



University of Glasgow | College of Arts



## **College of Arts Research Ethics**

### **Guidelines for Applicants and Supervisors**

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## 1) INTRODUCTION

### 1.1) Introduction

This document is intended to help you complete an application for ethical approval for research in the College of Arts. Scholarly activity in the Arts and Humanities is remarkably diverse, dealing with living participants as well as cultural artefacts and written materials. Reflecting on the ethical implications of our research activity involves a considered evaluation of its problems and benefits. We examine the implications for our conduct and working of the respect rightfully owed to our fellow human beings, as well as the care we should show with regard to the fruits of their labour, creativity and curiosity. We aim to treat participants as we would wish to be treated ourselves. In that regard, inquiry into individual experiences, the nature of societies and the world's cultural heritage is fundamentally an ethical enterprise. Our recognition of that duty is also mirrored by the legal privileges universities claim with regard to the handling of data. This is mainly why these guidance notes are as long as they are, reflecting the serious nature of the business at hand and the massive variety of research focuses and approaches. That said, don't panic. There is no reason to feel bewildered or intimidated: not everything here will relate to your application. Rather, it is a case of picking through the relevant sections and advice, an exercise that should help give a picture of how your work relates to broader principles, as well as how it is similar to or distinct from the methods and interests of others.

### 1.2) How to make an application

Applications should be submitted via the UofG [Research Ethics System](#). The UofG pages provide guidance and support relating to use of the system. If you are new to the process, you will need to request access, which can be done by submitting a request to IT services via their help portal.

### 1.3) Basic principles: HE UK context

Ethical principles underpin all work conducted under the aegis of UK research councils and other funding bodies. Monitoring of the conduct of research is required by law and is a condition of support by UK research councils and other funding bodies.

The Research Organisation is responsible for ensuring that ethical issues relating to the research project are identified and brought to the attention of the relevant approval or regulatory body. Approval to undertake the research must be granted **before any work requiring approval begins**. Ethical issues should be interpreted **broadly** and may encompass, among other things, **relevant codes of practice**, the **involvement of human participants**, [...] and the **use of sensitive economic, social or personal data**.<sup>1</sup>

Our six key principles for ethical research are:

1. Research should aim to maximise benefit for individuals and society and minimise risk and harm.
2. The rights and dignity of individuals and groups should be respected.
3. Wherever possible, participation should be voluntary and appropriately informed.

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<sup>1</sup> UKRI/ Research Councils UK, 'Terms and Conditions of Research Council Training Grants' [accessible [here](#)], p. 10, emphasis added.

4. Research should be conducted with integrity and transparency.
5. Lines of responsibility and accountability should be clearly defined.
6. Independence of research should be maintained and where conflicts of interest cannot be avoided they should be made explicit.<sup>2</sup>

The implications for our work in the University are various:

- Ethical considerations pertain to the design and conduct of research, as well as the use of findings.
- Understanding of and due compliance with ethical frameworks can be listed as part of your ‘transferable skills’.
- Staff and students should be aware that failure to seek clearance can leave researchers without institutional support (notably insurance and legal cover) and potentially liable in case of external complaint. Data gathered without approval may not be used. For UG and PGT students, instances of misconduct are dealt with via Senate Office as a breach of academic conduct. For staff and PGR students, issues are handled under Research Integrity (RI) procedures. See further below (‘Breaches and Misconduct’).

#### 1.4) Do you need to make an application?

Where research involves human subjects or data not in the public domain then ethical approval, centring on a statement of ethical principles and protocols, must be sought.<sup>3</sup> As part of diligence requirements, the College needs to ensure that applicants show appropriate awareness of key issues and regulatory frameworks.

1. If the researcher is interviewing or observing participants then that counts as ‘involving human subjects’. ‘Interviewing’ means that you are recording the person’s words, by writing, as audio or any other means, and using them in your work.
2. Staff, whether as applicants or supervisors, should be mindful of the implications and terms of UK General Data Protection Regulation (UK GDPR) as well as the corresponding UK Data Protection Act 2018. In this regard, colleagues are expected to have completed the UofG online GDPR and Information Security training modules accessible via MyGlasgow.<sup>4</sup>
  - a. Researchers and supervisors are expected to be cognizant of issues relating to the ‘lawful basis’ for processing data.<sup>5</sup> Since the lawful basis of ‘consent’ allows for participants to withdraw permission even after publication, approval is based on the premise that the lawful basis of the research constitutes a ‘task in the public

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<sup>2</sup> ESRC, ‘Our Core Principles’ [click [here](#) for source].

<sup>3</sup> See ‘What Needs to Go in the Ethics Statement?’, in the *Research Ethics Guidebook* [click [here](#) for access]. In terms of what constitutes ‘research’, approval should also be sought with regard to work with UofG student participants in support of scholarship where outputs are envisaged. Surveying for internal QA or course development/ enhancement purposes does not fall within the remit of the Ethics Committee.

<sup>4</sup> See UofG guidance on [GDPR](#) for further information. On UK GDPR, see guidance from the Information Commissioner’s Office (click [here](#)). For the full text of the EU General Data Protection Regulation (EU GDPR), click [here](#). For the text of the UK Data Protection Act, click [here](#). Although an application would not automatically fail where it emerged a supervisor had not completed GDPR training, the expectation that members of academic staff should have done so is arguably not unreasonable given that the same is a mandatory requirement under PDR. Were a data processing issue to arise with a PG or UG application where the supervisor had not completed training, this could be noted as a point of concern.

<sup>5</sup> See UofG guidance on [GDPR](#) for further information.

interest'. This is in accordance with the UKRI interpretation of UK GDPR, which indicates this as the appropriate basis for HE research, a position echoed in statements from UK universities.<sup>6</sup> For further guidance, see the relevant sections below.

- b. A key distinction under UK GDPR is that between **personal data** (name, address, DOB) and **special category personal data** (information relating to ethnicity, religious beliefs, health or genetic profile, sexual orientation and activity, union membership, criminal offences and convictions).
  - c. Note that the provisions of UK GDPR pertain to data processing only – not to the conduct of fieldwork. In that respect, in common with practice elsewhere in the University, we continue to secure **informed consent** with regard to participation in the fieldwork activities associated with research projects.<sup>7</sup> This distinction should be clearly highlighted in all participant materials. See the template digest document for examples.
3. 'Data not in the public domain' means data (or objects) which are still in copyright, or are in private collections, and for which written permission for use must be obtained.
  4. Ethical scrutiny is particularly important where research involves children (the University holds this to be under 18) or other vulnerable individuals.
    - a. PGT and PGR applicants proposing to work with schoolchildren must check clearance and approval arrangements for the relevant local authorities. In the case of Glasgow City schools, access requires prior approval by the Education Services Research Group (ESRG), which meets at various points over the course of the year.<sup>8</sup> Applications must be submitted at least a week in advance of meetings. Applicants have no right of appeal regarding outcomes.
    - b. Applicants intending to work with participants under 18 or other vulnerable individuals must review the University's 'Safeguarding Policy'.<sup>9</sup> If a researcher becomes aware that a child or vulnerable young adult is being harmed or at risk of harm, it is a statutory requirement that s/he follow UofG guidance on reporting procedures and recommended behaviour.<sup>10</sup>
    - c. As regards vulnerable adult groups more generally, there are two slightly different definitions of vulnerability to bear in mind.
      - i. The first is as per the Protection of Vulnerable Groups (Scotland) Act 2007 and applies to any individual in receipt of medical care or 'welfare services' (including support, assistance, advice or counselling).<sup>11</sup>

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<sup>6</sup> See UKRI, 'GDPR and Research: An Overview for Researchers', accessible [here](#). For examples of other institutions offering guidance based on that position, see University College London, 'Guidance for Researchers on the Implications of the General Data Protection Regulation and the Data Protection Act 2018', accessible [here](#); University of Oxford, 'Data Protection and Research', accessible [here](#); University of Edinburgh, 'Data Protection Handbook', accessible [here](#).

<sup>7</sup> The same distinction is noted in guidance from UCL: 'It is important to note that when we talk about consent as a legal basis, we are referring to only that – the legal basis – we are not referring to "ethical informed consent" which will still be required in addition to the legal basis.' (UCL, 'Guidance for Researchers', p. 2).

<sup>8</sup> For information and forms, see Glasgow Council guidance accessible [here](#).

<sup>9</sup> Information and relevant documentation on UofG safeguarding policies and protocols are accessible [here](#).

<sup>10</sup> See the UofG Safeguarding pages for [flowchart](#).

<sup>11</sup> See [here](#) for the text of the Act.

- ii. The definition under UK GDPR is more expansive, also including employees, vulnerable members of the community (e.g. asylum seekers) and, more generally, ‘any case where an imbalance in the relationship between the position of the data subject and the controller can be identified’.<sup>12</sup>
5. The University is required to ensure that research involving work on extremism or terrorism in the UK complies with guidance on security-sensitive subjects based on the ‘Prevent Duty’ outlined as part of the Counter-Terrorism and Security Act 2015. Researchers should read carefully the advice provided by UUK on precautions and conduct in this area.<sup>13</sup> As UUK note, one key aim here is to avoid ‘misinterpretation’ of research activity by the security services. That said, it is clear that definitions of extremism and terrorism are not ideologically neutral, and that any chilling effect on research relating to areas of legitimate dissent should be regarded as unwelcome.

In the case of PG or UG students, the supervisor is required to oversee and support the application process and help with the preparation of materials.

