Chapter 21 - Ethics in qualitative research *Qualitative methodologies in organization studies. Volume 1, Theories and new approaches*[ISBN: 9783319652160] / edited by Malgorzata Ciesielska, Dariusz Jemielniak.

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21.1. Introduction

Qualitative researchers working in the diverse field of social sciences need to address ethical issues at every stage of the research process (Clegg and Slife, 2009; Kolman, 2004), regardless of the perspective, research design or methods of data collection they opt for. As is widely recognised, ethical thinking in qualitative research goes beyond ethical decisions during data collection and analysis (Kara and Pickering, 2017) and concerns broader issues such as presentation and dissemination of research results, public engagement or the depositing of data in research databanks in order to make them available for other researchers, which is increasingly required by funding bodies. In the light of the rapidly changing research landscape that has, in many contexts, become subject to stringent formal ethical review and governance and where technological advances have offered new possibilities for research innovation, long standing ethical issues have taken on new meanings and new ethical dilemmas have emerged (Mauthner et al. 2012). For example, visual methods, many of which are innovative and pioneering (Howell et al, 2014), often force researchers to reconsider their responses to a range of crucial ethical issues, which include, but are not limited to, informed consent, confidentiality or ownership, along with questions around data presentation and dissemination (Cox et al, 2014). Similarly, academics conducting internet research, the context and scope of which have grown exponentially, need to navigate complex ethical terrains. In this context, Birch et al (2012: 4) might indeed be right when they observe that "ethics matter more now than they did a decade ago".

The significance of ethical issues in empirical research, employing both qualitative and quantitative methodologies, is reflected in the plethora of codes of ethics put forward by

relevant professional associations (e.g. Association of Internet Researchers, British Sociological Association or its American counterpart) and the growing institutional regulations which increasingly not only seek to guide but more recently also to govern the work of researchers. Although the importance of ethical guidance and the associated relevant training for researchers is rarely, if ever, disputed, the institutional approach to research ethics, sometimes referred to as ethics (Haggerty, 2004) and "audit creep" (Stanley and Wise, 2010:25), has come under strong criticism (for a more detailed discussion see e.g. Cannella and Lincoln, 2007; Coupal, 2005; Hammersley, 2009; Hedgecoe, 2008). As authors point out (e.g. Birch et al., 2012; Hammersley and Trainou, 2012; Stanley and Wise, 2010), the idiosyncratic qualities of qualitative research which typically involve a considerable degree of flexibility of the research design, and the collection of (more or less) unstructured data that is typically collected in natural settings are not easily reconciled with the standardised, and largely inflexible external formal ethical regulation that relies on universalist principles and generalist criteria. This recognition notwithstanding, the remit of Research Ethics Committees (RECs) and the associated anticipatory, pre-study ethics regulation (Mautghner et al., 2012) has been expanding. This trend, however, has not reduced the ethical challenges faced by qualitative researchers and there is still considerable ambiguity surrounding ethical decision-making as more "than one set of norms, values, principles and usual practices can be seen to legitimately apply to the issue(s) involved" (Markham and Buchanan, 2012: 5). In fact, as some authors observe (e.g. Tilley and Woodthorpe, 2011), ethical governance can at times exacerbate, rather than reduce ethical tensions and can itself pose new ethical dilemmas. For example, researchers can be required to deposit their data in research databanks so that others could re-use them in the future. This requirement, however, as Mauthner et al (2012:180) observe, "raises ethical and moral issues about the responsibility that we take as researchers for the methods we use; for how we carry our research and for the context in which this occurs". Ethical requirements associated with procedural ethics (Guillemin and Gillam, 2004) therefore need to be supplemented with professional guidance, theoretical models and "contextualized reasoning" (Birch et al, 2012:6) which can help researchers negotiate ethics in practice (Guillemin and Gillam, 2004) in dynamic research settings (see also Markham and Buchanan, 2012).

In the remainder of this text we revisit some of the most commonly recurring ethical issues facing qualitative researchers at different stages of the research process and point to some of the new ethical dilemmas associated with the changing research landscape and innovative research methodologies. Those interested in the philosophical considerations regarding research ethics may refer to the more specialist sources, such as Kent (2000), Christians (2011) or Hammersley and Traunou (2012). Similarly, others looking for more detailed discussions of ethical challenges linked to specific methodologies and approaches can consider the already available relevant sources, such as Cox et al (2014) for guidelines for ethical visual research methods or Markham and Buchanan (2012) for recommendations for internet research. The questions we focus on are intended to serve as an illustration of the multitude of ethical issues social scientists are faced with in their daily practice, rather than a comprehensive review.

