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Ethics Are Admin: Australian Human Research Ethics Review Forms as (Un)Ethical Actors

Andrew M. Whelan
University of Wollongong, awhelan@uow.edu.au

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Abstract

In Australian universities, social research projects secure institutional approval as ethical through research ethics committees, and are defined and communicated to these committees through standardized local application forms. In organizational terms, ethics are instituted first as an administrative ritual anterior to research, and routinely elided as such. The documentation constituting this ritual thus bears scrutiny, in terms of what it says and what it does, and in turn, what it requires applicants to say and do. Such scrutiny is a means of fleshing out the standard critique of prospective ethics review from social media researchers: that the opportunity for a proper conversation about research ethics in the community of researchers is supplanted by an administrative exercise in "box ticking." This paper discusses these ethics application forms, attending specifically to the ethical consequences of the stance they require the applicant to take with respect to prospective research participants, and the implications of their formulation of research as a process of data extraction.

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Keywords

administrative forms, ethics review, institutional review boards, research administration, research ethics

Introduction

In Australian universities, the status of being ethical is assigned to research, first and formally, in advance: to a research project design, in the shape of approval of an appropriately filled out form. This article consists of an engagement with these forms, and the master document they index. These documents are shown to have implications for research ethics as a social practice to be described via the forms, and for how research itself is to be understood and evaluated as a form of knowledge production.

The following is thus based on a review of procedural ethics documentation from 10 Australian universities: Curtin, Deakin, Griffith, Macquarie, QUT, RMIT, University of Wollongong (the employer of this author), University of Tasmania, University of Technology Sydney and Western Sydney University. The ethics policies and procedures at the listed universities are representative of those in place at all Australian universities. Australian ethics review is not radically dissimilar to that conducted in Canada, the United Kingdom, or the United States, though the Australian context has not been as thoroughly addressed (but see Macintyre, 2014; Mooney-Somers & Olsen, 2017; Thomson, Breen, & Chalmers, 2016). Readers unfamiliar with the Australian

system may find it instructive to consider how the particularities of national context are exhibited in the Australian forms, and how Australian ethics processes may differ from those found in the reader's own context.

There is a robust critical literature addressing regulatory ethics oversight from qualitative social researchers (e.g., Gross, 2012; Guta, Nixon, & Wilson, 2013; Halse & Honey, 2007; Hammersley, 2010; Lincoln, 2005; Macintyre, 2014). There is also a strong critique of administrative ethics from digital social researchers and researchers interested in social media, for whom administrative ethics procedures throw up specific challenges (see, for example, Buchanan & Ess, 2009; Ess, 2002; Markham & Buchanan, 2015; Thomas, 2004; Zimmer, 2010).

In the established critiques, ethics review is not commonly explored with reference to research on administrative documents, such as that emanating from anthropology of

University of Wollongong, Australia

Corresponding Author:
Andrew Whelan, University of Wollongong, Wollongong, NSW 2522, Australia.
Email: awhelan@uow.edu.au

bureaucracy (Hull, 2012; Lowenkron & Ferreira, 2014), or work in the ethnomethodological tradition (Kameo & Whalen, 2015; Turner, 2014). These latter bodies of work are productive here in that they direct attention directly to documents as material artifacts which organize people and practices around them. From this perspective, a central question is: "What does a given suite of documents do and require and enable people to do?"

In institutional terms, ethics are not already there as a feature of social interaction and exchange (such as research): they are already there as a compulsory administrative procedure instituted anterior to research taking place, and routinely elided as such. Unpacking the ethical ramifications of this achievement is a way of fleshing out the established critiques of prospective ethics review, where the opportunity for a meaningful conversation about ethics is supplanted by an exercise in "box ticking" (see, for example, Katz, 2006; Schrag, 2011).

Ethics forms play a central role in establishing what research actually is, and they also require those who fill them out to show and say they see the world in a particular way and not in other ways—to profess particular stances. This is nominally merely assenting to practice a formalist, precautionary ethics in an immanent elsewhere. However, if we stop limiting ethics to research practice exclusively, bracketing them from organizational practices with apparently different ethical ontologies, we can see that the expectations and requirements of the form have ethical implications. The form is an ethical actor. Ethics forms and the family of documents they represent and index are key institutional nodal points in the production of research and researchers. These forms mediate persons, practices, organizations, discourses, temporalities and horizons of possibility, apportioning entitlements and obligations, and enjoining future actions.