- Supervisors and conveners should have completed online GDPR and Information Security training.
- Supervisors should make sure that students are aware of ethical issues and have read the College’s Ethics Policy. See <http://www.gla.ac.uk/colleges/arts/research/ethics>.
- All supervisors must give particularly careful consideration to PG and UG research in sensitive areas (e.g. on issues such as drug or alcohol use, criminality or sexuality etc.), referred to under UK GDPR as ‘special category data’.<sup>14</sup> If a supervisor supports an undergraduate student’s research in this kind of area then a case must be made to the Ethics Committee explaining: 1) why the topic is important to the student’s learning; 2) how it reflects the intended learning outcomes of the course; 3) why the project cannot be carried out using data already in the public domain. For UG and PGT applications particularly, very specific and compelling justification is required. Student applicants and supervisors should include a note of any relevant experience and expertise in the field of study on the application form.

The completed application form and accompanying materials should be submitted online through the University’s Research Ethics System ([login](#) via the University’s Business Systems).

### 1.5) Understanding/ identifying ‘harm’ and ‘risk’

In order to avoid harm, all applications are required to identify and address potential areas of risk.

1. In large part, the understanding of the nature and degree of ethical risk is modelled on guidance associated with medical and social science research, one very helpful source here being the ESRC *Research Ethics Guidebook*.<sup>15</sup> The most significant factors here are associated with vulnerable groups or particular conditions or behaviours. It is worth

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<sup>12</sup> For further information, see ‘Guidelines on Data Protection Impact Assessment (DPIA)’, p. 10 (accessible [here](#)).

<sup>13</sup> For UofG guidance, see [here](#).

<sup>14</sup> For detailed information from ICO, click [here](#).

<sup>15</sup> In the *Research Ethics Guidebook*, see ‘How is Risk Defined?’, [click [here](#) for access]; ‘How is Harm Defined?’ [click [here](#) for access] and ‘How to Assess Risk, Harms and Benefits’ [click [here](#) for access].

noting that at the other end of the scale, another factor identified is potential boredom: participants will be less engaged if the research seems trivial or uninteresting.<sup>16</sup> A large proportion of Arts proposals also deal with human subjects. However, since the College is not immediately engaged in training psychologists, counsellors, teachers or social workers (though many Arts graduates do go on to pursue vocational training in these areas), and since most programmes in Arts do not incorporate training in ethical matters, our approach to evaluating risk is relatively cautious.

2. Another aspect to risk is the security and confidentiality of data. You should refer to the University's information risk classifications.<sup>17</sup> Discussions and policy pertaining to standards and protocols here (especially with regard to encryption of confidential data for the purposes of storage and/or transfer) are evolving, with benchmarking for what are referred to as 'Trusted Research Environments' underpinned by reference to international standards (notably as specified under ISO/IEC 27001).<sup>18</sup>
3. Potential risks to researchers should be identified and mitigated. Applicants are expected to be appropriately mindful of their personal safety in the conduct of fieldwork (details of protocols are included below, with guidance also available from UofG Health, Safety and Wellbeing).<sup>19</sup> There are also potential issues of individual/ institutional reputational damage and liability exposure, whether associated with breakdowns in relations between researchers and participants or with poor research practice.
4. A smaller proportion of applications in Arts deal with cultural/ discursive artefacts (a.k.a. 'inanimate subjects'). In this case, 'harm'/ 'risk' can be understood as (potential for) damage to evidence or contributing to incorrect understanding of evidence.
5. Note that while the application process is primarily concerned with issues of harm, UKRI guidelines indicate that maximisation of benefit is an ethical consideration.<sup>20</sup> Applications may include brief comment on questions of benefit. However, for the purposes of applications here the principal focus is mitigation of potential harm: potential benefits do not in and of themselves outweigh this.

## 1.6) Characterising your project

Framing your application should give you a picture of the nature of your project.

- What happens when? You will find it helpful to have a clear sense of your project's timeline, particularly with regard to the processing of research data. This may have implications for when or whether participants can withdraw from a project. Notably, once data is anonymised in GDPR terms, the researcher should not be able to identify individual contributors, so those taking part need to be clearly advised of any cut-off dates.
- What risks are associated with the project, whether for participants or the researcher? What levels of probability and severity are involved? You should also consider the project in terms of UofG [information risk classifications](#).

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<sup>16</sup> This is a point emphasised, for instance, in the Glasgow City Council schools guidance leaflet, 'Get Your Facts Right: A Guide to Involving Young People in Social Science Research' [click [here](#) for access].

<sup>17</sup> See [here](#) for UofG guidance.

<sup>18</sup> For further ISO information, see [here](#).

<sup>19</sup> See the [Health, Safety and Wellbeing](#) webpages and notably their '[Lone Study Procedure](#)' guidance/ template (also included below as Appendix 1).

<sup>20</sup> See 'How is Benefit Defined?', in the *Research Ethics Guidebook* [click [here](#) for access].

- If the research involves living participants, what is the projected size of the sample? How usefully representative is it? What bearing does this have on the handling of the data?
  - Larger projects: Anonymous participation/ anonymization is the norm here. The researcher will typically have very little direct contact or continuing relation with the participants. The research may have a quantitative dimension.
  - Medium/ smaller projects: Anonymous participation/ anonymization remains the default here. Where use of pseudonyms is deemed appropriate, this is on the basis that it is useful/ appropriate to the research to characterise participants as individuals while not revealing their identities – data are therefore not aggregated.<sup>21</sup> However, the measure in which statements, views and actions are attributed to a single individual means that the ‘natural person’ is potentially identifiable behind the ‘research subject/ participant’. Any potential risk here should be carefully evaluated. There will typically be greater qualitative emphasis or comment on the particularities of individual responses on specific points.
  - Small-scale projects: Higher risk projects here may touch on sensitive/ trigger issues, meaning anonymity is essential. At the lower end of the risk spectrum in Arts and Humanities, projects may involve creative practitioners or professionals. The option of named participation may be appropriate or even desirable here, especially where participants are themselves involved in research, public engagement or policy-making, and so it is to their benefit either to consolidate their profile in discussion or assert intellectual property with regard to practice / innovation.

### **1.7) Class or group applications**

If the nature of research being undertaken by a number of students in a UG/PG class is similar and where an element of ethical training is part of the course materials, then the supervisor can make one application for ethical approval for the whole class. For instance, if all students in a class are intending to conduct interviews or use questionnaires, then the methodology is the same, so one class application can be submitted.

1. Conveners should ensure that all the students are aware of the ethical issues associated with their field.
2. Conveners must have completed UofG GDPR and Information Security training (please confirm accordingly in the application) and have read the College guidelines.
3. Conveners must have reviewed the UofG safeguarding policy and considered any potential safety risks (e.g. lone study/ remote working).
4. Where students in the cohort are pursuing projects outwith the scope of the methodology covered in the class application, they should submit a separate application.
5. Any projects dealing with sensitive issues or material will typically require a separate application.

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<sup>21</sup> Basically, a list of pseudonymous participants is rather like a dramatic cast: if it grows beyond a certain size, things are likely to become confusing. This may be a sign that the handling of the evidence needs to change. On aggregation/ disaggregation, see <https://www.edglossary.org/disaggregated-data/>.

## 2) OVERVIEW OF APPLICATION PROCEDURE

1. If you're new to the process, request access to the [Research Ethics System](#).
2. Fill in the Checklist (Section A of application form).
3. Fill in the **Application Form** paying special attention to Section C. This part of the form is the counterpart of the Checklist and should provide a detailed account of how you will address any risks identified. Note that this is not simply a summary of the project. In this section you should also indicate any relevant clearances (e.g. if you already have PVG clearance or have completed UofG online GDPR training).

The following documentation may also be needed, depending on the nature of the research. For student applicants, prepare drafts of these and get your supervisor to check them.

4. An **outline** of the project. In the case of applications relating to dissertation projects, this can be the outline submitted as part of your dissertation course.
5. A **participant information sheet**. This is a short briefing that explains the project and its rationale in terms that will be clear to potential participants. This is also sometimes referred to as a 'plain language statement', which is a reminder that talking to different groups can present challenges in terms of communication skills.
  - a. Generally speaking, where dealing with printed questionnaires and so on, this should be separate from the consent form so that participants can take the information away afterwards (notably to decide whether they want to withdraw). For online surveys, the participants should see the information (either online or as an email) before they enter the survey platform.
  - b. For projects abroad or dealing with minority groups in the UK, it may well be necessary to provide translations of the participant materials. This should be done after the project is approved. The translator should be suitably qualified, with the linguistic and cultural competence and understanding necessary to handle both issues of register and also the legal aspects. Ideally, you should also be able to identify someone suitable (preferably a member of UofG academic staff) to check the translation.
6. A **participant agreement form (a.k.a. 'consent form')**. Sample agreement forms are included in the digest of templates.
7. A draft questionnaire (if interviewing) or a clear description of the content of the questionnaire if creating it as part of your research. Depending on the nature of the exercise and the participant group, this may be structured, semi-structured or open. For interviews, where dealing with larger samples of participants or any sensitive issue, a degree of structure is preferable as this allows participants advance view of questions and allows them to judge where they would prefer not to offer a response.
8. You may also ask the University's Data Protection and Freedom of Information office (DPFOI) to help you prepare a '**privacy notice**'. This statement can be incorporated into the consent form. For guidance, click [here](#). This document explains the conditions for data processing. Note in particular that in GDPR terms the 'lawful basis' for most research projects will be 'task in the public interest' rather than 'consent' – the DPFOI templates offer options for various bases.
9. If the research involves keeping what is referred to under UK GDPR as 'personal data' (i.e. details of participants which could identify them, e.g. names, addresses, email addresses

