

GSA SUMMARY REPORT OF EQUALITY CONSIDERATION AND ASSESSMENT OF EQUALITY IMPACT

Date of Assessment:	11/12/16	
School/Department:	Learning and Teaching Team	
Lead member of staff:	Madeleine Sclater	
Location of impact assessment documentation (contact or web link):	Maddy Sclater, Centrally located electronically on shared server. m.sclater@gsa.ac.uk	
Area of decision making/title of policy, procedure or relevant practice:	PGT Ethics Policy	
Please indicate if this is:	New:	X <input type="checkbox"/>
	Existing/Reviewed:	
	Revised/Updated:	<input type="checkbox"/>
<p>Summary of how equality, diversity and participation have been considered and due regard given to the Public Sector Equality Duty (PSED):</p> <p>The PGT Ethics Policy is a key policy for postgraduate taught (PGT) Programmes at GSA. It is based on the principles of beneficence ('do good') and non-maleficence ('do no harm'). Justice and respect for autonomy is also integrated into the policy. As creative practice is highly socially engaged, bringing with it increasing degrees of complexity all creative research/enquiry carries an ethical dimension that requires careful consideration.</p> <p>The GSA PGT policy identifies the obligations of PGT student researchers with respect to ethical conduct of themselves and in carrying out their research project/s with their research participant/s/communities. It also defines the process for gaining ethical approval of research undertaken at this level. It is a key policy for all PGT students engaged in any kind of research work, whether undertaken individually, in groups or as part of live projects and at any point in their study. The policy is to be used in conjunction with the institution's <i>Code of Research Ethics</i>. The ethical approvals processes are set out in the policy, and include an initial self-assessment for low risk work, and a full ethical assessment for research considered to fall within a 'high risk' category.</p> <p>The policy offers a supported framework within which all students regardless of experience or identity are able to engage and learn. In undertaking this EIA, we have specifically addressed equality and diversity requirements as set out within the 2010 Equality Act and the Public Sector Equality Duty Scotland. The policy has also been developed in accordance with established and agreed operating principles for ethical research practice at GSA and has been suitably adapted and tailored to PGT level in terms of language and process.</p> <p>The PGT Ethics policy aims to enhance the learning experience of all students on postgraduate taught programmes, taking cognisance of the diversity of students' practices and experiences. Engaging with the policy, associated processes and training is designed to help all students to understand the requirements of ethical and reflective professional practice that is also embedded within a research governance framework. This includes taking into consideration the needs of protected characteristic groups - for example age, disability, gender re-assignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation, marriage and civil partnership. The policy recognises that ethical judgements are often multifaceted and require careful examination and consideration within their</p>		

specific context. The purpose of the policy is therefore to support all student researchers through a set of agreed ethical processes to enable them to evaluate and respond to ethical issues within their projects and to ensure that in relation to the PSED, equality and good relations are at the core of students' day-to-day research enquiry.

Evidence used to make your assessment:

Reasons for introducing the policy

There is a clear need for a policy specifically 1) tailored to the PGT community and their level of study 2) written in accessible language and 3) outlining a suitably appropriate ethical approvals process that are not overly burdensome procedurally for students and staff. In relation to the latter, it was recognised that the process for gaining ethical approval needed to be clearly articulated since the institutional approaches articulated in the GSA Research Ethics Policy (for staff research and PGR students only) are unsuitable for PGT. Prior to the PGT policy there was no institutional policy or approvals process specifically addressing ethics within PGT study. Similarly, there was no specific ethics training awareness for staff or PGT students. It was felt that that the new PGT ethics policy (and its associated documentation) had to be developed in accordance with already established and agreed operating principles for ethical practice within the institution but containing specific modifications in relation to the *language* of the policy, thus making it more accessible to the level at which PGT students are studying, and in relation to the *articulation of the process* for gaining ethical approval (since the process for gaining ethical approval as a staff member or as a PhD/M.Res student is different).