Ethics committees do crucial, thankless work, conducted in and through documents, and as Laura Stark's (2011) book title has it, *Behind Closed Doors*. The critique of administrative ethics can be enhanced through substantive engagement with these documents, and with ethics review as a mundane practical activity involving filling in and circulating forms (see also Burris & Welsh, 2007; Dixon-Woods, Angell, Ashcroft, & Bryman, 2007 attending to correspondence sent by ethics committees).

In the following section, I begin with an overview of the *National Statement on Ethical Conduct in Human Research* (National Health and Medical Research Council [NHMRC], 2007). This is the "boss text," the document at the apex of the institutional circuit (Smith & Turner, 2014, p. 10). Following this, I trace how the framing of research ethics in this document is actualized in local ethics forms, attending particularly to how the forms frame management of sensitivities imputed to prospective research participants, and the ethical implications of this framing for the person aiming to fill the form out successfully. Given that the consent form ultimately extends into the actual research encounter from the ethics

oversight process, and is invariably required and in all instances anticipated by the ethics application form, I then turn to the institutional function of consent as the means of producing commensurable data: ethics clearance as the datafication of research.

The *National Statement*

Australian university Human Research Ethics Committees (henceforth: HRECs) administer local ethics protocols and procedures in accordance with the *National Statement* (NHMRC, 2007, pp. 68-73). This document defines ethical research in Australia through what Halse (2011) calls "principlism." The core principles that undergird ethical research, according to the *Statement*, are research merit and integrity, justice and beneficence, and respect for human beings. These are phrased, respectively, as follows.

Research with merit and integrity should be

"justifiable by its potential benefit, which may include its contribution to knowledge and understanding, to improved social welfare and individual wellbeing, and to the skill and expertise of researchers . . . designed or developed using methods appropriate for achieving the aims of the proposal," and "conducted or supervised by persons or teams with experience, qualifications and competence that are appropriate for the research." (NHMRC, 2007, p. 10)

Such research must add something productive to the stock of knowledge, but also do this while (or as at least a partial consequence of) adhering to appropriate methods and being conducted by appropriate persons.

Research that is just is fair:

the selection, exclusion and inclusion of categories of research participants is fair . . . the process of recruiting participants is fair . . . there is no unfair burden of participation in research on particular groups . . . there is fair distribution of the benefits of participation in research . . . and there is fair access to the benefits of research. (NHMRC, 2007, p. 10)

Where research is beneficent, the "likely benefit of the research must justify any risks of harm or discomfort to participants. The likely benefit may be to the participants, to the wider community, or to both," and the research has been designed "to minimise the risks of harm or discomfort to participants," and to clarify "for participants the potential benefits and risks of the research" (NHMRC, 2007, pp. 10-11).

Finally, having respect for human beings "requires having due regard for the welfare, beliefs, perceptions, customs and cultural heritage, both individual and collective, of those involved in research," respecting "the privacy, confidentiality and cultural sensitivities of the participants and, where relevant, of their communities." Respect for human beings also "involves giving due scope, throughout the research process, to the capacity of human beings to make their own decisions

. . . empowering them where possible and providing for their protection as necessary" (NHMRC, 2007, p. 11).

The emphasis in the *Statement* is on minimizing possible negative effects of the asymmetric relation between researcher and researched for the latter party, irrespective of the broader social context in which these persons are situated. The research participant is figured as "vulnerable," and several categories of persons are predicated as such in the document (including Aboriginal people, pregnant women and fetuses, and people dependent on medical care). The practical pertinence of this vulnerability (and all that ethical research aims to avoid with respect to it) is that it is a vulnerability to exploitation by unscrupulous researchers. In accord with the medical paradigm from which the *Statement* originates, risk of "harm" is imagined in a rather immediate, individualized way (something that may happen to the person signing the consent form). The possibility of research critical of elites or of people with unpalatable political perspectives does not seem to be envisioned. "Due regard" for the beliefs and customs of participants is required for research to be ethical, and in the *Statement* (and many instances of the form) an expectation is expressed that "Research outcomes should be made accessible to research participants" (NHMRC, 2007, p. 10).

