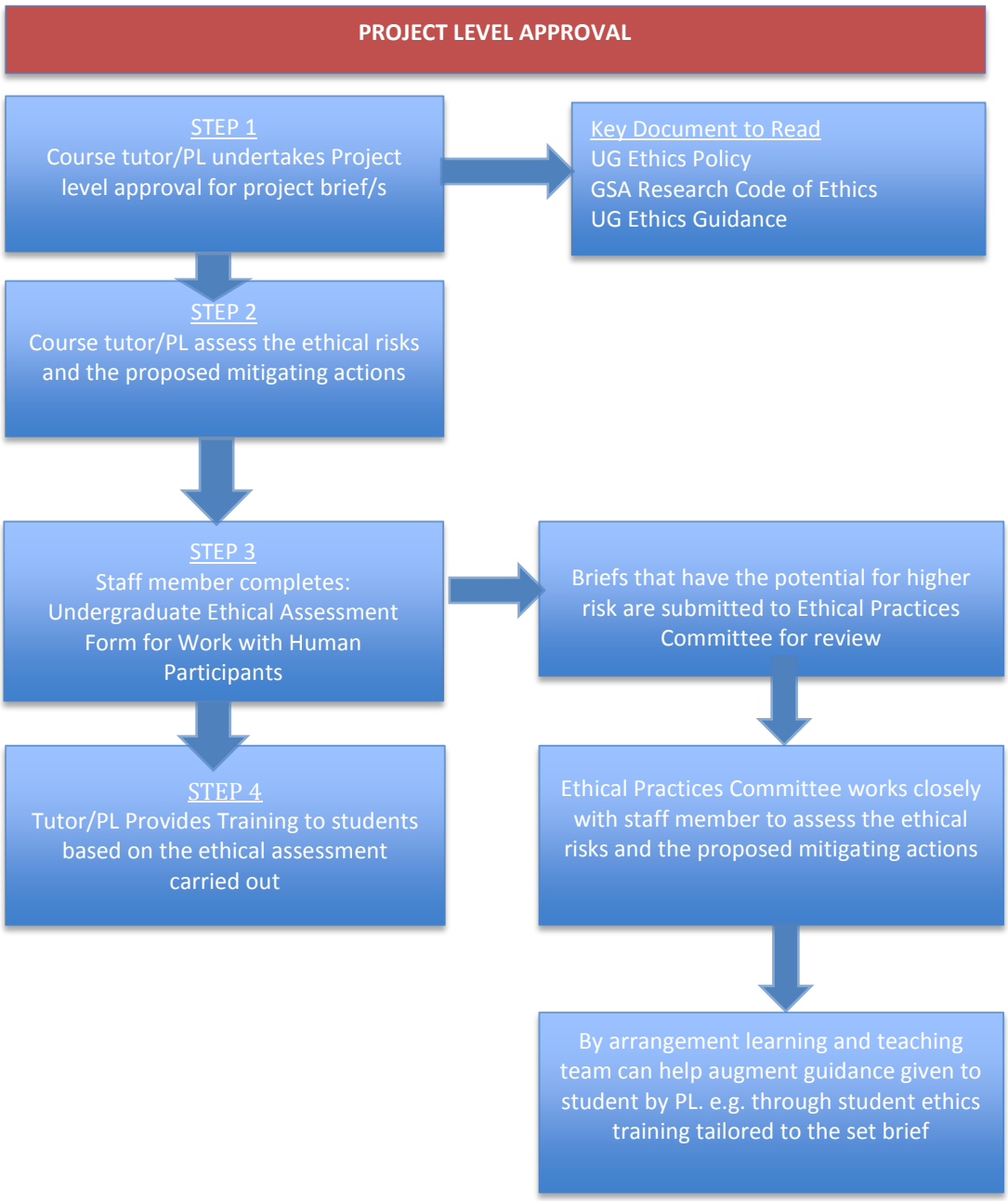
1. GSA Research Ethics Policy 2016
2. University of the Arts London, Code of Practice on Research Ethics
3. University of the Arts London, Guidance for Research Ethics Approval
4. University of Bristol, Ethics of Research Policy and Procedure
5. Oxford Brookes University, Ethics Review Process
6. Oxford 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, De Montfort 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)
14. Oversight of Security Sensitive Research Material in UK HEI's, Guidance Document 2010.