The new PGT Ethics policy was developed from the GSA Ethics Policy (which itself has been in place within the institution since 2005). As the GSA Ethics Policy is well established and already operating within the institution and having been developed out of existing expertise and consensus, it was used as the basis for developing the PGT policy and its associated documentation. The GSA Ethics Policy itself was substantially reviewed and re-approved in 2013, with further updates added and approved in 2016. In reviewing the Research Ethics Policy during 2011-12, the Research and Doctoral Office scrutinised i) legal obligations; ii) UK / EU funder requirements; iii) research ethics policies in place at other institutions. Important sources from this review included i) policies from University of the Arts London, Royal College of Art; ii) Research Governance Framework for Health and Social Care 2005; iii) Social Research Association (SRA) and a variety of Government sites on specific areas of legislation. It should be noted that all of the documentation used to inform the review and amendments to the GSA Research Ethics Policy, is relevant to and also underpins the PGT Ethics Policy. The PGT Ethics Policy was developed in parallel with the updating of GSA's Research Ethics Policy, both of which now reflect current legislative changes and current research practices.

Consultation process and evidence from the sector

Equality and the way in which the policy contributes to the delivery of the PSED were an integral aspect of its development. For instance, as the policy and associated processes were being discussed, developed and formulated, equality issues relating to students for whom the policy is intended, including any research participants, were considered within the context of a GSA wide consultation process. The policy was developed in close collaboration with staff representatives from each School who teach PGT students, the Student's Association, GSA's research and doctoral office and stakeholders from across the wider School. The policy was also developed in consultation with the Teaching and Learning team who are also well versed in equality and diversity, with specialists who research within this area and who have a practical working knowledge of the sectoral expectations as well as approaches to supporting students and staff who identify with a protected characteristic. Additionally, colleagues from other HE institutions were approached for advice and guidance through a UK wide mailing list to consider how PGT ethics is handled in other HE institutions, including those specifically specialising in Art and Design. For example,

the preliminary assessment form was developed from practices established in Manchester Metropolitan's School of Art. This combined expertise and policy has formed the foundation of the judgments made with respect to the formation of the policy.

Outline any positive or negative impacts you have identified:

Each section of the policy can be seen to positively impact upon all students regardless of protected characteristic. The policy does not have any negative impacts upon any protected characteristic group of student researchers. The intention here is that it ensures that student researchers who are working with people from protected characteristic groups are treated according to need and with cultural and social concerns considered.

POSITIVE IMPACTS

Positive impacts were identified in relation to all the key headings of the strategy. These include:

- 1) Having a *clear, accessible process* that can be used by all PGT students where previously there was none. A clear process for gaining ethical approval (e.g. preliminary ethical assessment, and full ethical assessment) for research ensures that students' proposed research project is appropriate and applicable to the social context in which they are planning to work and is also applicable to potential research participants with whom they intend to engage, regardless of protected characteristics. Following this process, which in itself is a reflective learning exercise, enables students, planning to work with particular groups, to identify potential ethical issues and to balance the risks with the benefits;
- 2) The policy covers *all PGT students* across the institution. The term 'student researcher' is used throughout the policy to preserve neutrality across all protected characteristics and, to preserve neutrality across the disciplines, year of study or mode of research enquiry. The policy is intended to be as inclusive as possible.
- 3) Providing all students, regardless of their protected characteristics, with *several definitions of research* so that they can determine at what point their work within the creative disciplines is considered 'research' – for example where data is actively collected from human participants and used.
- 4) Outlining in clear language the *obligations and responsibilities* of PGT student researchers at GSA.
- 5) Clearly listing the likely *ethical issues* to which the policy relates, and relating this to the Equality Act and specific issues that may arise with respect to age or disability, including social and cultural concerns that may arise in certain communities. For example, the Code of Practice encourages researchers to make provision for participants' abilities wherever possible e.g. take consent orally if a potential participant is visually or physically impaired, take account of differences in language skills etc.
- 6) Describing the constitution and remit of the PGT Ethics Committee, for Stage II Ethical clearance and its responsibilities to the student.
- 7) Outlining the procedures for gaining ethical approval including providing a visual diagram to illustrate the process so that it is clear and accessible for all, including protected characteristic groups.
- 8) Outlining the process for reporting of Ethical applications and ethical issues to the institution.
- 9) Accompanying the GSA Research Ethics Policy, is the *Code of Practice*. This document outlines the principle that research must be free from harm, is balanced and protects both researcher and research participant. Specific reference to *balance* is made in 3.5 (of the Code of Practice) with the additional stipulation that no portion of society should be unreasonably burdened. For example, continually working with children from a particular school.
- 10) We also make specific reference to *pedagogic research* and the possible inequalities in power relationships we felt to be significant. For example, students working with their peers as co-researchers within the same class, or with their tutor (who will also be assessing their work).
- 11) The procedure for assessing research ethics applications is free from the constraints of timetabled meetings. Whilst the PGT Ethics Committee is committed to meeting once per year in person, applications will be largely reviewed by email ensuring a timely and open service for all PGT student

researchers, thus not disadvantaging part-time students or indeed staff who are part-time (who are supervising their students in putting through a full ethics application).

