

The Glasgow School Of Art

Research Ethics Code of Practice

1. Introduction

1.1 The GSA Research Ethics Policy sets forth the minimum expectations placed on researchers in respect of **ethical consideration within research activities**. Issues involved can be varied and often complex. The extent to which those issues impinge upon the research activities taking place can be determined by careful consideration of the guiding principles outlined herein.

1.2 The underpinning ethical imperatives are two fold: firstly, **do no harm (nonmaleficence)** and secondly, **do good (beneficence)**. Each of these two imperatives will be balanced against the risks involved in undertaking the research activities. For example, in research involving NHS patients or those in vulnerable groups, the level of risk is high. In research that utilises methodology rooted in social sciences or psychology (questionnaires, interviews etc), the risk is less clear cut. Research which entails the use of visual materials, ephemera, oral histories and items in personal collections also raise ethical considerations but which may be of low risk upon examination.

1.3 The following principles should guide researchers in their consideration of ethical issues relating to research activities and set forth the minimum standards we expect researchers to conform to.

2. No research should cause harm, and preferably lead to benefit

2.1 Careful judgment should be exercised by the researcher as to whether a particular intervention will cause any harm to a research subject (regardless of whether that subject is a human participant, visual material or other). Any potential risks should be identified, the researcher should plan to mitigate against that risk and ultimately weigh up the cost of potential harm against potential research outcomes.

2.2 All procedures, research methodologies and interventions must be clearly and carefully identified and articulate why alternative approaches involving less risk cannot be deployed. All must be outlined in language that would allow both research experts and laymen to easily understand.

2.3 All the potential benefits to the research subjects, the field of research and society as a whole must be clearly outlined.

3. In the case of research involving human participants (direct):

Herein, human participants as subjects are defined as individuals freely able to give informed

consent and directly participate in research activities.

3.1 Participants should be free of coercion of any kind

3.1.1 Compensation or incentives for participants is acceptable as long as they are not considered inducements.

3.1.2 Compensation or incentives should be restricted only to reimbursement of travel, time and a small token of appreciation for participation (e.g. shopping vouchers). Anything outwith these parameters would be considered inappropriate motivation and compromise the work undertaken by the researcher (please see Gifts and Hospitality Policy (2012) <http://www.gsa.ac.uk/media/932389/Gifts-and-Hospitality-Policy.pdf>).

3.1.3 Compensation or incentives should not be utilised to compromise participants' consideration of risk inherent within the research.

3.1.4 Reimbursement of travel expenses should not be considered an incentive and is only to be considered as a reasonable minimum compensation for the participant's involvement.

3.1.5 Participants must be free to withdraw at any time and still claim compensation or incentives offered.

3.2 Participants have the right to give informed consent and withdraw that consent at any time without reason

3.2.1 Informed consent is defined as consent by a participant in a research activity, freely given. For consent to be legally valid, it must be obtained i) knowing (or having evidence of) the participant is mentally competent or of appropriate age to consent; ii) the consent is given on a voluntary basis, free from inducement; iii) appropriate information must be given to the participant by the researcher on the nature of the activity undertaken.

3.2.2 Informed consent exists to protect the participant *not* the researcher. The pursuit of knowledge is not justification for ignoring the interests, health, safety and well being of those participating in the proposed research activities.

3.2.3 Informed consent is not a static entity, it is a dynamic on-going process and researchers must consider where renegotiation of consent is required where the activities involved i) take place over a prolonged period; ii) ethical issues alter or arise during the course of research; iii) methodologies evolve and alter subsequent to the original plan of activities.

3.2.4 Consent should be obtained in the manner which best befits the participants' abilities. For example, a participant of impaired sight may require to give consent orally rather than in written format.

3.2.5 Quality of consent is critical and the onus is on the researcher to ensure the consent conforms to the minimum standards set out in 3.2.1 above.

3.3 Participants have the right to expect to receive clearly communicated information from the researcher in advance of participation and throughout the research process

3.3.1 All information should be administered to participants in clear language without jargon or technical terms employed and should be easily understandable to a non subject expert. The document should not be overly long and information kept to a minimum.