These principles (merit, justice, and respect), so defined, are both "thin" (perhaps thankfully, in the eyes of some researchers), and contestable. For example, why (only) these particular principles? Who gets to say what is just or what is a fair distribution of the benefits and costs of a particular research project? Whatever other questions one might raise, researchers seeking institutional approval are under an obligation to ensure (or at least to formulate statements indicating) that their practices adhere to them.

A more pertinent practical issue than the contestability of the principles is how to operationalize them to ensure compliance. The *Statement* provides for this by transmuting the "ends," or the values underlying the principles, into "means." There are two means, referred to as "themes" in the document: proper risk assessment (NHMRC, 2007, pp. 12-15), and consent (pp. 16-18).

An important epistemological feature of how ethical research is conceptualized is indicated by the emphasis on risk assessment and management. It is not just that a given project, to be ethical, must exhibit a level of reflexive knowledge about itself. A specific instrumentality in how that knowledge is formulated and expressed, and around why it ought to be cultivated, is also required.

Ethical research, the *Statement* implies, is aware of, and consequently able to inform participants about, the risks and benefits of participation. Irrespective of the topic being investigated and the state of knowledge on it, ethical research can therefore exhibit in its design something that is already known: what the (present and future) risks and benefits of that research are to prospective participants. Yet, this can never be known with certainty in advance (Markham & Buchanan, 2015).

On receiving information on risks and benefits, participants are in a position to freely consent (or not). Through attending to these themes (risk and consent), the principles of ethical research (research merit and integrity, justice, beneficence, and respect) are enacted: ethical research follows.

Cynical readers may suspect that the *Statement* establishes a procedural alibi, abnegating (or even impeding) the processual ethical dynamic characteristic of actual research encounters. The temptation is to ponder the implications of a rationalist, prophylactic "view from nowhere," grounded by faith in the calculability of risk, and confidence in a calculative, autonomous, and primarily self-interested individual, freely electing to participate once fully apprised of the cost/benefit analysis of doing so. Such pondering, though, is still at one remove from the immediate ethical consequences of how "ethical research" is rendered, at the point where the form is actually filled out, before research takes place.

An important feature of ethical research as imagined in the *Statement* and related documents, is that it is evidenced and administered in this way, via documentation, and that by inference the documents so circulated demonstrate and have appropriate oversight: an institutionally supported and approved hierarchical range of persons tasked with the management, review, and storage of these documents. Ethical research is expressed as a culture, essentially, of documentation. Discrete practices occurring at different times and places are coordinated and assured through the circulation of documents. Documentation and proper processes of documentation oversee, safeguard and guarantee ethical research behavior. These documents are the material delegates, the organizational sanction and memory of ethical research practice.

The *Statement* is a document detailing what ethical research is, which points procedurally forward at two other documents as its lieutenants. Risk assessment and consent are operationalized—one might say, entextualized—by these two documents. Risk assessment is overseen through an application submitted to the HREC prior to commencement of research (where a project so approved will also require reporting on its conduct and progress). This application utilizes a standardized template, designed to ensure the proposed project complies with the *Statement*. Approval of that application will entail a consent procedure, almost inevitably involving a consent form (for which standard templates abound), which research participants will be required to sign.