- etc.) and particularly ‘Special Category Personal Data’, then you should complete a **data protection impact assessment**. Guidance is available from the DPFOI (click [here](#)).
10. Vulnerable Groups: As note above, applicants intending to work with children or vulnerable adults must show cognizance of the relevant legal and procedural frameworks as outlined in the Protection of Vulnerable Groups (Scotland) Act 2007 and General Data Protection Regulation (GDPR).<sup>22</sup> If any participants are under 18 and if the researcher will be in sole charge of them at any time, a Protection of Vulnerable Groups (PVG) scheme membership must obtained before the research starts.<sup>23</sup> The PVG certificate should not be submitted with the ethics approval application but should be retained by the researcher. *For applications from within Arts, this will only apply in atypical cases. You don’t need to apply for PVG scheme membership as long as a supervising person who is a) a relevant professional/ part of a relevant PVG scheme, b) a parent/ guardian, or c) an adult delegated to act as a gatekeeper is present at all times.*
  11. Applicants should detail how any relevant copyright permissions are to be sought. See the UofG guidance on copyright accessible [here](#).
  12. Upload your application and other materials through the University’s Research Ethics System ([login](#)). You should do this at least **four weeks** before your research is projected to begin.<sup>24</sup> Although straightforward applications can sometimes be dealt with in as little as two weeks (and sometimes less), more complex cases take longer. Note that staff and PG applications require **two** reviewer reports. Also bear in mind that if an application is deemed to require ‘major changes’, the revised version will be returned to the original reviewers.
  13. If you’ve left things a bit late... PG/ UG applicants: tell your supervisor/ convener and ask them to contact the Ethics Officer. Staff applicants should contact the Ethics Officer directly.
  14. Most correspondence will be conducted via the Ethics application system. Beyond that, use your **UofG email address** in any correspondence with us, with your supervisor and (normally) with interviewees and others involved in your research.<sup>25</sup> Include your application number in the subject line of all emails regarding your application.

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<sup>22</sup> See [here](#) for the text of the Act. Note that a vulnerable adult is defined as anyone in receipt of medical care or ‘welfare services’ (including support, assistance, advice or counselling).

<sup>23</sup> See [here](#) for UofG guidance re PVG clearance.

<sup>24</sup> If an indicative schedule is included, please indicate accordingly.

<sup>25</sup> There are exceptions to this rule, notably where security considerations make it advisable to use other messaging platforms, such as WhatsApp or ProtonMail. See further below.

### 3) THE APPLICATION FORM

#### 3.1.1) Application checklist (Section A)

The first section of the application form consists of a checklist of ethical issues outlining potential areas of risk.

<i>Please answer each question by ticking the appropriate box:</i>	YES	NO
<b>Does the research involve human participants?</b>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Does the research involve 'personal data' as defined under GDPR?</b> (see guidelines)	<input type="checkbox"/>	<input type="checkbox"/>
<b>Does the research involve 'special category personal data' as defined under GDPR?</b> (see guidelines)	<input type="checkbox"/>	<input type="checkbox"/>
<b>Does the research involve data not in the public domain?</b> (i.e. data still in copyright or materials in non-public archives/ with conditions attaching to their use)	<input type="checkbox"/>	<input type="checkbox"/>
<b>Are public domain outputs envisaged?</b> (e.g. publications, exhibitions, materials posted via social media)	<input type="checkbox"/>	<input type="checkbox"/>
<b>Does the study involve people in a dependent relationship, minors, or vulnerable people who may be unable to give informed consent?</b> (e.g. your own students, children, people with special needs) If your research involves minors or vulnerable subjects, please explain why this contact is needed and the ways in which you intend to fully protect the interests of such subjects.	<input type="checkbox"/>	<input type="checkbox"/>
<b>Will the study require the co-operation of a gatekeeper for access to participants?</b> (e.g. teacher, local authority representative)	<input type="checkbox"/>	<input type="checkbox"/>
<b>Does the project involve observation of participants?</b> (e.g. in museums, galleries or municipal amenities or places of entertainment)	<input type="checkbox"/>	<input type="checkbox"/>
<b>Will it be necessary to conceal from participants the aims of the research at any point?</b> (e.g. where prior awareness could influence participant responses)	<input type="checkbox"/>	<input type="checkbox"/>
<b>Will the study involve discussion of sensitive topics?</b> (e.g. sexuality, drug use) If you answer YES here, refer to the detailed list of sensitive/ trigger issues in the Guidelines for Applicants and outline specific issues in Section C.	<input type="checkbox"/>	<input type="checkbox"/>
<b>Could the study induce psychological stress or anxiety or cause harm or negative consequences beyond risks routinely encountered?</b> See Application Notes below for an indicative list of potential trigger issues.	<input type="checkbox"/>	<input type="checkbox"/>
<b>Are there issues of safety for the investigators or subjects?</b>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Will financial inducements (other than reasonable expenses and compensation for time) be offered to participants?</b>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Are there issues of confidentiality?</b> (including third-party involvement)	<input type="checkbox"/>	<input type="checkbox"/>
<b>Are there issues of security?</b> (e.g. data storage security)	<input type="checkbox"/>	<input type="checkbox"/>
<b>Are project data to be retained as part of a 'legacy dataset'?</b> (Staff applications only)	<input type="checkbox"/>	<input type="checkbox"/>
<b>Are there issues of balance?</b> (e.g. cultural, social or gender-based characteristics of the research subjects affecting the design of the project or its conduct)	<input type="checkbox"/>	<input type="checkbox"/>

The checklist helps applicants to determine whether an application for ethical approval is necessary.

- Review the **checklist** issues carefully. Have you identified and indicated all potential issues?
- Respond carefully under Section C on the application, explaining clearly how you will deal with all issues flagged up on the checklist. Reviewers are prompted to check the fit between these sections.

### **3.1.2) Re Section A: sensitive/ trigger issues**

Are any of the following topics to be explored in the research? If so, please comment where relevant under Section C.

- sensitive personal issues
- sensitive cultural issues (e.g. experience of military conflict/ civil unrest; extremism; persecution)
- children and young people
- parenting
- race or ethnic identity (or attitudes and conflict associated with these)
- grief, death or serious/ traumatic loss
- depression, mood states, anxiety
- gambling
- eating disorders
- illicit drug taking/ substance abuse
- suicide/ attempted suicide/ self-harming
- anger management
- impulse control
- self-esteem
- any psychological disorder
- self-report of criminal behaviour/ extremism/ radicalisation
- participant(s) being asked to provide information relating to another person (including potential issues of incrimination)
- gender identity
- sexuality and sexual health
- any disease or health problem
- (in)fertility
- termination of pregnancy
- domestic violence
- divorce or separation
- elderly neglect
- adults abused as children
- any related or pertinent topic of possible concern

### 3.2) Applicant Details (Section B)

#### 3.2.1) Re Section B8

Include here a one-paragraph **summary** of the project (in academic style) – this is to give the reviewers an overview of the project. It is a key aspect of your researcher development that you demonstrate an appropriate command of both scholarly writing and plain language conventions. If you are including a dissertation outline or project proposal with your documentation, you may refer to that.

#### 3.3) Ethical issues: risks and mitigation

In sections C1-C3 please indicate **ALL** ethical issues and areas of significant risk identified in the checklist above, as well as any further ethical issues associated with your research. How do you plan to address these and mitigate any potential risks? (You may use headings if that helps organise things more clearly.) Further notes and explanations to the various sections are available at the end of the form. Please read these carefully and structure your responses accordingly.

- In addition to College advice, you should consult UKRI ethical policy statements along with guidance from funding and professional bodies. These can be accessed via the links included in this document.
- You should consult University guidance on compliance with UK [General Data Protection Regulation](#) (UK GDPR). It is expected that staff, whether as applicants themselves or supervisors, will have completed UofG online GDPR and Information Security training.<sup>26</sup> See also further below.
- In your comments, please indicate any training you have in relation to research ethics, including details of Research Integrity training, as well as any relevant clearances (e.g. PVG) or professional affiliations/ experience/ qualifications. You should also reference any pertinent sources regarding research/ fieldwork methodology.

It is not impossible that some projects will involve both human subjects and cultural artefacts, so your responses may be divided between the various sections. In terms of length, between sections C1 and C2, your responses may amount to about a page overall. Your response under C3 will probably be rather shorter.

#### 3.3.1) Re Section C1. Non-clinical research involving human subjects

Please address the following points as part of your commentary in this section:

1. How will living participants be involved in the project and how will their interests be protected? You should detail measures and protocols relating to the safety of both participants and researchers. This aspect includes the appropriate use of plain language materials, and the consideration of securing properly informed consent (or agreement regarding public task remit).
2. Indicate by what means potential participants will be identified and approached.<sup>27</sup>

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<sup>26</sup> Note that these are normal requirements for UofG staff in any event.