3.3.2 An information sheet outlining (at a minimum), i) purpose of the research activities; ii) procedures and risks involved; iii) benefits (either directly to the participant or society at large); iv) methods of dissemination upon completion; v) level of confidentiality / anonymity; vi) how long (and by what method) any data collected will be retained for and clearly state what the purpose of that information will be used for; vi) that the participant is free to withdraw at any stage without giving a reason and will still be in receipt of any compensation or incentives offered; vii) contact details of the lead researcher should be given.

3.3.3 Participants should be given plenty of time to study the information sheet and ask questions otherwise consent is not informed. The length of time should be appropriate to the study and required involvement for example, a questionnaire taken on the street may only require a simply verbal explanation lasting a few minutes, workshops taking place over a few months a lasting for a few hours each would be considered more onerous and participants should be given several days to consider.

3.3.4 Where possible, follow up information should be left with participants at the conclusion of their involvement. This could include contact details of the researcher, leaflets / literature for further information especially if the research causes minor distress or similar.

3.4 Participants' confidentiality, anonymity and preservation of dignity is paramount

3.4.1 All participants should familiarise themselves with the Data Protection Act 2018 and the GSA Data Protection Policy 2020 (https://www.gsa.ac.uk/media/1805339/gsa-dataprotectionpolicy-28-january-2021_feb-update-final.pdf).

3.4.2 Researchers should prioritise the confidentiality of participants and take precautions accordingly.

3.4.3 The identity of the participant, or any information which could lead to the identification of the participant, should not be revealed without the participant's written consent.

3.4.4 If personal identifiers are required, researchers must disclose this to participants and how confidentiality will still be maintained.

3.4.5 Information provided by the participant should be considered privileged and not be disclosed beyond the terms of the research activity unless compelled to do so by an act of law.

3.4.6 The following are acceptable methods of anonymising participant data:

- i) all research personnel collecting or handling participant data must sign confidentiality statements;
- ii) coding data with numbers instead of names;
- iii) storing identifying data in a locked file which only one or two members of the research team have access to;
- iv) using pseudonyms where appropriate;
- v) disposing of information in a manner which ensures confidentiality is maintained.

3.5 Participants' cultural, religious, gender or any other differences must be respected and sensitively handled by researchers

3.5.1 Researchers must ensure balance is achieved in recruitment of participants and no portion of society should either be unreasonably burdened or discriminated against.

3.5.2 Where possible, researchers must make provision for differences in language, ability or any other differences. This could include transferring the location of work to a more accessible location or providing information in a variety of languages.

3.5.3 Where research activities seek to target a particular group where cultural, religious, gender or any other differences are inherent, that researcher must demonstrate the steps they have taken to ensure they and any coworkers are fully aware of potentially sensitive areas and mitigate for these.

3.5.4 Research which requires a researcher to embed themselves within a particular geographic area or cultural group must be sensitively handled with respect to confidentiality and researcher neutrality. Relationships herein would be complex and careful planning on the part of the researcher is required to safeguard themselves and participants.

3.7 Research carried out in participants' homes must be respected and sensitively handled by researchers

3.7.1 Wherever possible, research should be carried out in a neutral third party location (e.g. community centre) to ensure the safety of both participant and researcher.

3.7.2 Where research is required to be carried out in a participant's home (e.g. as a result of disability, the home location being central to the study), this should be made explicit at the point of obtaining informed consent.

3.7.3 The researcher should i) carry a suitable form of identification; ii) check in with another member of the research team (by telephone or similar) upon entering and leaving participant's home; iii) inform local police they are carrying out research in the area.

3.7.4 Any evidence of abuse, neglect or illegal activities observed by the researcher within the home must be reported to the relevant authorities by said researcher. This may require breaking of confidentiality offered to the participant at the initiation of the researcher and therefore is an act not to be taken lightly.