The NHMRC has a standardized online template for HREC applications, the National Ethics Application Framework (NEAF). At the time of writing, the NEAF is being replaced by a new system, the Human Research Ethics Application (HREA). In both instances, users set up an account, complete the form, and submit it to the relevant HREC or HRECs. The NEAF and the HREA are dynamic forms: the appearance of certain questions depends on previous answers given. The template is usually required for multi-site applications (applications for research conducted at one or more universities and/or another institution, such as a hospital), and at some

universities it is required for "high risk" research: as per the *Statement*, research which may lead to physical, psychological, social, economic or legal harm (NHMRC, 2007, p. 13). Only one of the sample universities uses it for all applications. Most use their own forms, modeled on the NEAF. These are usually available from university websites, although in a few instances an institutional login is required.[1]

'Doing Ethics': Scripting Ethical Handling of Research Participants' Concerns

It is to these local forms that we now direct attention. The local media ecology where they can be encountered is indicative of how they are intended to be approached: the support offered (as per the HREA website and several university websites) is largely oriented to filling them out as efficiently and quickly as possible. There is guidance on forgotten passwords, the functions of the numerous icons in the HREA, and tips on naïvely true answers which will trigger further, impossible questions (e.g., if your study will exclude cognitively impaired persons, don't answer "yes" to that question, because the form will then ask you how you will access people's medical records to demonstrate this).

The forms consist of batteries of questions, many in checklist form. In every instance, there are questions addressing: the "merit" of the project, its "scientificity" (asking for details concerning whether the project has been peer reviewed, and what kind of quantitative or qualitative analysis will be conducted); what outcomes are anticipated; who will conduct the research and their roles, qualifications and expertise; whether there is conflict of interest for the researchers; how consent will be handled; whether participants will be reimbursed; what kinds of procedures the research involves; what kinds of benefits and risks are involved for participants, how risks will be managed and mitigated (including in some instances risks to researchers, and risks to the University); what kinds of persons will be recruited and how (in one instance: "the projected number, sex and age range of participants [including inclusion and exclusion criteria]"); whether "hot" persons (particularly, people unable to give consent due to impairment or disability, people dependent on medical care, pregnant women and fetuses, minors, and Aboriginal and Torres Straight Islander people, who in some iterations of the form are given a distinct check box from the one marked "Human participants") or topics (suicide, mental illness, drug abuse, grief and death, termination of pregnancy and so on) will be involved; and how the data will be handled (stored, and whether identifiable, re-identifiable, or non-identifiable).

In terms of how "research" is formally characterized and established as an approved activity—the shape research is required to take to conform to the logic of practice the forms demand—two core accomplishments of the forms are described in the pages below. The first is the moral orientation toward research participants, which the forms obligate the user to profess (the ethics of the ethics, so to speak). This has been noted by others critically analyzing ethics review processes in other countries, albeit without emphasis on the forms themselves (Lincoln, 2005; Thomas, 2004). The second (which the form instantiates, and enacts) is a primary definition of research as the "collection" of data, indicative of the role played by the form in larger institutional processes.

The forms are designed with these accomplishments in mind, and this becomes clear in attending to some of the questioning across iterations of the form. The application documents often mobilize hierarchies of persons, as in this list:

Mark the categories relevant to this proposal.

Healthy members of the community

University students

Employees of a specific company/organisation

Members of a specific community group, club or association

Clients of a service provider

Health Service clients (e.g. users/clients of a health service)

School children

Hospital in-patients

Clinical clients (e.g. patients)

Aboriginal/Torres Strait Islander people

Members of socially disadvantaged groups

Cadavers/ cadaveric organs

Other (please specify): ___

This list starts from a center of "normal," and proceeds through Dantean circles of institutional and social mortification. Ostensibly a reverse ranking of research "vulnerability," the list is a descent into structural inequality. The closer one gets to the bottom of the list (the more marked the social category), the more evidence required that institutionally sanctioned gatekeepers support the project.

In a similar instance:

Does the research specifically target participants from any of the following groups?

1. Members of a socially identifiable group with special cultural or religious needs or political vulnerabilities

2.　　People able to be identified in any final report when specific consent for this has not been given

3.　　People highly dependent on medical care

4.　　People in a workplace setting with the potential for coercion or problems of confidentiality (e.g. employer/employee)

5.　　People in a dependent or unequal relationship with the researchers (e.g. lecturer/student, doctor/patient, teacher/pupil, professional/client)

6.　　People not usually considered vulnerable but would be thought so in the context of the project

7.　　People unable to give free informed consent because of difficulties in understanding the Plain Language Statement or Information Sheet (e.g. language difficulties)