21.2 Informed consent

One of the most central requirements of research ethics committees, and arguably also one of the most often debated ethical challenges, is the need to obtain informed consent from the prospective research participants. Despite the seemingly commonsensical nature of this postulate according to which those invited to take part in research have to give their (usually written) consent to participate in the project after having been informed about the nature, purpose and outcome of the study and their role in it, as well as the possibility to withdraw from the study (and the unprocessed data that they helped generate), its implementation in different research settings is certainly far from straightforward, in particular when considered in the context of longitudinal research projects, or with studies utilising more participative methodologies.

While ethics committees typically require obtaining consent once, usually prior to data collection, compelling arguments have been put forward suggesting that consent should rather be regarded as a matter of on-going negotiations between the researcher(s) and the research participants and revisited as the research evolves. According to Birch and Miller (2002), for example, a one-off consent – regardless of whether given orally or made in writing – is insufficient, especially when it comes to ethnographic studies or other kinds of longitudinal qualitative research projects which require longer-term involvement of the research participants. As shown by the said researchers, participation in such studies requires a different kind of commitment and that is why, as argued by Birch and Miller (2002), it should be subject to continuous renegotiation. They further suggest that researchers have an obligation to remind their participants on a regular basis that they may revoke their consent at any time. This point is further reiterated by Neale (2013:6) who observes that "well established ethical principles [such as consent] take on new meaning and need reworking when seen with a temporal gaze". In longitudinal projects, the ethical landscape, as the author argues, gets broadened and becomes further complicated. Participants may choose to withdraw temporarily from the research project but simultaneously reserve the right to re-join at a later stage. When the timeframes of research get extended, so does the likelihood that earlier unforeseen ethical challenges will emerge (op cit). But it is, however, not only the consent to participate in a research project that may be subject to renegotiation between researchers and their participants. As a research project evolves, the nature and the scope of participation may also need to be renegotiated. As already mentioned, many researchers point out, (e.g. Miller, Bell 2002; Duncombe, Jessop 2002) at the beginning of a research project, both researchers and research subjects are not always able to accurately assess the potential impact of their research on their participants, not are the participants often in a position to fully grasp what taking part in the study entails. It is also important to remember that research participants" personal circumstances may also change with time, which may, in turn, have an impact on their participation. This is why an

option to renegotiate one's consent to participate in research and the scope of such consent is an important ethical issue.

In the context of visual research methods, Cox et al (2014:12) propose to view consent as "a series of decision that take place at pre-identified points as project unfolds". As the authors outline, in visual methods consent refers not only to the generation and collection of visual images. Importantly, it also applies to their analysis, presentation and crucially dissemination among different audiences. Cox et al (2014) therefore recommend seeing consent as composing of different levels and stages, a point which is well illustrated by Murray and Nash's (2016) paper discussing ethical challenges of photovoice and photo elicitation in two separate studies carried out by the quoted authors, one of which explored embodiment of pregnancy in Australia, whereas the other focused on the experiences of infant setting in Vietnam. The authors explain how in the Australian study three different consent forms were used at different stages of the research process which not only sought to explain participants" rights and responsibilities (consent one), but also focused on obtaining consent from others who appeared in the photographs (consent two). In particular, the last stage of negotiating consent described by the authors is instructive. Murray and Nash (2016) describe a detailed process of consulting with participants the extent to which they consented to their different images being disseminated and shared with the academic audience and the general public, a procedure of "different levels of consent" also usefully described by Lunney et al (2014) in the case of photo elicitation research into young women's experiences with drinking alcohol. Another challenge related to the requirement of obtaining informed consent from research participants is linked to wider cultural and institutional norms of a given research setting, which in some situations might run counter to this requirement. For example, Marzano (2007) conducted a research project into the experiences of the terminally ill at an oncological ward in Italy. However, in Italy at the time of data collection the dominant institutional norm, as Marzano explains, was not to inform the terminally ill patients of their actual condition. In such institutional contexts where the