3.7.5 Researchers must make themselves aware of the GSA Health and Safety policy and adopt a safe working protocol, such as the Social Research Association, Code of Practice for the safety of social researchers¹

4. In the case of research involving access to human participants via gatekeepers (indirect):

Gatekeepers are defined as individuals who are in a position to give informed consent (pursuant to 3.2.1) but who are not directly the subjects of the research activities themselves; rather, they provide access to researchers of those who are.

4.1 When access to human participants in protected circumstances arises, consent must be obtained from their gatekeeper

4.1.1 Individuals in protected circumstances include:

- i) children and young persons – those under 16 require the consent of parent, carer or guardian by law. Young persons (between 16 and 18) are considered free to give their own consent but it is advisable to inform parent, carer and guardian of young person where possible (<https://www.gsa.ac.uk/media/1635526/child-protection-policy-october-2018-final.pdf>)
- ii) adults who lack mental capacity to give informed consent or who may possess a power of attorney order, regard for the Adults with Incapacity (Scotland) Act 2000 should be considered and specialist legal advice may need to be obtained. Relevant GSA policy on working with protected adults (<https://www.gsa.ac.uk/media/1635523/adult-protection-policy-october-2018-final.pdf>).
- iii) other vulnerable groups: prisoners, patients, employees, residents of a care home or similar, individuals in these groups may feel coerced into participation in research when their gatekeeper (i.e. employer or care home manager) has given consent. Researchers must ensure that individuals are aware they are under no obligation to take part, are free to withdraw at anytime and preferably should countersign any consent form that the gatekeeper has signed to illustrate their willingness to participate.

4.2. Gatekeepers must not receive compensation or incentives

4.2.1 As they are not direct research participants, gatekeepers are not eligible to receive compensation or incentives, only reasonable out of pocket expenses in assisting the participant in their involvement, such as for travel or catering.

¹ http://the-sra.org.uk/sra_resources/safety-code/

4.2.2 Compensation or incentives may lead to research participants being coerced into participation by gatekeepers. It is the responsibility of the researcher to ensure that consent is obtained in a manner free of coercion. Please see the GSA Anti Bribery and Corruption Policy (<http://www.gsa.ac.uk/media/941849/gsa-anti-bribery-and-corruption-policy-.pdf>).

4.3 Both gatekeeper and participants should receive information in advance of participation and throughout the research process

4.4 Researchers have a duty of care towards both gatekeeper and participant

4.4.1 The relationship between gatekeeper and participant by its nature is an unequal one and must be sensitively handled by researchers.

4.4.2 During the process of obtaining consent or execution of the research activities, if evidence arises of abuse, illegal activities or similar, the researcher has a duty of care to report such occurrences to the relevant authorities (social worker or police, for example). It should be noted that such occurrences could apply to both gatekeeper and participant, for example, if a participant has a condition which leads to aggressive behaviour, gatekeepers could be susceptible to abuse by those in their care.

4.5 Honesty should be central to the relationship between the researcher, gatekeeper and participant

4.6 GSA researchers should only recruit participants from within GSA itself as a last resort when other avenues of recruitment have been exhausted

4.6.1 Whilst recruiting from within GSA itself can be viewed as an expedient option, it is fraught with ethical difficulties such as unequal power relationships, role of researcher as researcher rather than colleague, researcher being privy to personal information that might not otherwise have been disclosed in a typical working relationship. Therefore, recruitment within the organisation should only be pursued as a last resort due to the sensitivity and ethical complexities.

4.7 Recruitment from GSA family members, including children, should only be pursued as a last resort when other avenues of recruitment have been exhausted

4.7.1 Given the nature of the research GSA conducts and its wide applicability to society at large, it can also be viewed as expedient to recruit from GSA family members. As in 4.6, this is fraught with ethical complexities and should be avoided.

4.7.2 In the case of children of GSA staff / students being recruited as research participants, coercion becomes the primary concern. Special care must be taken by researchers to ensure the child has not been coerced by the parent. This could also

present a conflict of interest to the researcher – children of GSA family members are therefore not permitted to be research participants in GSA led research projects.

5. Archival research must be conducted sensitively and with respect for the law

5.1 It is the responsibility of the researcher to ensure they work within the law, particularly with regards to copyright legislation.