NEGATIVE IMPACTS

1. Whilst the PGT policy stipulates the need for balance in the inclusion of human participants, the nature of research projects can exclude groups, potentially affecting protected characteristics;
2. Students may use modest incentives for gaining participation. Whilst these are subject to the Bribery Act of 2010, use of these could still create an equalities issue.

Summary of the actions you have taken or plan to take as a result:

No	Action	Equality Impact	Lead	Deadline
1	Staff PGT ethics inductions for all schools	Staff are supported to consider equality and diversity as part of the ethical assessments of their students' research activities.	Senior Academic Fellow in Digital Learning	Completed Feb 2017- June 2017
2	Professional development sessions for UG and PGT staff	As part of the ethics training, address the three needs of the PSED, providing positive equality impact for students across all protected characteristic groups	Senior Academic Fellow in Digital Learning	Completed April –June 2017 Going forward, to be provided each semester
3	School level/programme level ethics inductions for students	As part of the ethics training, students are supported to consider equality and diversity in their research activities.	Senior Academic Fellow in Digital Learning in conjunction with programme leaders	Completed Feb-May 2017 To be conducted annually at the start of the new academic year
4	Ethics Guidance Document	Advancing equality and fostering good relations through embedding equality and diversity consideration within all research activities.	Senior Academic Fellow in Digital Learning	Completed To be updated/revised annually – Aug 2018
5	Ethics Toolkit	Advancing equality and fostering good relations through embedding equality and diversity consideration within all research activities.	Senior Academic Fellow in Digital Learning	Completed To be updated/revised annually – Aug 2018
6	Review of policy and processes with staff and students and make	Enhanced student engagement with	Senior Academic	To be monitored annually - Aug

	enhancements based on feedback	learning opportunities, Enhance opportunities for subsequent revisions of policy and ethical assessment forms.	Fellow in Digital Learning	2018
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Summary of what you anticipate will change as a result of your actions and where/when these will be reported and reviewed:

The policy is reviewed on a regular basis as part of GSA’s Committee and Governance Structure. Any updates to the policy or enhancements to the associated documentation will be reported through this mechanism. For example, reviews and updates will communicated to Boards of Studies and UPC.

How will these changes contribute to the delivery of GSA’s equality outcomes:

The actions highlighted above will contribute to the delivery of [GSA equality outcomes](#) in a number of ways identified below:

Equality Outcome 1: An organisational culture in which respect for self and others is understood and practiced, and where identity-based ignorance or prejudice is challenged and confidence promoted.

The Policy specifically addresses equality Outcome 1, which is to support and develop a curriculum that explicitly engages with the personal and political dimensions of diverse identities and develops student confidence in engaging ethically with issues of diversity and equality in their work with others where research is involved.

Equality Outcome 2: An inclusive and accessible environment in which the diverse needs of students are systematically anticipated and provided for

The policy is designed to positively influence the development of curricula across the disciplines through the development of an inclusive and accessible environment for all and by introducing and/or enhancing opportunities to discuss issues related to social engagement with diverse communities and groups and the awareness of difference and working with difference. In addition to staff and student training (offered centrally and also offered by individual Schools), Students and staff are actively encouraged to seek individual advice/support via email or in person from the Learning and Teaching team should they require it.

The outcome of your assessment:

- No action – no potential adverse impact
- Amendments or changes to remove barriers/promote positive impact
- Proceed with awareness of adverse impact

**Sign-off, authorisation and publishing
Review Lead**

Name	Maddy Sclater
Position	Senior Academic Fellow in Digital Learning
Signature	Maddy Sclater
Date	21/8/17

Executive Lead

Name	Vicky Gunn
Position	Head of Learning and Teaching
Signature	Vicky Gunn
Date	21/8/17

Equality Lead (Head of Student Support and Development)

Signature	Jill Hammond
Date	28/08/17