<sup>27</sup> Reviewer consideration here may focus on the nature and size of the sample. However, it is not impossible that the means of approach may raise issues of sensitivity. For instance, it would be inappropriate to use a Facebook/ WhatsApp group offering support for individuals with health/ mental health issues to circulate an

3. What supporting materials (participant information and consent/ agreement forms) have you prepared? Are translations of any materials required, and if so how will these be produced and verified as accurate?
4. Outline any potential issues regarding consent/ agreement to participate.<sup>28</sup>
  - a. Do all participants have the competence or **capacity** to consent/ agree? This requires consideration of issues such as age, maturity, cognitive ability and so on.
  - b. Are the subjects students, or others in a **dependent relationship**? If so, be mindful of avoiding potentially **coercive** positions.
  - c. Does the research include children or vulnerable adults (i.e. as per the statutory definition comprising individuals in receipt of medical care or welfare services including support, assistance, advice or counselling)? If so, special guidance and/or basic-level **Protecting Vulnerable Groups (PVG)** certification may be required or useful as reassurance. (UG applicants: a standard solution here is to arrange to work under professional supervision.)
5. There are various possibilities regarding online surveys.
  - a. Staff and students can readily construct and administer online surveys via Office 365.<sup>29</sup>
  - b. Where more complex/ extensive surveys are necessary for staff/ PG projects, these can be conducted via UofG institutional access to [onlinesurveys.ac.uk](https://onlinesurveys.ac.uk).<sup>30</sup>
    - i. The University Research and Innovation office will arrange access and support once ethical approval is granted. Contact details will be provided in approval letters. R&I will require confirmation that the project has received UofG ethical clearance.
    - ii. For PGT/ PGR projects, the supervisor is the Principal Investigator. The student constructs the survey as a 'draft', which is then checked and launched by the supervisor.
  - c. Where surveys require languages/ scripts (e.g. Arabic, Chinese) not supported by [onlinesurveys.ac.uk](https://onlinesurveys.ac.uk), alternatives such as [surveymonkey.com](https://surveymonkey.com) or [typeform.com](https://typeform.com) may be used subject to permission.<sup>31</sup> However, note that the rationale for preferring Office365 and [onlinesurveys.ac.uk](https://onlinesurveys.ac.uk) is that this means the University retains oversight and control of the data.
  - d. A draft of any survey questions must be uploaded with other application materials.
6. There are various ethical issues associated with interviewing and other fieldwork.
  - a. Oral history is an area of considerable discussion. Projects in this area should show awareness of relevant guidelines.<sup>32</sup>
  - b. It is important that procedures for interviews are given **in writing** to the participants.

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invitation to participate in a survey: unjustifiable stress/ anxiety may result from members feeling inappropriately targeted.

<sup>28</sup> See 'What do I need to know about informed consent and confidentiality' (Sage Research Methods) and formerly 'Consent', in *The Research Ethics Guidebook*.

<sup>29</sup> Log in to Microsoft Office via <https://www.gla.ac.uk/myglasgow/it/office365/> and go to 'Forms'.

<sup>30</sup> There is currently no arrangement for an [onlinesurveys.ac.uk](https://onlinesurveys.ac.uk) licence for undergraduate projects.

<sup>31</sup> For reasons of data confidentiality, we had previously been mostly advising against use of [surveymonkey.com](https://surveymonkey.com), though the platform later updated its data processing practices in light of EU GDPR.

<sup>32</sup> See notably advice from the Oral History Society (click [here](#) for website). See in particular the materials under the pages '[Is your oral history ethical and legal?](#)'.

- c. Means of communication should be appropriately secure for the purposes of confidentiality and safety. Normal email is significantly vulnerable in that regard.<sup>33</sup>
  - d. Interviewees have to be happy with the location of the interview, and should be offered alternatives (public/private).
  - e. Researchers should also be comfortable with the location proposed.
  - f. You must not **mislead** an interviewee at any point.<sup>34</sup>
  - g. You must not place an interviewee in a position of **incriminating** themselves.<sup>35</sup> Be very circumspect with regard to assurances regarding confidentiality in this regard as it is now a statutory requirement that information relating to criminal, terrorist or extremist activity be passed on to the security services.
  - h. Detail and justify any use of incentives or compensation.<sup>36</sup>
  - i. Recorded contributions – in written form, as audio or in notes taken from the interview by the interviewer – may only be used **in accordance with the wishes of the interviewee**.
7. Where research involves use of locations such as national sites, municipal amenities, venues or places of work, indicate what permissions have been sought, especially with regard to observation.<sup>37</sup> You should indicate whether recording of any kind is to be involved.<sup>38</sup>
  8. Research involving social media should take account of guidance in this area.<sup>39</sup> Guidance and standards here are evolving rapidly. One key aspect is the measure in which users of particular platforms would expect privacy or not. This may require taking user perceptions into account: while a Facebook chat group might in fact be public domain, participants may think of the forum as closed.
  9. Researchers making use of photography are advised to make use of the resources and advice provided by the Photography Ethics Centre.<sup>40</sup>

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<sup>33</sup> Where security of communication is a consideration, bear in mind that email is less secure than other means such as WhatsApp messaging or ProtonMail.

<sup>34</sup> It is sometimes useful/ appropriate to conceal the purpose of a piece of research in cases where knowledge may condition participant behaviour -- for instance, in the field of sociolinguistics, where knowing why a question is being asked may influence responses. In such cases, you should indicate in the participant information that an account of the rationale for the research will be made available once the survey/ interview has been completed.

<sup>35</sup> For example, historians working on Northern Ireland can ask interviewees about their experiences of The Troubles, but not about paramilitary involvement. Discussions here have focused notably on the case of the Boston College Archive (click [here](#) for coverage from bbc.co.uk). Likewise, researchers dealing with cultural artefacts should be very circumspect with regard to any discussions of trafficking.

<sup>36</sup> In any PG/ UG projects, incentives should be carefully discussed with supervisors. They must be appropriate in character and value as well as clearly outlined to participants. In terms of their nature and value, they should not influence the contributions or indeed induce participants to take part against their better judgement. Generally speaking, travel expenses and similar remuneration are not regarded as incentives.

<sup>37</sup> Observation of individuals who have not been advised is classed as 'covert', a practice now strongly discouraged and only permitted under exceptional circumstances.

<sup>38</sup> N.B. in the UK recording/ filming/ photography of schoolchildren without express permission from their school is illegal. Schools secure detailed permissions for individual pupils before the start of the academic year.

<sup>39</sup> See Leanne Townsend and Claire Wallace, 'Social Media Research: A Guide to Ethics' [accessible [here](#)].

<sup>40</sup> See [here](#) for website.

10. Research relating to animals and animal welfare is expected to show cognizance of guidelines and key issues in the area.<sup>41</sup> The expansion of ethical consideration beyond a narrowly human-centred focus has also focused attention on AI and robotics.<sup>42</sup>
11. Indicate the processes for handling interview and survey data (i.e. pertaining to and distinguishing anonymous/ pseudonymous/ named participants). See the digest of consent/agreement forms for examples.
12. Researchers must be mindful of their own safety (i.e. physical, legal, reputational, psychological/ emotional) as well as the participant's.<sup>43</sup> Risks here are addressed under a 'lone worker/ study protocol'.<sup>44</sup>
  - a. **Details and contact information** for places visited on the day of each interview should be left with a relative, friend or colleague. In the case of foreign travel, the contact person should have appropriate language skills and knowledge of the local context.
  - b. **Sign in and sign out:** message/ email/ phone your contact to confirm arrival at location and safe departure.
  - c. Under no circumstances should you agree to accompany an interviewee to **any other location**.
  - d. In event of any serious incident, the contact person should contact local police and also the 24-hour University security line (+44 141 330 4444); security will flag the issue to the [Crisis Team](#).
  - e. **UofG health and safety guidance** includes a lone study policy (click [here](#) for access). A Word version of the assessment form given in Appendix 1 of that document is included below. Supervisors should review this material for projects involving fieldwork/ activities involving participants.<sup>45</sup>
  - f. **Interviews in home locations** are particularly problematic. In addition to the obvious risks in terms of personal safety, other apparently more minor issues may need to be considered.<sup>46</sup> Preferably ask the potential participant in advance if there are any factors about the home environment you should be aware of.
13. For staff and PG applications, arrangements (including formal risk assessment) for fieldwork abroad should be in accordance with both the University's [travel safety protocol](#) and current Foreign Office travel advice. This is vitally important for areas where there is significant disturbance or unrest. For fieldwork abroad you should fill in a risk

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<sup>41</sup> For guidance, see Nuffield Council, 'The Ethics of Research Involving Animals' [accessible [here](#)].

<sup>42</sup> On issues relating to robots and AI see David J. Gunkel, *Robot Rights* (Cambridge, MA: MIT Press, 2018).

<sup>43</sup> See Byrne, 'How can I ensure I will be safe when carrying out my research?' (Sage Research Methods) as well as 'Risks to Researchers', in *The Research Ethics Guidebook*. For useful discussions of the potential dangers to researchers and participants, see Martha K. Huggins and Marie-Louise Glebeek, 'Introduction: Similarities among Differences', in *Women Fielding Danger: Negotiating Ethnographic Identities in Field Research*, ed. by Huggins and Glebeek (Plymouth: Rowman and Littlefield, 2009), pp. 1–27 as well as Erin Jessee, 'Managing Danger in Oral Historical Fieldwork', *The Oral History Review*, 44:2 (2017), 322–47 [accessible [here](#)] as well as her earlier study, 'The Limits of Oral History: Ethics and Methodology Amid Highly Politicized Research Settings', *The Oral History Review*, 38:2 (2011), 287–307, [accessible [here](#)].