commonly held belief about the detrimental effects of revealing to patients information about their condition is deeply rooted in the local culture, the researcher may decide not to violate this norm and, therefore not disclose the purpose of their research. Marzano admitted that if he had revealed the real purpose of his research, he might have been forced to leave the research site and, most likely, might also have been forbidden accessing it again so he decided to observe the cultural and institutional norm to withhold crucial information from the studied patients. As the author revealed, his decision come at a considerable emotional cost to him. The requirement to obtain informed consent from participants – like many other ethical issues – becomes further complicated in the context of internet-mediated research projects. As argued, among others, by Ellen Whiteman (2007), when doing (non-participant) observation online, it is not always clear what can be considered a private and what a public domain. Is it necessary to reveal one's identity when exploring and investigating internet forums or online community networks? Or can we recognize them as public domains that may be monitored without the need to inform our research participants of the conducted study? There are different recommendations on this matter. Kozinets, for example, writing about nethnography and nethnographers as cultural participats rather than unobtrusive observes (2002; 2015) calls for a full disclosure of researcher's identity and explains that even though information posted online is generally freely available, this fact does not mean that its authors automatically consent to it being used for academic purposes. According to Kozinets (2015: 139), the Internet ,is not either public or private; it does not simply contain data but digital doubles of our identities and selves" and therefore it requires more "creative and bricolage-based solutions" to ethical dilemmas (op cit: 139). He further lists a range of strategies researchers can use to inform research participants of the researcher's identity (such as posting relevant information in status updates or next to the researcher"s name or using pop us). Others (e.g. Langer and Beckman, 2005) see the recommendations put forward by Kozinets (2002) as "far too rigorous" (Langer and Beckman, 2005: 195) and argue that nethnograpy "enables the researcher in an unobtrusive and covert way to gain deeper insights" into people's options and motives. Finally, and relatedly, the requirement to obtain

"informed consent" poses considerable challenges to conducting disguised observation. Even though disguised observation is increasingly seen as problematic, there is a number of excellent ethnographic studies developed on the basis of this method. Ethics committees usually underline the need to inform research subjects of the fact that there is a research project conducted with their involvement, and of the purpose of any such research project. There are, however, exceptions to this rule. It might be possible to opt for disguised observation if there is no other suitable method of studying a given research problem. Disguised observation may be also performed in studies of public behaviour, as already indicated, where the identity of research participants will remain unknown. In such cases, the recommendation is to monitor the behaviour of research participants, and to treat even potential signs of reluctance as refusal to take part in the study. However, even following such recommendations does not fully ensure ethical conduct. We can wonder to what extent researchers be really trust their ability to accurately interpret the intentions of their research subjects. Is there really a guarantee that the identity of the research subjects will remain anonymous? These and many other questions show the complexity behind ethical considerations while doing fieldwork – even when one tries to act according to the already strict guidelines.

Tina Miller and Linda Bell (2002) raise an important question of the role of "gatekeepers" in obtaining participants" consent. One of them - Linda Bell - conducted an interview-based study of a group of Bangladeshi women living in southern England, the access to whom was secured by a person closely involved with the community of interest. However, although the gatekeeper"s support made it possible for Bell to obtain access and to secure consent from the research participants, she quickly realized that her participants were in fact rather reluctant to take part in her study. She came to a conclusion that their consent was largely motivated by respect and a sense of obligation towards the gatekeeper, rather than their actual willingness to take part in the project. The gatekeeper was held in high regard in the studied community because of her origin and background, and the related social status.

Questions, therefore, arise as to the extent to which one can treat the obtained consent as a sign of participants" readiness to take part in the study of their own free will. Similar questions emerge in the context of research in organisational settings, To what extent, for example, do employees who have agreed to take part in a study upon a request set out by their superiors have an actual option to decline this invitation? How can we know whether their consent is not primarily driven by fear of being punished if they do refuse to participate?

21.3 Protection of research participants' identity

It is widely accepted that researchers are obliged to protect their research participants (and themselves) against any undesirable effects of their study. The requirement of doing no harm and the obligation to protect one"s research participants have contributed to the practice of treating the identity of research subjects (i.e. people, organizations, and selected social groups) as confidential and substituting it with pseudonyms in reports and publications of the results. Granting research participants" anonymity often involves omitting or obscuring certain information in publication of research findings that could make it possible to identify the said participants. However, despite the fact that anonymity has started to be perceived as an ethical norm, in the changing research landscape securing anonymity has been increasingly challenging. Internet research is a good example of the potency of this problem.