8.　　People whose ability to give consent is impaired

9.　　People with a physical disability or vulnerability

10.　　People with existing relationships with the researcher (e.g. relative, friend, co-worker)

11.　　Residents of a custodial institution

12.　　Aboriginal and Torres Strait Islanders, communities or groups

Here, the groups exhibit a diversity of range: groups 2, 5, 6, 10 and arguably 7 and 8 are produced through the intervention of the research project itself. Some of the other groups (such as 1, 11, and 12) are categorically invoked in and of themselves, absenting any particular researcher's interests in them. That is to say, these groups are nominalized, and thereby normalized, as research-salient categories, where this status is a consequence of existing social arrangements rather than an emergent feature of a given research intervention. The form anticipates interest in these categories, and prefigures such interest as something the researcher should be prepared to account for.

Another important implication of the list above is that, in mobilizing these distinct categories as salient, it bundles the principles of the *Statement*. Some of these categories warrant respect on account of their vulnerability (e.g., 3 and 9), some of them are entitled to respect in accordance with cultural sensitivities (1 and 12), and some of them could compromise the merit of a particular project (2, 5, and 6). The appearance of these latter groups demonstrates how the principles suffuse the questioning in the forms. Category 2, for example, implies that data have not been successfully de-identified (poor data handling lacks merit), that proper consent was not secured (such that participants were not granted sufficient

respect, but also via a process failure lacking merit), and that both omissions were carried through to final reporting. By the latter, the project and the researchers lacked merit, exposing themselves and their host institution to reputational risk. The principles of the *Statement* thus rebound or ricochet around how categories of prospective participants are formulated in the ethics applications.

We can slow the trouble in the form down further. Consider the form as the site of a kind of drama involving a few key players. First, we have the form itself as the technical instrument proxied by or standing for the HREC, which itself stands for the imagined research community and the institutional context defining and facilitating research as such. The form in its entirety plays this role and is phrased as having assumed the rights and entitlements to do so. In turn, the form is the medium by which the applicant officially enters the institutionally approved research community, and thus requires the researcher to write in conformity with the genre parameters of the form. The researcher and the project must be phrased so as to be legible as instances of the genre.

Second, we have prospective research participants. The form (quite literally) frames others as warranting protection from researchers, or at the least, suggests these others ought to be left alone by them, such that any stated intention to do otherwise entails an appropriate justification. The form knows better than the researcher, and presents itself as an intervention or gatekeeper (which it is). Although that is how the issue I am interested in becomes visible, it is not what I am interested in here.

Third, we have the researcher. What I am emphasizing here is not that the researcher is required to occupy a particular subject position (although, as I will show presently, she is). I am not interested in how the form works as a kind of Foucauldian discursive technology (Guta et al., 2013; Halse & Honey, 2007). Rather, I want to highlight the moral position the researcher is required to assume and describe in relation to prospective research participants, to get the form through.

With respect to these participants, the form divests from the researcher and bestows on the HREC the position researchers are deemed unsuitable to take independently. The form is to provide the HREC with enough information to act on behalf of participants, by determining for or against the proposed research described in the form. Through the form, the HREC is thus granted exactly the kind of power prospective participants are apparently being protected from: the HREC decides for them (Juritzen, Grimen, & Heggen, 2011, p. 646).

At the same time that the form apportions power, responsibility and control in this way, it drives the applicant to formulate respect for prospective participants in a way which is at cross purposes with the ostensible objective (i.e., it is not respectful to participants or, incidentally, to researchers). This becomes more explicit in free text as opposed to check box instances:

Is the research targeting any particular ethnic or community group?

Yes

No

(See *National Statement* 4—Ethical consideration specific to participants, 4.7—Aboriginal and Torres Strait Islander Peoples, 4.8—People in other countries)

If you answered "No," proceed to SECTION 4

If you answered "Yes," which group is being targeted?

Will recruitment be conducted in consultation with a representative of this group?

Yes

No

(a) If you have not consulted a representative of this group, please provide your reasons for not undertaking any consultation.

(b) If you have consulted a representative, with whom have you consulted?

How do they represent this group?