5.2 Wherever possible, researchers must secure in writing, permission to access the archive material relevant to their research activities. At a minimum, researchers should also inform the owner of the purpose of the research, where it is likely to be disseminated, how long they would require access to the material and at what location.

5.3 Where the owner of the archive is unknown, researchers must make all reasonable attempts to locate the owner, relatives, or any other known associates, prior to accessing the material².

5.4 Misrepresentation of the archive material (or its subject matter) would be considered deceptive research and is forbidden unless the researcher has informed the owner of the material such deception is intended.

5.5 It is acknowledged that archive material could be one off's, fragile and may give personal details: researchers must work with such archive material sensitively and within any rules or regulations laid down by the owner of the archive material.

6. Interviews for the purpose of research must be obtained or conducted with respect for the law and handled sensitively

6.1 All interviewees must be treated with respect and courtesy by the researcher.

6.2 Pursuant to section 3.3 within, informed consent must be obtained prior to any interview commencing and a detailed information sheet administered.

6.3 Interviewees have the right to terminate the interview at any time without needing to give a reason.

6.4 Pursuant to section 3.4 within, unless the interviewee has waived their right to anonymity in writing at the point of consent, all information must be used, stored and disseminated in a manner that does not allow the identification of the interviewee.

6.5 Any restrictions which the interviewee has requested (e.g. where the material can be disseminated, if it could be used by a third party etc) must be recorded in writing by the researcher and kept at all times with the history taken.

6.6 If the researcher requires to make use of interview material taken by a third party, all reasonable attempts must be made by that researcher to view (and obtain a copy of), the original consent form signed by the interviewee and comply with any restrictions stated by the interviewee.

² For further guidance, please see the National Archives of Scotland_
<http://www.nas.gov.uk/searchRooms/dataProtection.asp>

6.7 Interviewees should not be burdened by repeat requests for similar material or further information. Therefore, researcher must ensure the interview is preserved and, pending the agreement of the interviewee and made available to any other third party on request.

6.8 Any copyright or other legal issues must be clearly explained to the interviewee and assignment of rights to GSA to be obtained where need be.

7. Images collected by participants (participant led visual research) for the purpose of research requires strict guidance administered to participants

7.1 Informed consent in written or oral format must be obtained prior to engaging a participant in participant-led visual research.

7.2 By asking participants to record their own images as part of the research activities, researchers place the burden of responsibility of doing so to participants. Improperly handled, participants may be placed in harm's way or breach legislation. Researchers must be explicit as to the nature of the images they request participants to record and careful consideration must be given to the risk therein.

7.3 Copyright for participant generated images lies with the participant and not with the researcher. It is advisable for the researcher to request the participant assigns copyright to the researcher. Where this is not possible, the researcher must secure the permission of the participant to use the image as part of the research activities and clearly articulate the purposes for which it will be used for, including any subsequent dissemination.

7.3 Researchers should consider whether participant generated images requires further consent of individuals or places being photographed by the participant. It should not be left to the participant to decide this nor left to the participant to explain the nature of the research for which the images are being taken / recorded to others.

7.4 Any image or recording which captures illegal or morally questionable activity must be handed over to the relevant authorities (e.g. police, social worker) and in doing so, confidentiality may be breached. The researcher must make the participant aware at the point of obtaining sign off of instances where confidentiality might be breached.

8. Researcher generated images (researcher led visual research) as part of research activities requires explicit consent and mutual trust

8.1 Copyright for images collected by a researcher as part of the research activities are wholly owned by said researcher. However, it is still incumbent upon that researcher to ensure that any individuals or place identifiable in that image has given consent.

8.2 Pursuant to section 3.2, informed consent must be sought when photographing or videoing human participants wherever possible. In some instances, verbal consent may be sufficient, dependant upon the research activity.

8.3 In the case of photography and video at a public event where signs detailing image recording will take place, this does not require consent of any individuals, provided the holders of said event give permission to photograph or video for the purposes of research. However, if a particular image is to be re used or disseminated in any way, it is incumbent on that researcher to obtain permission if possible.