<sup>44</sup> For the UofG lone worker risk assessment, click [here](#).

<sup>45</sup> UofG Health, Safety and Wellbeing indicate that supervisors are regarded as (legally/ managerially) competent to sign off on a lone study risk assessment, though staff are welcome to contact the department where they need advice/ official support.

<sup>46</sup> For instance, is there a dog in the house? If you are envisaging interviewing in home locations, you should consider your preparedness to manage situations of this kind as well as any related issues (e.g. allergies).

assessment form (click [here](#) for access) and arrange for insurance coverage with the UofG [Insurance Office](#).

14. Where foreign research and fieldwork are involved, you must also have verified whether special researcher permits/ visas of any kind are required (e.g. Brazil, China, Indonesia, Kenya, Mexico, Russia, and Tanzania – among others).
15. Where projects deal with controversial issues, ‘unloved groups’ (e.g. extremist subcultures) or fall into other areas described as ‘dirty research’, matters of safety and confidentiality are absolutely central.<sup>47</sup> As noted above, bear in mind that legislation relating to information regarding extremism, terrorism and other criminal activity, notably the UK Government ‘Prevent Strategy’ has made for a very difficult terrain in terms of confidentiality.<sup>48</sup> That said, current guidance is that – except with regard to **terrorism, money laundering** or (suspected) **child abuse** – under UK law there is no more onus on researchers to report crime/ misuse than there is in daily life. Note, however, that this can be complicated by University regulations, where prescriptions may apply.<sup>49</sup> Any research projects in this area will require particular justification and scrutiny.

### 3.3.2) Re Section C2. Research involving artefacts and archival materials

The ethics of archival research is an area of lively discussion.<sup>50</sup> That said, for the most, materials in public archives should not present significant problems in that they are generally considered to be already in the public domain.

- On that basis, projects dealing with data readily accessible in UK public archives, not sensitive in character and not relating directly to living individuals will not typically require ethical approval (though queries are welcome). However, advice from various quarters indicates that it is safer to confirm any conditions of use -- typically with staff managing the archive -- than to make assumptions.
- Use of private archives, as well as estate papers/ documents can present issues and challenges of various kinds – practical, legal and ethical.

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<sup>47</sup> See Erin Sanders-McDonagh, ‘Conducting “Dirty Research” with Extreme Groups: Understanding Academia as a Dirty Work Site’, *Qualitative Research in Organizations and Management: An International Journal*, 9:3 (2014), 241-53 [accessible [here](#)].

<sup>48</sup> See [here](#) for further UofG information on Prevent duty and strategy, including links to current UK Government documentation.

<sup>49</sup> For instance, from a general perspective, there is no absolute requirement for a researcher to report substance misuse, even with regard to class A or B drugs (supply is a different matter). However, University policy is that all misuse occurring on its premises (i.e. including residences) will be reported to police (click [here](#) for UofG guidance).

<sup>50</sup> See for example, Annamaria Carusi and Marina Jirotko, ‘From Data Archive to Ethical Labyrinth’, *Qualitative Research*, 9:3 (2009), 285-98; Pamela Innes, ‘Ethical Problems in Archival Research: Beyond Accessibility’, *Language & Communication*, 30:3 (2010), 198-203; Sue Middleton, ‘Jane’s Three Letters: Working with Documents and Archives’, in *Handbook of Qualitative Research in Education*, ed. by S. Delamont and A. Jones (Cheltenham: Edward Elgar, 2012), 299-312; Francesca P. L. Moore, ‘Tales from the Archive: Methodological and Ethical Issues in Historical Geography Research’, *Area*, 42:3 (2010), 262-70; Judith Schwarz, ‘The Archivist’s Balancing Act: Helping Researchers While Protecting Individual Privacy’, *Journal of American History*, 79:1 (1992), 179-89; Daniel Taube and Susan Burkhardt, ‘Ethical and Legal Risks Associated with Archival Research’, *Ethics & Behavior*, 7:1 (1997), 59-67.

- The same goes for archives outwith the UK.<sup>51</sup> Particular care and caution pertains to state/national archival materials associated with conflict, surveillance or authoritarian/totalitarian regimes.
- It is not impossible that projects relating to artefacts/ collections may involve work with both participants (e.g. museum curators and other professionals, as well as public users) and material objects. It may be simpler to address any issues relating to the latter aspect in an application than in a separate query.

Where an application is deemed necessary, please address the following points as part of your commentary in this section:

1. How is your research informed by considerations regarding the preservation and respect of the materials studied?
2. Where dealing with materials relating to deceased individuals, be mindful of the interests/potential objections of any living relatives.
3. Have you identified any relevant copyright owners? Have you checked permissions/terms with authors/ creators/ curators/ archivists? Have you secured written permission? Where outputs are envisaged, ensure that all parties understand that your work might be publicly available.
4. Are there any issues of [provenance](#)? Where pertinent, refer to UNESCO guidance on [trafficking](#) of artefacts and cultural property.
5. All basic principles of not doing harm, avoiding incrimination, ensuring fairness, balance and so on still apply.

### 3.3.3) Re Section C3. Data management and research outputs

#### *Data protection protocols and confidentiality*

Your data management plan should specify how project data will be secured and how long will it be retained. Give a detailed account of measures and facilities for storage and retention/ destruction of data (= data management plan).

1. Information must be stored **securely**.
  - a. Use University servers, password-protected laptops and memory keys. Devices must support appropriate levels of data encryption – consult with College of Arts IT Support who can check equipment and provide advice.
  - b. Do not allow copies of data to proliferate.
  - c. If dealing with sensitive materials, particularly limit copies of documents that could serve to identify participants from anonymised or pseudonymised materials. Keep any such identifier records entirely separate from working drafts of dissertations/publication outputs, preferably on UofG storage only.
2. For dissertations, remove/ delete all materials from any personal computers and other non-UofG storage immediately on completion of your project.
3. For anonymised interview/ survey data, here is a suggested outline of procedure:

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<sup>51</sup> See for example Marek Tesar, 'Ethics and Truth in Archival Research', *History of Education*, 44:1 (2015), 101-14.

- a. Retain consent/ agreement forms (scan these as a PDF) and redacted data (e.g. transcripts).
- b. Do not mark identifiers on consent forms: create a separate identifier record document.
- c. Indicate when the identifier record will be destroyed. Once this is done, the data can be deemed to be anonymised on the basis that consent/ agreement forms cannot then serve to identify participants.

### *UK General Data Protection Regulation*

UK General Data Protection Regulation ([GDPR](#)) came into force at the start of 2021, following the UK exit from the EU. UK legislation is in large part convergent with EU GDPR, which came into force on 25 May 2018, superseding the UK [Data Protection Act](#) (1998). UofG guidance ([click](#) for link) and materials in this area are evolving. From a research ethics point of view, one of the key issues here pertains to the distinctions noted between ‘consent’ (in its specific GDPR understanding) and other ‘lawful bases’ for processing data. Prior to the implementation of GDPR, ‘informed consent’ was the standard basis for both participation and data management, whereas our position now is that processing of personal data in the context of UofG research projects that have ethical approval is carried out on the lawful basis of ‘public task’. As noted above and elsewhere, remember that GDPR is concerned solely with data processing/ management – not the conduct of research activities/ fieldwork, for which participants still need to give **informed consent**.

1. Note the [basic principles](#) regarding retention and security. Information pertaining to individuals must be accurate, securely stored and not retained for longer than needed. As noted above, such information is divided between ‘[personal data](#)’ which can serve to identify a natural person (i.e. name, address, email, DOB) and ‘[special category data](#)’.
2. Conditions for the scholarly use and archiving of research data are discussed in detail in articles 156–60.
3. Under GDPR, ‘consent’ is, from the researcher’s perspective, the weakest of the lawful bases, the risk being that it can be withdrawn at any time.<sup>52</sup> Conversely, ‘consent’ provides the strongest protection for the participant, guaranteeing the full range of data subject rights (these being: access, rectification, erasure, restriction, data portability and objection). Since consent can be withdrawn even after material has been published, this cannot be the lawful basis used for research where public domain outputs are envisaged, as this means we are not in a position to ensure that the full range of data subject rights pertain.
4. As regards processing for academic research, we follow UKRI guidance and practice in other UK universities by indicating we rely on **task in the public interest** as the basis for processing the basic personal data provided by participants.<sup>53</sup> For any special categories

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<sup>52</sup> See UofG guidance on [consent](#) for further information.

<sup>53</sup> As UKRI guidance on GDPR indicates: ‘The most likely lawful basis for research in UKRI Institutes and in universities (as public authorities) is “task in the public interest”. Organisations can demonstrate they meet the requirements to use this lawful basis by reference to their legal constitutions, or because they are operating under a relevant statute that specifies research as one of the purposes of the organisation, e.g. for universities: University Charter, Education Reform Act, Universities Scotland Act; for UKRI research institutes: Higher Education and Research Act. Using this lawful basis helps to assure research participants that the organisation

data collected, we will be processing this on the basis that it is **necessary for archiving purposes, scientific or historical research purposes or statistical purposes**. This means the researcher is advancing the claim that the work is legitimately part the institution's public remit of gathering and disseminating information with a view to wider social and cultural benefit.<sup>54</sup> Where participants agree to this basis, then their only data subject rights are to request access to data relating to them or lodge an objection to its storage or use.<sup>55</sup> In this respect, they are making a greater commitment than would apply in the case of 'consent' and accepting that their only recourse will be a more involved, more escalated procedure than simply withdrawing consent. At that point, the question is how likely it is that the Data Controller (=UofG) would argue against the objection.