The implications of the conflation of "any particular ethnic or community group" with the categories "Aboriginal and Torres Strait Islander Peoples" and "People in other countries" are for current purposes especially illuminating. Clearly, some people are of interest to researchers primarily in terms of their culture or ethnicity (and this targeting can itself be ethical). By the same measure, there are other people (specifically, people who devise and fill out forms like this), whose culture or ethnicity is of interest to us on account of its *exscription* within the bounded space produced and held by the form (Nancy & Lydon, 1990). The tacit ethnic center of Australia, both indexed and occupied by the form, is thereby exposed. The form erases or evacuates the concrete social positions from which it is to be filled out, and from which it is to be read. The situated location where the producers and users of the form encounter each other to document the practical ethics of the future research encounter is depopulated, and yet demands a clear and unambiguous report on the anticipated sensibilities of others elsewhere (where the researcher herself is presumed not to be such an other, and to accept and enter dialogue from this shared position).

The very fact of the existence of the form and its being filled out is (for all the emphasis on research cost/benefit reflexivity) certainly not to be taken as an instance of culture or ethnicity, it is "above" or "over" culture and ethnicity, and legislates them as things one ought to be careful about

stumbling around in, like wildflowers or mushrooms. The form positions itself as beyond or outside of culture, as having no culture at all:

> Consider whether the project requires ethical or cultural approval by other bodies. If yes, name the other bodies and provide evidence of the permissions.

> Ethical considerations may exist relating to participants' perceptions, beliefs, customs and/or cultural heritage. Are there considerations of this kind specific to this research? If so, please specify and explain how the research design has addressed them.

> Consider whether the project requires the researchers to be aware of, and use, culturally appropriate practices for any reason (national, social, professional). If yes, explain what they are and outline how this will be managed.

Running respect and proper attendance to future risk/benefit evaluations together implies a research encounter where it is already known exactly what sensitivity or consideration might arise. To require such an (unethical) assertion of knowledge from the researcher is itself arguably unethical, as it presumes the researcher knows in advance what someone else thinks is culturally significant and, in a slight refrain, does not need to bother to check with anyone whether they are right about that. The understanding of ethics is unilateral, projected by the expert applicant filling out the form, and the entire research process is to be narrated *a priori* as structured in this way. The form asks for too much, and asks that it be expressed as too little.

This is distinct from the peculiar epistemological assumption that the researcher knows enough about what she wants to find out about to know what is sensitive about it, but needs nonetheless to go and find out just a little bit more about it (not so much, after all, that she might not know in advance any more whether or not or how it is sensitive).

The form, in short, requires the researcher to document their practice in an unethical way, in that they cannot know all of this in advance: they must present disingenuously to the HREC to "pass." Furthermore, nor should they claim beforehand that they already know this about other people (because they ought not presume to know who might deem what a significant consideration along these lines, independent of the presumption that this is a particular and exclusive feature of the categories of persons deemed culturally sensitive in just this way).

Research is conducted ethically when researchers cannot "see," or rather are prepared in advance to disavow, the contingency and immanence of ethical engagement in the field (both unforeseen ethical dilemmas, and unanticipated actual insight into ethical practice). Assurances of this disavowal are required to conduct research, and more pertinently, to write it up, and thereby transmute findings into media suitable for circulation. As we will now see, ethics approval is the warrant for such circulation: the approved project is just as ethical as all the other approved projects.

Ethics and Datafication

Because discrepant practices are treated as equivalent under the banner of "research," HRECs are required to evaluate like with unlike. The form is the locus of standardization for this process. In being rendered through the form as a threshold into the systems of value by which the political economy of academic research functions, all approved projects become equivalent. The form sacrifices the complexity of engagement at the altar of commensurability.

This is the organizational accomplishment of the form: inaugurating research as a practice constituted by the collection of data. In all instances, a central line of questioning formulates research in these terms and asks how data will be collected, analyzed, and stored:

Data Security

Who will own the data?

. . .

Will any of the data be retained for ongoing use (e.g. databank, archive, tissue bank)? If so, please provide details. Explicit consent must be obtained for this.

How long will the data be stored? If it is not being stored, please provide an ethical justification for this.

The minimum storage period for university research is 5 years after the project is completed.