8.4 The idea of what constitutes a public space must be carefully considered by the researcher. Managers of shopping centres or local authority libraries, leisure centers may not view their premises as public spaces and permission should be sought from managers / owners / landlords as well as from individuals.

8.5 Where an individual agrees to be photographed but wishes to remain anonymous, the researcher must respect the individual's wishes. Careful considerations should be given as to the method of anonymising identity: pixelating images could lead to connotations of criminal activity for example. Any other identifying markers (for example, jewellery, gestures etc) should be obscured also.

9. Covert research and deception should be avoided

9.1 Covert research is to be avoided and will only be acceptable in certain circumstances. For example, difficulties arise when research participants change their behaviour because they know they are being studied. Researchers may also face problems when access to spheres of social life is closed researchers by powerful or secretive interests. If deception is required, the reasons should be disclosed to the participants upon conclusion of the research activities.

9.2 Covert methodologies violate the principles of informed consent and may invade the privacy of those being studied. Covert researchers might need to take into account the emerging legal frameworks surrounding the right to privacy. Participant or non-participant observation in non-public spaces or experimental manipulation of research participants without their knowledge should be resorted to only where it is impossible to use other methods to obtain essential data.

9.3 In such studies it is important to safeguard the anonymity of research participants. Ideally, where informed consent has not been obtained prior to the research it should be obtained post-hoc.

10. Areas of research deemed 'sensitive' will be subject to greater scrutiny to safeguard researchers and participants and ensure adherence to the law

10.1 Sensitive research requires greater consideration as there is a greater likelihood of harm or distress beyond reasonable expectation to both researcher and participant;

10.2 Sensitive research can be difficult to define but broadly speaking it could fall into the following categories:

10.2.1 Research into illegal activities, such as drug taking, prostitution, obscene films or publications as examples;

10.2.2 Research into health or lifestyle choices that could be deemed intrusive such as palliative care, as an example;

10.2.3 Research where participants are in protected circumstances (4.1.1);

10.2.4 Research taking place in a country the UK or Scottish Government has deemed 'no go'³ even if that country is known to the researcher in some capacity;

10.2.5 Research which generates sensitive data that may appear innocuous relevant to the research question or context but which could be misused by a member of the public;

10.4 Researchers should consider carefully if a sensitive research topic is worth pursuing and be prepared to fully articulate the need for that research when asked to do so by the institution. Alternatives to mitigate the sensitive nature should be explored and if these cannot be pursued, the researcher should be prepared to demonstrate why not;

10.5 Pursuit of academic or creative freedom is not justification for engaging in sensitive research.

11. Research into extremism, radicalisation and security (incl military) will be subject to greater scrutiny to safeguard the researcher and any participants pursuant to the Counter Terrorism Security Act (CTSA)

11.1 Research into extremism, radicalisation and security (incl military) will need to be well justified and with robust plans for the handling of any sensitive data, materials or participants;

11.2 The institution cannot become a platform for the dissemination or advertisement of radical views or practices the CTSA is intended to target;

11.3 Researchers can seek advice from the Research Office (in the first instance) for advice on the safe conduct of research in this area. The Research Office may seek further advice from the GSA Prevent Working Group, the main body dealing with this legislation in our institution.

11.4 For the avoidance of doubt, research into these areas can still proceed and are welcome as legitimate areas of research within our institution – the nature of CTSA simply means greater scrutiny and planning for within the institution.

³ <https://www.gov.uk/foreign-travel-advice>

12. Images collected from the internet or any other third party sources must obtain the permission of the copyright holder

12.1 It is not permissible for researchers to assume that an image obtained from the internet is free from copyright restrictions. Researchers must make all reasonable efforts to identify and contact the possible copyright holder and request permission to use the image (be it photograph or video).

12.2 Images obtained from any other third party sources must do so by seeking permission (informed consent) and clearly explaining the purpose for which the image is being requested. Where that image clearly identifies a person or place, it is highly desirable for the researcher to locate that individual and obtain further permission, unless the copyright holder can provide evidence of the permission he / she sought in recording the image in the first instance.