Annex A: Legislation relevant to research in creative practice

The following pieces of legislation are relevant in research. The Undergraduate Ethical Assessment Form was composed to draw out any issues that might pertain to these Act(s) nonetheless it is important to be aware of them:

A. Data Protection Act (2010);
B. Freedom of Information Act (Scotland) 2002;
C. Equalities Act (2010);
D. Computer Misuse Act (1990);
E. Obscene Publications Act (1964);
F. Protection of Vulnerable Groups (Scotland) Act 2007
G. Human Tissue (Scotland) Act 2006
H. Bribery Act 2010

Annex B: Flow Chart to illustrate Project Level Approval



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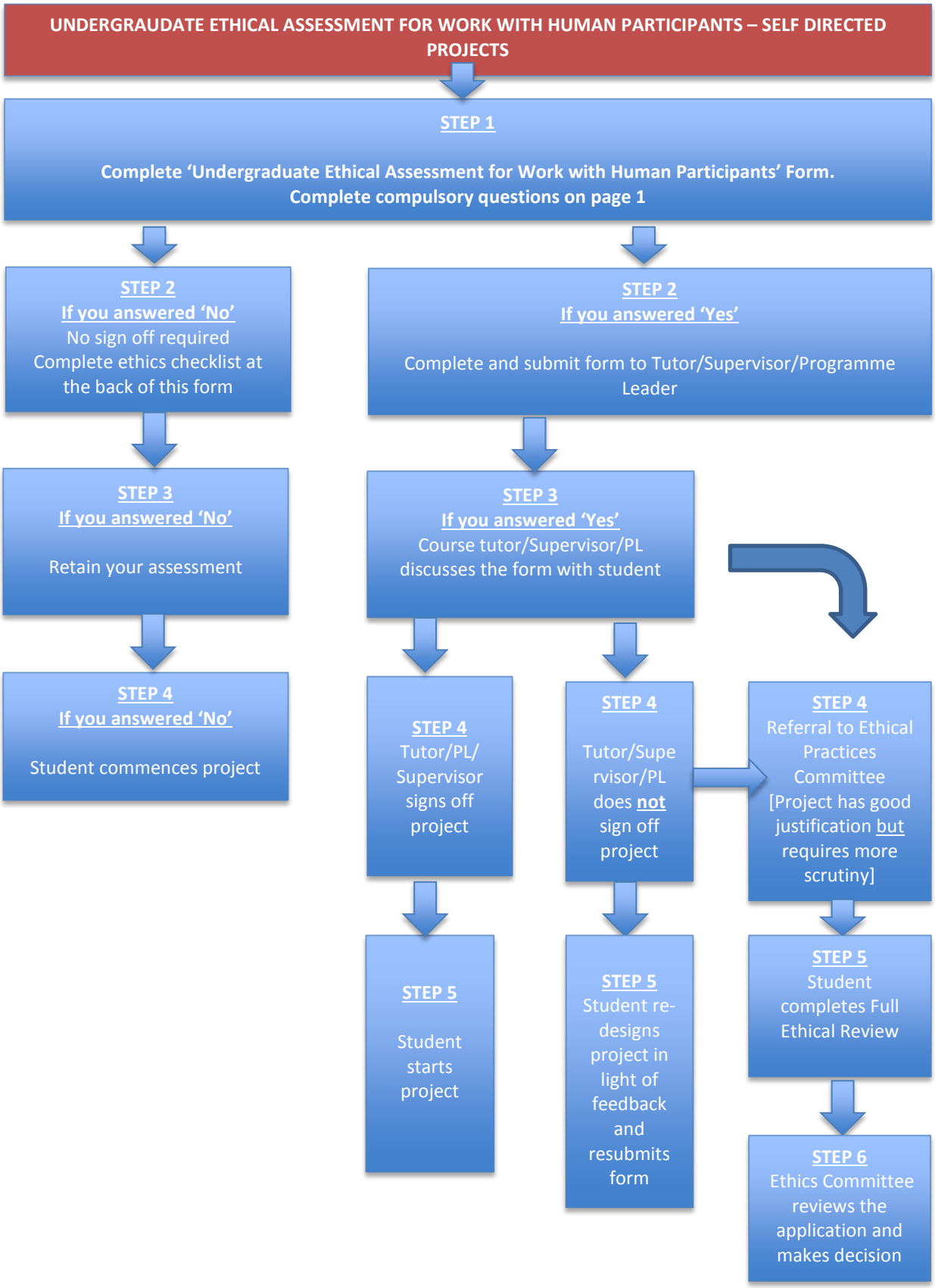
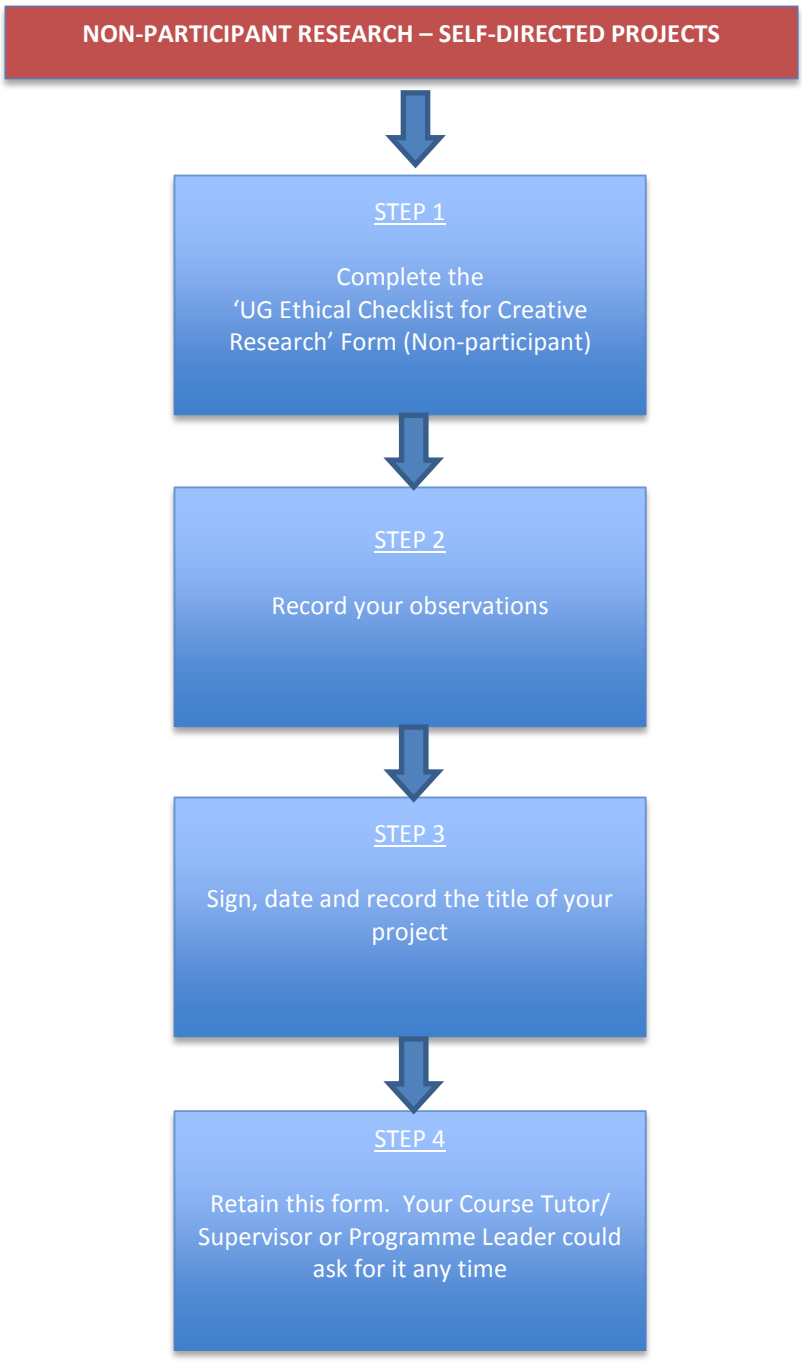
Annex C: Flow Chart to illustrate Self-Initiated Project Approval (working with human participants)



Annex D: Flow Chart to Illustrate Process for Non-Participant Research – Self-Directed Projects