5. As part of claiming task in the public interest as the basis for your handling of data:
  - a. You (and your supervisor in the case of PGR students) must have undertaken UofG GDPR training.
  - b. You should not use the term 'consent' in relation to any discussion of data processing/ management, as you risk confusing participants. Although any ambiguity in documentation will have hopefully been ironed out in the review process, if a participant can make a reasonable case that documentation or comments from researchers/ assistants led them to believe that data would be processed/ managed on the basis of 'consent', then they may have a claim to the full set of data subject rights.
  - c. You must make clear any potential conflicts of interest in terms of funding sources and research objectives. Undeclared conflict of interest, perceived or actual, could provide grounds for objection.<sup>56</sup> Among the principal issues in Arts and Humanities subjects are politicisation (in various possible disciplines, notably history, cultural studies), along with religious belief or affiliation (notably in the context of theology/ religious studies).
6. Where the research data retained is **anonymous**, UK GDPR states that there is no provision for the exercise of data subject rights.<sup>57</sup> Bear in mind here that the data has to be genuinely anonymised such that there is no reasonable likelihood of individuals being identified through triangulation of details.<sup>58</sup>

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is credible and using their personal data for public good.' (UKRI, 'GDPR and Research: An Overview for Researchers', accessible [here](#)).

<sup>54</sup>See UofG guidance on [processing](#) for further information.

<sup>55</sup> Participants should be advised that objections can be submitted via the Data Protection and Freedom of Information proforma available [here](#).

<sup>56</sup> There have been various prominent instances in medical and scientific research in this regard, notably relating to public health issues such as smoking or vaping, with research projects funded by tobacco companies. Another problematic area is research advancing scepticism about the impact of climate change (for an overview of issues and discussions see [https://en.wikipedia.org/wiki/Climate\\_change\\_denial](https://en.wikipedia.org/wiki/Climate_change_denial)).

<sup>57</sup> 'The principles of data protection should apply to any information concerning an identified or identifiable natural person. [...] The principles of data protection should [...] not apply to anonymous information, namely information which does not relate to an identified or identifiable natural person or to personal data rendered anonymous in such a manner that the data subject is not or no longer identifiable. This Regulation does not therefore concern the processing of such anonymous information, including for statistical or research purposes.' (GDPR, § 26).

<sup>58</sup> In terms of GDPR, where data allows for natural persons to be identified through triangulation and cross-reference, it is deemed to be 'pseudonymous'.

7. As noted earlier, anonymised data retained for research purposes are exempt from provisions regarding protection – subject to satisfactory institutional compliance with relevant protocols. Pseudonymous data are at least potentially not.<sup>59</sup> Note that the understanding of ‘pseudonymous’ data under UK GDPR is broader than simply the replacement of names by pseudonyms and includes data that has not been appropriately and effectively anonymised.
8. The processing of special category personal data is especially problematic and in such cases a Data Protection Impact Assessment must be completed.<sup>60</sup> In such instances, potential applicants are advised to liaise directly with the University’s Data Protection and Freedom of Information office before submitting their ethics application.
9. [Transfer of data between the UK and the EU](#) is covered by ‘adequacy regulations’. See ICO guidance for further information.
10. Not all University data processing is covered by the lawful basis of public task. For instance, processing in relation to course development and marketing falls under the basis of [‘legitimate interests’](#).

#### *Confidentiality/ anonymity*

Interviewees may only be named if their permission has been explicitly sought. This should only be done where a name is essential for the pursuit of the research. Ask yourself:

1. What are the potential **risks** for participants? (e.g. incrimination, exposure to persecution or abuse, triggering of stress reactions/ distress)
2. Can subjects can be **identified** from the information held?<sup>61</sup> Is it possible to use participant evidence to extrapolate/ triangulate the identities of other participants or non-participants?
3. Who will have **access** to the data? Are third parties involved in any particular aspect (e.g. transcription of interview materials; IT development/ support)?
4. What measures will be adopted to maintain the **confidentiality** of research subjects?
5. How will these considerations be reflected in strategies for the **storage and destruction of data** and (for PG and staff applications) dissemination of findings?

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<sup>59</sup> See Regulation (EU) 2016/679 of the European Parliament and of the Council (article 26) in this regard: ‘The principles of data protection should apply to any information concerning an identified or identifiable natural person. Personal data which have undergone pseudonymisation, which could be attributed to a natural person by the use of additional information should be considered to be information on an identifiable natural person. *To determine whether a natural person is identifiable, account should be taken of all the means reasonably likely to be used, such as singling out, either by the controller or by another person to identify the natural person directly or indirectly. To ascertain whether means are reasonably likely to be used to identify the natural person, account should be taken of all objective factors, such as the costs of and the amount of time required for identification, taking into consideration the available technology at the time of the processing and technological developments. The principles of data protection should therefore not apply to anonymous information, namely information which does not relate to an identified or identifiable natural person or to personal data rendered anonymous in such a manner that the data subject is not or no longer identifiable.* This Regulation does not therefore concern the processing of such anonymous information, including for statistical or research purposes.’ (emphasis added).

<sup>60</sup> See UofG guidance on [DPIAs](#) for further information.

<sup>61</sup> Even before discussions relating to GDPR, pseudonym use was noted as potentially problematic in this regard. For instance, it typically follows participant gender and is thereby still minimally identifying of the ‘natural person’. On problems associated with the issue generally, see ‘Pseudonym’ in *The SAGE Encyclopaedia of Qualitative Research Methods*, ed. by Lisa M. Given (2008) [click [here](#) for access].

### *Retention and outputs*

What research outputs (academic publications, public engagement/ knowledge transfer activities) are envisaged? PG dissertations: Will the dissertation itself be available in the public domain (e.g. via GUL) and will publications result?

1. Undergraduate and PGT applications: For UG projects, no public domain outputs will result and all project materials must be destroyed on completion of the dissertation. Indicate accordingly on the consent/ participant information forms. PGT projects may envisage future publication (discuss this with your convener/ supervisor), in which case that must be specified in the application as well as on the consent/agreement and participant information forms. If you do not mention the possibility of publication on the consent/ agreement form, you may not make future use of the material.
2. PGT, PGR and staff applications: be clear about how long data will be retained. The default is that the University archives all dissertations and retained materials for ten years in the first instance (and longer if the material is consulted during this period). This includes completed consent forms.<sup>62</sup>
  - a. For postgraduates, an electronic version of your thesis might be made **publicly available** online by GUL. Your supervisor, programme or School PG convener will be able to confirm details.
  - b. Indicate if it is anticipated that your work will form the basis of a monograph or articles later.
  - c. Remember that under GDPR, participants who have agreed to ‘task in the public interest’ being the lawful basis retain access and objection rights with regard to personal and special category data. In the case of anonymised data, those rights do not obtain. If you intend to anonymise your data, give a clear outline of the process on the consent/ agreement and participant information forms, explaining that once the data has been anonymised, it can be used for research and publication purposes without further reference back to the participant. This means that any participant who wishes to withdraw must do so before the data is anonymised. Give an appropriate and realistic cut-off date.
3. If you move to another institution and continue working on the same materials, you are advised to seek or confirm ethical clearance again there.
4. For medium-scale surveys etc. where data is **pseudonymised**, participants should be asked to give one-off agreement for use and citation of materials in resultant publications (i.e. in keeping with the lawful basis of ‘task in the public interest’ as defined under GDPR). Anything else will be too complex for you to police effectively.
5. In smaller surveys/ semi-structured interviews involving professional/ ‘elite’ participants (curators), or creative practitioners, these parties may choose to be **named**.<sup>63</sup> Explicit agreement should be sought for named use of data. Named participants should have the right to request to see interview transcripts and should be provided with pre-submission drafts of any publications. In the unfortunate event that serious disagreement arises or there is some other irresolvable breakdown in relations between researcher and

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<sup>62</sup> N.B. Identifiers/ pseudonyms must not be recorded on consent forms.

<sup>63</sup> This can be for reasons of consolidating academic engagement/ public profile or asserting intellectual property with regard to practice. In such cases the research can benefit participants.

participant, GDPR provision on the basis of ‘task in the public interest’ will provide some leverage. Any such instances should be flagged up to the College Ethics Officer.

6. *Legacy datasets* (staff applications only): While UK GDPR focuses attention on the time-limited retention of data, conversely it also makes provision (Articles 156–60) for the archiving of material, where appropriate, for future use in the form of what are referred to in the UK as ‘legacy datasets’. Are the materials intended to be retained for future use as part of a legacy dataset or would there be merit in including this possibility?
  - a. Explicit permission must be/ have been sought as part of the project. If it was specified in participant information or consent/agreement materials that data would be destroyed, this cannot be altered retrospectively.
  - b. Datasets in this case are typically large scale and associated with major collective projects. In Arts, examples are community/ oral history projects or other archives of potential future interest and significance.

#### **3.3.4) Re Section C4: supervisor confirmation and comments**

Supervisors: please note that by approving this application you confirm that:

1. The student is appropriately informed with regard to the College’s Ethics Policy and Procedures.
2. The topic merits further research.
3. The student has the relevant skills to begin research.
4. If interviewing, the student has produced an appropriate plain language information sheet for participants.
5. The procedures for recruitment and obtaining informed consent/agreement are appropriate.