13. Use of animals or animal tissue must be carefully considered and only pursued when no other alternatives are available

13.1 The use of animals in research must not contravene the Animal Welfare Act 2006, particularly with regards to prevention of harm and promotion of welfare.

13.2 Where animals are in use the 3R's principle prevails: refinement, replacement and reduction of animals in research

13.3 The nature and use of animals may require specialist Government licenses – researchers must carefully consider the use of animals and may have to adopt alternative modes of enquiry if the use of animals cannot be justified.

13.4 Researchers must not proceed with research involving animals without obtaining permission from GSA / Government authorities.

14. Use of human tissue must be carefully considered and only pursued when no other alternatives are available

14.1 Human tissue is defined as material which has come from a human body and consists of, or includes, human cells, blood or any other product. Consent is the fundamental principle of the legislation regarding the use of human tissue: the Human Tissue Act 2004 lists the purposes for which consent is required.

14.2 Similar to the use of animals, use of human tissue can require specialist Government licenses, depending on the exact nature of research.

14.3 Researchers must not proceed with research involving human tissue without obtaining permission from GSA / Government authorities.

15. Research funding should be obtained from a reputable source and researchers should ensure value for money

15.1 Funding obtained from organisations who utilise unethical and illegal practices must be avoided at all costs. Research and Doctoral Studies will assist researchers in due diligence to determine a funder's suitability.

15.2 Funding obtained from Research Councils, Scottish Funding Council and internal GSA funding is derived from the Government and thus, taxpayers' money for which researchers must respect and acknowledge.

15.3 Funding obtained from charitable organisations can be donated by the public or other organisations (e.g. Lottery or corporate donations) and is typically difficult for the charity to obtain – providing value for money is paramount in this instance.

15.4 Research activities must be costed using full economic costing wherever possible to provide accurate and transparent costs.

15.5 Research activities which require only direct cost reimbursement (e.g. travel, consumables, venue hire etc) must ensure that all expenditure is the cheapest possible without comprising the quality of the work undertaken in order to provide value for money.

15.6 All efforts must be made by the researcher to conduct a thorough search into the background of their research activity in order that only new lines of enquiry are being pursued. Wherever possible, researchers should utilise existing literature, datasets, databases or any other resource already in existence and not create a duplicate resource.

16. All research must be carried out with respect for health and safety policy and legislation

16.1 GSA's Health and Safety policies have been comprehensively reviewed and there are a variety of protocols for work across GSA. These should be consulted in advance of the research work beginning, researchers can source the most up to date copy online (<https://www.gsa.ac.uk/about-gsa/key-information/occupational-health-and-safety/>)

17. Research carried out on a third party location requires the researcher to comply with all rules and regulations

17.1 It is the responsibility of the researcher to make themselves aware of all rules and regulations when working in a non GSA location and abide by these.

17.2 Researchers must participate in any training required by the third party.

18. Research activities should only be carried out with institutions or organisations who have an ethics policy in place

18.1 In seeking to deliver research that is of the highest quality and rigor, researchers must engage with collaborators, institutions or organisations with similar goals. As

identified in the GSA Ethics Policy, a sound research ethics policy ensures quality and rigorous research is undertaken, therefore, research undertaken in collaboration with partners who do not have an ethics policy may be rejected.

18.2 If the collaborating partner, institution or organisation does not have an ethics policy in place but agrees to abide by the GSA Ethics Policy and Code of Practice, the research may go ahead, subject to approval. The collaborating partner will still need to ensure they possess their own public liability insurance and will agree to indemnify GSA against any losses, damage or legislative requests.

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The following amendments were made to the Research Ethics Code of Practice in May 2021

- Policy Details on the front cover were updated (Date of approval, Date of next review, Related policies and documents)
- 3.4.1 – reference to legislation and GSA policy link updated
- 4.1 – links to GSA policies updated
- 16 – link to GSA policies updated
- Sections 15 to 18: numbering corrected.

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