



The Spectre of Research Ethics and Governance and the ESRC's 2010 FRE: Nowhere Left to Hide?

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Introduction

1.1 In 2007, I felt compelled to write about my experiences of applying for NHS ethics and governance approval (NRES, formerly COREC) in a short article published in this journal (Reed 2007). That article was a response to an earlier piece published in the *THES* which focused on the way that NHS research ethics and governance procedures were stifling research through tiresome bureaucratic procedures (Tysome 2007). Drawing on my experience of applying for ethical approval for a small qualitative project on antenatal screening, I highlighted not only the bureaucratic nature of such procedures but also their inapplicability to social science in general and qualitative research in particular (Reed 2007). As my somewhat farcical experience showed, such an extensive and heavily bureaucratic process was not only time consuming but also highly inappropriate. I did not feel that my research was any more ethically rigorous having gone through this process.

1.2 In light of these experiences I decided on two strategies for future research: 1) work with clinicians when undergoing research which requires NRES ethical review because clinicians are better placed to 'play the ethics game' in the area of health research; 2) conduct social research that didn't involve NHS staff or patients. Until recently the latter strategy appeared more feasible given that ethics and governance procedures for social scientists have tended to be far less onerous than those involving the health services. However, with the implementation of the ESRC's 2010 revised *FRE*, this may no longer be the case. The extended form of ethical governance and review proposed under the revised *FRE* appears in many ways to be just as bureaucratic and unsuitable to much social science research as NRES. It would appear that there is no longer a place for social scientists to hide from the onslaught of extensive ethical governance procedures.

FRE and the spectre of governance

2.1 Stanley and Wise (2010) pointed out that with the revised 2010 *FRE* social scientists wishing to apply for ESRC funding will be faced with a significantly extended system of governance for research ethics than was previously experienced. This system of review will be mandatory. Research ethics committees (RECs) will be responsible for reviewing all research proposals accepted by the ESRC. Furthermore, funding will depend on REC review. The expanded review process will be ongoing, extending throughout the course of a project's life. This suggested framework resonates with ethics and governance under NRES. It applies a 'one-size fits all' model to social science research and it signifies a move away from discipline-specific ethical review. Furthermore, the extensive audit procedures outlined under the revised *FRE* (which specifically envisages ethical review as an ongoing process) risks stifling research before it has even had a chance to get going.

2.2 Upon a first glance at the 2010 *FRE*, one is immediately ensnared by the bureaucratic tentacles of extended ethics governance. For example, the revised ESRCs *FRE* 'suggests' that a range of information must be considered by RECs when considering projects under ethical review. The requirements suggested are similarly managerialist to those under NRES. For example, under '1.8 applications and protocols' the ESRC suggests that researchers submit a range of material, from research proposals to consent forms, dissemination plans and information on advisory groups. As I argued in my earlier paper on COREC (Reed 2007), the volume of paperwork in itself is not the main problem here. The inclusion of extensive information about method can actually be very useful in methodological refinement (Reed 2007). The real problem is the prescriptive nature of the paperwork. Underlying these 'suggested' requirements is a Taylorist approach to research evaluation which reinforces the idea that research projects can all be reviewed in the same way. Such an approach fails to acknowledge the specificity of research design and application.

2.3 Furthermore, the much maligned 'tick box' approach to ethics and governance as commonly found in the health sciences makes an appearance in the revised *FRE*. In order for RECs to decide a project's fate in terms of its eligibility for 'light touch' or 'full ethics review' the ESRC *FRE* 2010 recommends that a checklist be compiled for each research project (see its Appendix A). It is deeply problematic to suggest that risk to respondents in social science research can genuinely be assessed by box ticking (Reed 2007). The 'tick box' approach to ethics assessment might be more appropriate to clinical research where the

risks to participants may be more quantifiably measured (Kent et al. 2002). Have we in the social sciences really learnt so little from this problematic approach used in the ethical governance of research in the NHS?