As part of your comments, please include details regarding the following issues:

1. What feedback you provided during the application process.
2. What training the applicant has received/ undertaken.
3. How research conduct is to be monitored.
4. What publication and other public domain outputs are likely to result.
5. Please comment on the quality of accompanying materials, including use of plain language / arrangements regarding translation.

#### **3.3.5) Funding applications**

If there are any funder requirements relating to ethical matters, please include note of them in this section. Similarly, if the UofG application is a consequence of funder requirements, please indicate accordingly, citing relevant documentation.

#### **3.3.6) Submission to other colleges or institutions**

Normally speaking, an application should only be submitted to one College. However, although rare, it is not impossible that cross-College interdisciplinary partnerships or initiatives (e.g. in the field of Medical Humanities) might require review elsewhere. Inter-institutional projects and supervision will likewise require review and clearance from both institutions. Projects with any clinical dimension must also have NHS ethical clearance.

### **3.4) Monitoring and end of project report (Section D)**

The end of project report should provide a note of any issues that arose in the course of the project (these will presumably be minor/ routine in character as any serious issues, notably data breaches, should be flagged up immediately), along with a record of any discussion with the Ethics Officer subsequent to approval. For the time being, reports should be submitted to the [arts-ethics@glasgow.ac.uk](mailto:arts-ethics@glasgow.ac.uk) though this function is due to be incorporated as a function into the online system.

#### 4) ADDITIONAL APPLICATION MATERIALS

##### 4.1) Participant information sheet/ plain language statement

Sample Participant Information materials are available from the Research Ethics Moodle.

1. The language of the sheet should be appropriate to the sample group. Pay particular attention where minors/ children are involved (see the relevant samples/ template sheets in the consent/ agreement form digest).
2. Encourage participants to rehearse the possibility of saying 'no' with regard to any aspect.
3. It is recommended that the information sheet is separate from the Consent Form as then the participant is able to take the explanatory material away and reflect on it.
4. For online surveys, participant information can be included in the survey call and should be available before clicking on the link for the survey itself.
5. Where translations of the materials will be required, submit versions in English and detail arrangements for translation and checking/ certification.

##### 4.2) Consent/ agreement forms

Sample template forms are available as part of the Arts documentation.

1. Templates will need to be tailored according to the nature and level of the project.
2. The lawful basis of the research must be clearly presented. As noted above, the ramifications of task in the public interest should be distinguished from the informed consent required for participation in fieldwork activities.
3. Explain clearly details on confidentiality/ security, retention of data and outputs. What will happen with the data and when? This can actually be helpful in terms of foregrounding any issues in the research management process.
4. Indicate that the applicant has the right to refuse to answer any questions and to withdraw without giving a reason (up until data has been anonymised). If this happens, all materials relating to that applicant will be destroyed immediately.
5. Offer appropriate explanations and options, reflecting the **kinds of participants** involved (named/ anonymous/ pseudonymous). Named participants must opt in.
6. If the project consists of various phases (e.g. group/ community workshops leading to the creation of a drama project and subsequent performances), it is advisable to include opt-in stages on the form, in particular a final confirmation.
7. If the research consists of various parts using different sample groups, separate information and consent forms will be needed for each group. Do not try to create a one-size-fits-all version: this will most likely confuse participants.

##### 4.3) Draft Questionnaires/ Sample Interview Questions

1. The larger the sample, the more structured the questioning.
2. For student applications, interview questions must be agreed with and approved by the supervisor.
3. For online surveys, this should include a finalised version of the survey questions. Student applicants should not vary these without consulting with their supervisor.
4. As per the other materials, the language should be appropriate for the participants. This will require particular consideration with regard to children and minors. You need to ensure that the formulations you arrive at will get you the data you need.

**4.4) Privacy notice**

See Data Protection and Freedom of Information Office (DPFOI) for guidance. This statement can be incorporated into the consent form. Guidance can be found at <https://www.gla.ac.uk/myglasgow/dpfoioffice/gdpr/privacy%20notices/#d.en.586865>

**4.5) Data protection impact assessment (DPIA)**

This is mainly for larger research projects. See DPFOI for guidance. Also <https://www.gla.ac.uk/myglasgow/dpfoioffice/gdpr/dpia/>.

## 5) REVIEW PROCESS AND APPLICATION OUTCOMES

### 5.1) What the reviewers are looking for...

Below is the standard feedback proforma indicating key aspects reviewers are asked to consider. Reviewers are not required to use the form itself for their feedback on all applications (notably where extensive comment is not needed).

1) <i>Application Number</i>	
2) <i>Applicant Name</i>	
3) <i>Name of Reviewer</i>	
4) <i>Checklist</i>	
<ul style="list-style-type: none"> <li>Are all potential issues identified in the checklist? If not, please comment below.</li> </ul>	
5) <i>Risks and Mitigation</i>	
<ul style="list-style-type: none"> <li>Is the commentary in Section C regarding risks and mitigation sufficient in coverage and quality? (N.B. feel free to treat all this question as 'open' – i.e. 'To what extent is the commentary...')</li> <li>Are all checklist issues addressed?</li> <li>Are there any issues of researcher/ participant safety requiring further attention/ consideration?</li> </ul>	
6) <i>Data Management/ Retention</i>	
<ul style="list-style-type: none"> <li>Please give a note of any concerns.</li> </ul>	
7) <i>Supervisor Statement (for student applications)</i>	
<ul style="list-style-type: none"> <li>Please give a note of any concerns.</li> </ul>	
8) <i>Accompanying Materials</i>	
<ul style="list-style-type: none"> <li>Are/ to what extent are the participant information and consent/ agreement forms appropriate to the project?</li> <li>Please comment on any issues of presentation and written expression (particularly re plain language).</li> </ul>	
9) <i>Any Additional Comments</i>	
<ul style="list-style-type: none"> <li>Record your overall decision via the system. Please indicate here if the application seems borderline between categories (e.g. recommended as major changes but with aspects indicating rejection would be appropriate).</li> </ul>	

## 5.2) Reviewer criteria

Outcome	Gloss
Approval	Barring the odd spelling mistake, the application and related materials are satisfactory as they stand. All pertinent issues have been considered in a joined-up fashion (Section A checklist <-> Section C <-> accompanying materials). No harm should arise from the project being conducted as framed.
Minor changes	The application and materials are generally adequate in terms of their identification, assessment and proposed handling of ethical issues and risks, but there are minor inconsistencies or points not considered (e.g. interviewer safety protocols). The revised materials will be checked by the lead reviewer (usually the Ethics Officer or deputy) only.
Major changes	The project is potentially viable but there are significant problems relating to the identification, assessment and proposed handling of ethical issues and risks. Significant reworking of survey/ consent/ agreement materials and/or overall conceptualisation/ design may well be required. The revised application will be recirculated to ALL original reviewers. <sup>64</sup>
Rejection	The application is not adequate and/or the project as formulated carries a <b>high</b> risk of significant harm to subjects and/or investigator. If PG/UG, then the supervisor needs to review their understanding of ethical issues, guidance practices and/or devote considerably greater scrutiny in future.

## 5.3) Resubmission guidance

1. Review the feedback and guidance provided in the letter.
2. UG and PG students: consult with your supervisor where advised, particularly where major changes are required.
3. Check/ proofread all materials very carefully before resubmission. Make sure you have followed all guidance on presentation.

## 5.4) After approval

What to do after you are given approval:

1. It is your responsibility to **inform your supervisor/** advisor/ funding body of the outcome of your application.
2. You must **indicate ethical clearance on all consent and interview information forms**, plus acknowledgements page of dissertation (e.g. 'ethical clearance for this project has been granted by the College of Arts Research Ethics committee [date of approval letter]').
3. Make it clear to participants that there will be **no impact** if they choose either not to participate in the interviews or to allow use of the resulting materials. Otherwise they

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<sup>64</sup> For applications involving significant potential risk or sensitive issues, it is not uncommon for even very well formulated applications to be referred back as requiring major changes. This is quite often reflective of the level of scrutiny appropriate to the nature of the project rather than of notable/ worrying deficiency in the application materials.

may feel/ object they have been coerced into taking part. This is also why it is essential to retain consent forms.

4. You must take appropriate and timely steps with regard to all personal data breaches. Follow the advice and procedures on the DPF0I website in this regard.<sup>65</sup>
5. A brief **end of project report** must be provided within one month of completion. Please provide a breakdown of numbers of participants who consented to take part – as well as indicating how many participants if any decided to withdraw from the project. Detail any ethical issues which have arisen as well as arrangements for handling of data (storage and destruction). A paragraph or two will usually be sufficient. For UG/PGT dissertations, this can be included in any reflective comment/ appendix required by the department.

## 6) BREACHES AND MISCONDUCT

The basic parameters for proper conduct are as follows:

1. Research must not be conducted without appropriate ethical clearance. No data collected without clearance may be used in later research. Please note that only very exceptionally can approval for research be given retroactively. Staff not yet under contract or students not formally enrolled must not engage in fieldwork.
2. Participants and researchers should not be subjected to harm or unnecessary risk.
3. Data must not be misused.
4. Data breaches must be dealt with in timely fashion and in accordance with University procedures (click [here](#) for guidelines).

Where practice fails to comply with these principles, an investigation may be necessary. Note that the Ethics Officer does not deal with potential disciplinary issues. Instead, such instances are referred to Senate Office (in the case of UG and PGT projects – click [here](#) for guidance) or to the relevant School Research Integrity (RI) Advisor in the case of staff and PGR matters (click [here](#) for further information).