Ethics are at this juncture attenuated to ensuring clarity for participants with respect to the information arising from research as a form of property, while research is figured as data extraction:

Consider ownership of the information, in terms of both where local and traditional knowledge are involved and where personal information is being collected. It is important that participants are clear about who will own the information and the outputs.

What control, if any, will participants have over the information gained from or about them?

In a blunter example:

Who will own the resulting research data and the created intellectual property?

Place an "X" in the relevant box/es below—at least one box must be checked. If relevant you can check more than one box

Research formulated as an extractive process here sharpens the meaning of "ethical" to a point that not only permits but entails such extraction. To be an ethical researcher in the world conjured by the form is to take something and segment it effectively from who and where it was taken from, rendering it discrete material. Only when it has been properly separated from its context does it become data, something that can be collected and owned (Markham, 2013).

As Ana Gross (2012) explains, ethics documentation enables the production of data (sets) by untethering what she calls "vital emissions" (utterances, practices, biological material, other features of human life) from their individual "authors," recombining, aggregating, and categorizing them as commensurable with other such emissions produced by others. The "social" of "social research" is thereby produced, an aggregate or equivalence class. Ethics review is the institutional guarantor of methodologically and ethically sound commensuration and equivalence (van der Vlist, 2016, pp. 2-3). Data have been "dividualized," amputated from their context, standardized and objectified in the proper way.

The ethics approval form (specifically, in its projection of the consent document) is the formal mechanism initiating research as datafication for the applicant. Informed consent acts as a "surrogate property contract" (Gross, 2012, p. 119). Through the consent document, participants relinquish "rights" in some feature of their vital emissions and any further value that may arise from their use. This is what renders the matter of persons into thinglike data.

Data rendered commensurable in this way, and the outputs that arise from them, can be circulated into networks of equivalence, exchange, and ownership. Their positions and worth can be calculated in regimes of value and rank (IP, H-index, journal rankings, "impact" metrics, and so on). The ethics approval form is thus in procedural terms a substrate document, introducing researchers and research into the systems of evaluation which assign reputational and economic currency to research, to researchers, and to their institutions.

Conclusion

Ethics forms are intended and designed as texts-in-use. They are not meant to be read: they are meant to be filled out. What is asked and what is not asked, the order and format of the questions, constitute and impose a representation of a preferred vision of research activity. What warrants attention is "the shape created by the gaps in the form" (Riles, 2013, p. 562). The shapes the questions take make tangible a kind of meta-data moral ontology, what can be known or should be said to be known at the outset by competent researchers, and what ought to be known, what is sufficient to be known, about what researchers are doing, in order for it to be said that their works is "up to scratch" ethically.

The ethics review form claims a monopoly in ethical oversight, including over investigations that may trouble participants' normative cultural frames. Beyond instantiating just such a frame itself, the form is a constitutive gatekeeper in the institutional organization of research culture.

Perhaps a counterargument would assert that the ethical standard the forms have been held to in the pages above

comes from a different domain, and is not suitable for application here. It is this mechanical functionalism that provides the forms with their own ethical escape route. To allow this as routine, sliding into an ethically evacuated void between means and ends, is to practice doublethink.

As a compulsory ritual process, the form is ethically consequential in that it asks all who encounter it to turn a blind eye to those features of it that have been discussed here. As it mobilizes personnel around it, it also sits in their world as a mute assertion of discrepancy, requiring their complicity. The process the form instantiates requires conformity; the shrug and knowing wink to get things done. Few people who routinely encounter such forms wish to be deemed unethical researchers. Many encounter them in the course of activities for which they receive salaries. The form, in more than one way, evidences and constitutes the power dynamics of research ethics as a living institutional practice, in the social world of the university and as the procedural hinterland to the encounter with the other that is called "research."

Declaration of Conflicting Interests

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Note

1. In such instances, I requested and received copies of the form by email.

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Author Biography

Andrew Whelan (PhD Trinity College, Dublin) is a senior lecturer in Sociology at the University of Wollongong, New South Wales. His research interests include online music subcultures and the circulation of music in digital formats, and bureaucratic administration through digital documentation.