The longevity and ease of traceability of information published online coupled with the common requirement to aim to widely disseminate one's research results to a range of audiences mean that standard solutions of securing anonymity are often no longer fit for purpose and researchers can no longer control how the data they share is consumed and reproduced by others (e.g. Tilley and Woodthorpe, 2011), including the research participants themselves (see e,g. Lunnay et al, 2014). While some practical solutions have been proposed how to overcome these challenges, such as rephrasing or avoidance of direct quotes (see e.g. Kozinets, 2015), it has also been suggested that "the standard of anonymity in the context of the twenty first century academic work may need to be rethought" (op cit: 1),

as even seemingly anonymised data can contain sufficient information to lead to identification of a given participant (Markham and Buchanan, 2012).

Similarly, the requirement to protect the identity of our research participants is also problematic in the context of participatory and emancipatory research methods where the issues of anonymity need to be evaluated against the notions of shared authorship and empowerment. As observed by Tilley and Woodthorpe (2011), in some contexts the otherwise seemingly uncontentious principle of anonymity can be at odds with the aim of the research and the dissemination plan. Participatory research designs therefore typically seek to give participants" choice as to whether they wish to retain anonymity or whether would rather their identity was disclosed (Tilley and Woodthorpe, 2011). As Christians (2011: 66) observes, anonymising procedures which "researchers consider innocent [can be] perceived by participants as misleading or even betrayal", especially when they see themselves as important contributors to the research project. In a similar vein, strategies of anonymising images in visual methodologies, such as blurring and obscuring techniques, do not also always offer full anonymity) and can have the unintended consequences of compromising the authenticity of the image and dehumanising the research participants (Cox et al., 2014).

These challenges might best be taken into consideration already at the planning stage of the research and revisited when negotiating consent. Ethical dilemmas might also arise when the participants" right to anonymity is in conflict with rights of other parties. One such situation is described by John Van Maanen (1983) in relation to his ethnographic study of the NYPD. Van Maanen was asked to testify in a case of a man who had been battered by the police, an incident which Van Maanen witnessed. In this case Van Maanen refused to cooperate with the police, in order to protect his research participant. His decision, however, can be interpreted as potentially detrimental to the broader community. Relatedly, Sabir and Sabir Ben-Yehoshua (2017) have illustrated how participants might deliberately seek to potentially compromise their own anonymity in order to punish a member of their family (e.g. an ex-husband). Should we then respect the wish of our research participants, or should we

rather choose to protect them and their environment against their recommendation? How to act if the findings of our research may benefit the majority of the community under study, but harm its minority? The existing source literature does not offer straightforward answers to the above questions. Instead, ethical choices are seen as being highly context dependent and "requiring contextualized reasoning" rather than an application of "abstract rules and principles" (Birch et al, 2016: 6), as well as an informed dialogue between the research and their participants (Sabir and Sabir Ben-Yehoshua, 2017).

21.4. Maintaining relationships with research participants

Many ethical issues in qualitative research based on direct relationships with research participants are related to commencing, maintaining, and ending those relations. Jean Duncombe and Julie Jessop (2002) note that ethical issues already emerge at the stage of preparation for fieldwork. It is commonly believed that the ability to establish relations with research participant is very important for qualitative researchers. The skill is often considered to be a prerequisite for building trust with participants which, in turn, is expected to help the researcher obtaining more honest answers from research participants and richer data. But such an instrumental approach to building and maintaining relationships with research participants raises some considerable ethical questions. Critics of this approach (e.g. the earlier cited Duncombe and Jessop 2002) point out that in this perspective relationships with research participants are treated as a form of emotional labour (Hochschild, 1983). In practice, "establishing relationships" in the field may at times manifest itself as "faking friendship" in the field and, as argued by its critics (e.g. Fine 1994), it may in fact be more common among field researchers than research reports would lead one to believe. Others, e.g. Beech et al. (2009) call on researchers to get more involved with the problems of the communities they research. They point a possibility of establishing mutually beneficial relationships which not only help the researchers secure better access to data, but support the studied communities in solving local issues.