Please note that where an issue is referred to an RI advisor, this does not constitute a formal disciplinary procedure in and of itself. Likewise, RI procedures are informal in the first instance. Except in cases of serious malpractice, outcomes are typically 'advisory', with relevant guidance and procedures being (re-)emphasised.

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<sup>65</sup> See <https://www.gla.ac.uk/myglasgow/dpfoioffice/gdpr/personaldatabreaches/> for flowchart.

## 7) REFERENCES AND RESOURCES

- Association of Social Anthropologists of the UK, 'Ethical Guidelines for Good Research Practice' (2011) [Obviously not that recent, but still very helpful in terms of the ethical considerations pertaining to research methods. Accessible at: <https://www.theasa.org/downloads/ASA%20ethics%20guidelines%202011.pdf>]
- Ali, Suki and Moira Kelly, 'Ethics and Social Research', in *Researching Society and Culture*, ed. by Clive Seale, 4th edn (Oxford: Sage, 2017), pp. 43-60
- Boddy, Janet and others, *The Research Ethics Guidebook* (Institute of Education, University of London) [An older online resource accessible in a 2012 archived version at <http://www.ethicsguidebook.ac.uk/>, though still useful for advice with regard to research design and dealing with participants.]
- Byrne, David, 'Research Ethics', in *Sage Research Methods* (Sage, 2016) [This is actually not a book per se but a section -- comprising downloadable PDFs with detailed advice -- in a larger project planning platform. Accessible via GUL.]
- Carusi, Annamaria and Marina Jirotko, 'From Data Archive to Ethical Labyrinth', *Qualitative Research*, 9:3 (2009), 285-98
- Dobrick, Farina Madita, Jana Fischer and Lutz M. Hagen (eds), *Research Ethics in the Digital Age: Ethics for the Social Sciences and Humanities in Times of Mediatization and Digitization* (Wiesbaden: Springer, 2018) [A very useful collection of essays dealing with various pertinent issues and contexts. Accessible via GUL as an ebook.]
- ESRC, Research Ethics materials [accessible at <https://esrc.ukri.org/funding/guidance-for-applicants/research-ethics/>]
- European Union, General Data Protection Regulation [accessible at <https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1528874672298&uri=CELEX%3A32016R0679>]
- 'Get Your Facts Right: A Guide to Involving Young People in Social Science Research' [accessible at <https://www.glasgow.gov.uk/CHttpHandler.ashx?id=31601&p=0>]
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- Information Commissioner's Office (ICO), 'Guide to the UK General Data Regulation (GDPR)' [accessible at <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/>]
- Innes, Pamela, 'Ethical Problems in Archival Research: Beyond Accessibility', *Language & Communication*, 30:3 (2010), 198-203
- Iphofen, Ron and Martin Tollch, *The SAGE Handbook of Qualitative Research Ethics* (London and Thousand Oaks: Sage, 2018) [Hefty and thoughtful guidebook. Accessible via GUL as an ebook.]
- Israel, Mark and Ian Hay, *Research Ethics for Social Scientists: Between Ethical Conduct and Regulatory Compliance* (London and Thousand Oaks: Sage 2008)
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- --- 'Managing Danger in Oral Historical Fieldwork', *The Oral History Review*, 44:2 (2017), 322-47 [accessible at: <https://doi.org/10.1093/ohr/ohx038>]

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- Moore, Francesca P. L., 'Tales from the Archive: Methodological and Ethical Issues in Historical Geography Research', *Area*, 42:3 (2010), 262-70
- National Coordinating Centre for Public Engagement guidance [accessible at <https://www.publicengagement.ac.uk/> ]
- Nuffield Council, 'The Ethics of Research Involving Animals' <http://nuffieldbioethics.org/wp-content/uploads/The-ethics-of-research-involving-animals-full-report.pdf>
- Oliver, Paul, *The Student's Guide to Research Ethics*, Open UP Study Skills, rev. edn (Open University Press, 2010) [Pre-GDPR, but still a very useful and thoughtful consideration of ethical issues in research. Accessible via GUL as an ebook.]
- Oral History Society, 'Is your oral history ethical and legal?' [accessible at <https://www.ohs.org.uk/advice/ethical-and-legal/> ]
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- Sanders-McDonagh, Erin, 'Conducting "Dirty Research" with Extreme Groups: Understanding Academia as a Dirty Work Site', *Qualitative Research in Organizations and Management: An International Journal*, 9:3 (2014), 241-53 [accessible at <http://dx.doi.org/10.1108/QROM-01-2013-1131> ]
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- —, 'GDPR and Research: An Overview for Researchers' [accessible at: <https://www.ukri.org/files/about/policy/ukri-gdpr-faqs-pdf/>]
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- Universities UK, 'The Concordat to Support Research Integrity' [accessible at <https://www.universitiesuk.ac.uk/policy-and-analysis/reports/Documents/2012/the-concordat-to-support-research-integrity.pdf> – see also the UK Research Integrity Office page on the Concordat and its revision at <https://ukrio.org/our-work/the-concordat-to-support-research-integrity/>]

For non-clinical research relating to human participants, a wealth of documentation and guidelines can be accessed via the ESRC's '[Useful Resources](#)' page.

### Lone Study Activity Risk Assessment Form

<b>Description of study activity:</b>	<b>No. of students exposed:</b>

<b>College/ University Services:</b>	<b>School/ RI/ Service:</b>

<b>Risk assessment carried out by:</b>	<b>Date completed:</b>	<b>Review date:</b>
<b>Assessor's signature:</b>		

<b>Main risk and issues of concern</b>	<b>Domiciliary Visits</b>	<b>Working Alone in Buildings</b>	<b>Travel Between Sites</b>	<b>Remote Field Work</b>
Are lone students involved in the activity?	Yes/ No	Yes/ No	Yes/ No	Yes/ No
Do students carry out visits/travel to high-risk locations (for example, areas with high crime rates)?	Yes/ No	Yes/ No	Yes/ No	Yes/ No
Do students carry out visits during unsociable hours or out with normal office hours?	Yes/ No	Yes/ No	Yes/ No	Yes/ No
Is there a security provision?	Yes/ No	Yes/ No	Yes/ No	Yes/ No
Does any student have medical problems that may put them at a higher risk of becoming unwell when working alone?	Yes/ No	Yes/ No	Yes/ No	Yes/ No
Is First Aid available if the student becomes ill or injured?	Yes/ No	Yes/ No	Yes/ No	Yes/ No
Do student activities involve handling dangerous substances (Chemicals, Bio-Hazards)?	Yes/ No	Yes/ No	Yes/ No	Yes/ No
Can all the equipment required for the activity, be carried safely by one person?	Yes/ No	Yes/ No	Yes/ No	Yes/ No
Do students carry valuable materials or equipment?	Yes/ No	Yes/ No	Yes/ No	Yes/ No
Once on site do students work in isolation?	Yes/ No	Yes/ No	Yes/ No	Yes/ No
When on university property, does the activity involve working in different areas around the university alone? Is there poor access/bad lighting to the building?	Yes/ No	Yes/ No	Yes/ No	Yes/ No
Do students carry out visits or meet with members of the public in isolated areas?	Yes/ No	Yes/ No	Yes/ No	Yes/ No
Do students visit unfamiliar members of the public?	Yes/ No	Yes/ No	Yes/ No	Yes/ No



Does the activity involve visits to high-risk or unstable or unpredictable individuals?	Yes/ No	Yes/ No	Yes/ No	Yes/ No
Are first year students involved in visits to domestic premises?	Yes/ No	Yes/ No	Yes/ No	Yes/ No
Do students visit multiple sites on same journey	Yes/ No	Yes/ No	Yes/ No	Yes/ No
Do supervisors know where students are going? (e.g. Do students decide the order and when to do visits)	Yes/ No	Yes/ No	Yes/ No	Yes/ No
Others (Please give details below):				

Existing control measures – Tick if these are in place and give details below			
Do you provide accompanied visits when there are concerns about safety?		Have you issued personal attack alarms?	
Are there systems for monitoring students whereabouts and movements and for regularly reporting to base? (Please attach details)		Do you use two-way radios/mobiles or other communication systems?	
Do you provide joint working for high-risk activities?		Do students have information and training on basic personal safety?	
Is there closed-circuit television within or around the building?		Are students trained, where appropriate, in strategies to prevent and/or de-escalate potentially confrontational or aggressive situations	
Are entrance security systems in use (for example, coded door locks or swipe cards)?		Do students have access to report incidents or near misses and appreciate the need for this procedure?	
Is there security lighting around access points and parking areas?		Do students know procedures in event of University vehicle breakdowns?	
In University buildings where students could be working alone, are there panic buttons linked to manned locations?		Is there a procedure in place if students fail to turn up at a site or return from a site visit?	
If moving and lifting equipment, has a moving and handling risk assessment been undertaken and have students received moving and handling training?		Do you have safe operating plans and training highlighting the risks?	
Does the department have a Booking IN/OUT system for off site visits?		Do students have the ability to contact base if stranded?	



Details of Control Measures identified above

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Risk(s) remaining after existing control measures are in place:

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**N.B. This is a Generic Risk assessment and during the course of work additional hazards may occur specific to the job or condition of the employee that will warrant a person specific risk assessment.**

Additional controls required:

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Timetable for implementation of additional control(s)

--

Name:

Signature:

Designation:

Date:

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