The complexity of relationships with research participants and the related ethical issues are also covered by Duncombe and Jessop (2002) who give an account of how their ability to "establish relationships with research participants" enabled them to obtain much more information than their research participants were initially willing to share with them. However, the researchers also point to the negative consequences of this. Jessop, for instance, conducted an in-depth interview with a man who was left by his wife after a long marriage, and obtained an extensive account of his past experience he had not even shared with his wife. The interview ended with the man bursting to tears and the researcher leaving with a sense of guilt. By quoting the above example, the authors contribute to calls for respecting the research participants" right to ignore their deepest thoughts if they wish to do so. They argue that no research should force participants into reflexivity they find unwelcome.

The matter of emotions in research is yet another ethical issue related to establishing relationships with research participants. This concerns both researchers" and research participants" emotions. According to guidelines included in various codes of ethics, research should not cause emotional harm to research participants. But researchers are not always able to foresee which of the questions might evoke a strong emotional reaction in our participants. For example, one of the authors of this chapter conducted a study into a culture of two different organisations. When she asked one of the research participants about her views on and experiences with the company value of "care", the research participant unexpectedly burst into tears midway through her answer. While the researcher did not intend to raise any topics that could evoke a strong emotional response which did not even seem necessary in the case of a culture study, it turned out that the above mentioned and seemingly neutral question about the core values of the company reminded the research participant of her child's death – and of the support her superior at the time gave her child beforehand. To her, the superior's attitude was a real-life embodiment of the value of "care". The researcher's question led to an emotional tension and inadvertently made the research participant recall painful memories. So what to do in such a situation? What could

be considered ethical behaviour in this case? Stopping the interview? Turning the voice recorder off? Showing empathy, compassion? Proceeding with the subject? Maybe it would have been reasonable to continue probing the participant about her superior to thus allow the participant experience more positive emotions and help her compose herself. The researcher, surprised with the turn of events, let the research participant finish the topic, and went on to continue the interview, carefully monitoring the participant, without interrupting the interview.

Two other researchers, Wendy Mitchell and Annie Irvine (2008), who also encountered strong emotional reactions among their research participants in the course of their studies, formulated similar ethical questions. Each of them reacted in a different way to the emotionally charged situations, which has prompted them to argue for need for a more conscious approach to the emotions management in research. They recommend trying to predict, as much as it is possible, the emotional responses of one's participants and considering how best to react to them prior to data collection. It is important to remember that research participants might themselves be well placed to communicate to the researcher how they would prefer to proceed after an emotional encounter. Researchers identifying themselves with the feminist perspective draw attention to further ethical considerations when doing fieldwork. They not only endorse the basic principle of doing no harm to research participants, but they also call for the need to approach research participants with care. How exactly to use the principle of care into practice tends to be viewed differently by authors and can itself pose a number of ethical challenges (cf. Mitchell and Irvine 2008). If a research participant, for example, reveals in the course of the interview, something that troubles them, should we offer our help, if we are in a position to provide it? To what extent are we – as social researchers – in a position to offer emotional support to our research participants? How can judge whether our research participants would actually welcome our offer to help? What possible consequences can researchers" involvement have?

The issue of relationships with research participants becomes even more pronounced in the case of longitudinal research project. It is important for researchers conducting extended fieldwork to be able to set and manage boundaries of the relationships and mutual expectations (see e.g. Lunnay, et al, 2014; Neale, 2013). This need can appear quite early on in one's research project and one's career. One of us, for example, was faced with a challenging situation while conducting the third interview in her academic career. The researcher was to conduct a series of interviews with employees working in the same department in a large multinational corporation. As it turned out later, the department was also a place where three female employees battled fiercely for a managerial position. The first interviewee (let"s call her Anna) offered the researcher a very warm welcome; she suggested they call each other by their first names, contrary to the local custom; and offered to allocate more time for the interview after its allotted time had run out. The interview was to continue after work in a nearby café. The inexperienced researcher was glad to take the opportunity and was happy with the friendliness she was approached with. The following day, however, when she met another interviewee, she realized her enthusiasm was premature. By that time (the morning of the following day), it appeared that almost all employees of the company were convinced that the researcher was "Anna's friend", which triggered mistrust towards the researcher and made it virtually impossible to proceed with the research project.

21.5. Presentation of field research findings

As has been stated earlier, guidelines on dissemination and presentation of findings can at times run counter to the wishes of research participants. In particular, in participative and emancipatory research methods, such as photovoice, where such discrepancies can pose considerable ethical dilemmas for the concerned researchers, as well captured by the earlier cited study by Murray and Nash (2017). The authors illustrate how the guidelines put forward by the British Sociological Association (2006) which, quite uncontroversially, outline that researchers must avoid potentially inappropriate or sexually explicit images, were seen as

problematic in one of their studies (carried out by Nash) on pregnancy embodiment. As it turned out, a number of participants produced and shared nude images of themselves in order to fully address the question they were set to explore and to depict their lived embodied experiences of pregnancy. Contrary to the ethical guidelines but with informed consent from the participants, Nash has published the nude images, which admittedly did not show participants" faces.

Upon giving a formal consent to participate in a research project, organizations often reserve the right to obtain a report of the study. It is important to note, however, that it is the researchers who assume full responsibility for the conclusions they draw and are not obliged to include the feedback they may get from the organisation in future publications. While it is now customary for organisations participating in an academic study to expect a report from the project, the time lag between data collection, analysis and preparation of the report may at times discourage researchers, despite their earlier assurances, from sharing their results with the concerned organisations. We believe that it is important to provide research participants with the promised information and see this as part of the research project.

It is also helpful to prepare oneself for the eventuality that our research participants do not react as positively to our findings and conclusions as we would hope them to. Participants may at times find it hard to accept the conclusions drawn by the researcher. However, it is important to acknowledge that sharing our results with the research participants may also add significant value to our projects. Indeed, in some of our past projects, our participants did us a great service by taking the time to read our research reports and provide us with some additional contextual information that proved highly insightful when we started working on subsequent publications from that dataset.

We witness nowadays growing pressures on researchers – also qualitative researchers – to put their data in open-access repositories to enable cross-checking and replications of the original study. Sometimes it is a formal requirement of external funding bodies non-

negotiable by the researcher. This raises a serious issue of confidentiality - "a complex process that involves more than merely disguising the identities of research participants or sites (Tilley and Woodthorpe, 2011: 3). If the data is to be made available for re-use by other researchers, one should pay particular attention to protecting participants of the research. Moreover, they should give explicit consent to making data available after the research project is completed.

21.6. Conclusions

It is important to remember that researchers act as representatives of their respective academic disciplines, which gives rise to particular ethical obligations – an obligation towards their academic community and obligations towards their research participants.

Ethical dilemmas faced by qualitative researchers may arise from tensions when various – often conflicting – principles meet. Although there are codes of ethics for researchers, they may only act as guidelines since research work involves dealing with unpredictable dilemmas that often require researchers to make judgement calls and to resolve them independently, on an on-going basis, as our research evolves. We believe that many ethical dilemmas are simply insoluble; researchers often face situations where a number of principles of ethical conduct may appear to be conflicting with one another.

We agree with Wolff-Michael Roth (2005) and others (e.g. Markham and Buchanan, 2012; Miller et al, 2012) who argue that it is impossible to reduce ethics in research to an institutionalized set of top-down rules that could be applicable to all contexts. Any "principle has to be interpreted in the light of particular situations – it is rarely if ever a matter of simply applying a rule, calculating what is best, or knowing directly what a situation requires" (Hammersley and Traianou, 2012: 34). Research ethics needs to be regarded as an inherent element of research practice. "Ethically important moments" (Guillemin and Gillam, 2004) and ethical questions appear at every stage of the research process requiring

researchers to make their own choices depending on the context of the research and – most importantly – according to their conscience. Knowledge of codes of ethics for researchers, understanding of various philosophical perspectives on which ethical postulates are based, and reflexivity, increasingly recognised as one of the key quality assurance strategies in qualitative research (Berger, 2013), can all aid researchers in dealing with ethical challenges. As we have attempted to argue in this chapter, ethics is not an abstract notion or a one-off task that needs to be addressed to secure ethical approval. Foreseeing, addressing and reflecting upon ethical issues are part and parcel of everyday research practice. In light of new the changing research landscape and methodological innovations, adopting ,a dialogic, case-based, inductive, and process approach to ethics" (Markham and Buchanan, 2012) might be more conducive to ethical decision-making that is sensitive to (at times conflicting) contextual, cultural, institutional and legal requirements than reliance on regulatory models and procedural ethics.

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