2.4 The one size fits all approach reflected in the revised FRE also evidences a further lack of disciplinary specialism during the review process. The RECs, responsible for reviewing all funded research proposals should, according to the ESRC, be multidisciplinary and include one lay member with no affiliation to a university or other research institution. They should reflect a broad range of research expertise and are not discipline-specific. Can projects be appropriately reviewed by people who know little about the research field/discipline? I suggested in 2007 that this is one of the main problems with NRES; both the forms and the ethics committees themselves are often not appropriately assembled in order to address the ethics and validity of social science health research. Institutional RECs under the FRE could be just as inadequate in examining the ethics of disciplinary specific social research. By failing to adequately address the ethics of research, this process has the potential to undermine its own aim of affording protection to respondents.

2.5 A further problem under the revised FRE, as Stanley and Wise (2010) point out, is the radically expanded nature of research governance auditing procedures. The ESRC FRE states that projects may be subject to on-going review. Should other ethical issues arise during research, a project may be subject to further review, possibly through evaluation by a project advisory group. Furthermore ad hoc audits of research projects may take place on at least one ESRC project per year, randomly chosen. Again, this approach is similar to NRES, where any new developments must be re-evaluated by ethics committees. Such extensive micro-management through auditing places incredible constraints on research projects. Not only will researchers be constrained at the start of the project but also during and after it, as plans for dissemination now also comes under the purview of ethics. Furthermore, people may be put off developing interesting angles to their research during fieldwork due to the need to apply for further ethical review. Faced with such endless bureaucracy and surveillance, many social researchers will simply give up on data collection or produce research of questionable validity that tells us very little about what actually exists out in the field.

2.6 Overall, ethics and governance procedures through the ESRCs 2010 FRE mimic many of those found under NRES. Such an extended form of ethics governance is prescriptive, insensitive to disciplinary specialism and applies an audit-driven standardized approach to social research. Their principles of ethics governance may severely restrict the scope and value of social science research before it has had a chance to begin.

Fostering good practice or putting people off research?

3.1 The UK Research Integrity Office (UKRIO 2009) states that research must be 'governed' by the following principles; excellence, honesty, integrity, co-operation, accountability, training and skills, and safety. However, as with other extensive ethical review and governance procedures, one is left to wonder whether such procedures really do protect and safeguard respondents and whether that is even their motive? As argued earlier, it is unclear as to how making ethics governance so extensive and so intrusive makes research any more academically rigorous or ethically sensitive. The more paperwork requested, the more research design and implementation becomes formulaic. Subsequently researchers respond to such requests in a way that is similarly detached. Time and time again I have heard health researchers saying 'oh I can do ethics in a day'. The idea that 'doing ethics' can be separated from 'doing research' really highlights the ways in which extensive review processes are far removed from the process of evaluating ethical issues in research.

3.2 In evaluating the 2010 FRE, one also wonders how much are its aims really about ensuring that UKRIO's ethics governance principles are put into action? The aims of these can in fact be set in a broader context of a breakdown of professional trust and a 'culture of fear' under which health professionals and researchers have operated since the Alder Hey scandal (Reed 2007). Undoubtedly, the extended ethics and governance process outlined under the revised FRE can be situated in broader debates on the culture of fear. Organizations and individuals are increasingly encouraged to take extra precautions in order to protect themselves from perceived risks and dangers (Furedi 2002). However, with the ESRC's revised FRE one also has to wonder what other motives are at work. For example, is giving independent RECs more power to assess ESRC research proposals a way of safeguarding respondents and ensuring sound research? Or is it simply a way to devolve paperwork and responsibility away from the ESRC to other institutions? Such a deferral of responsibility surely indicates another form of Foucauldian governance whereby we become complicit in the construction of our own iron cage of research bureaucracy (Foucault, 1980, 1983)?

3.3 Furthermore, is this extended framework about ethical governance or is it about saving money for the ESRC? With the spectre of severe funding cuts looming large with the 2010 Comprehensive Spending Review, is this recommendation for extended forms of research governance just another way of putting people off applying for what limited pots of money the ESRC has? Although all researchers applying to ESRC must also apply for independent ethical review, they are most likely not to receive funding from the ESRC. As the ESRC itself states, 'a significant proportion of applications are not funded' (ESRC 2010: 10). The rules of the ethics game have, therefore, changed. Researchers are no longer 'playing ethics' in order to start research. They are playing in order to be considered for funding. Playing the ESRC ethics game under the revised FRE is therefore a bit like playing poker, where the stakes might be high but your chances of success are slim.

3.4 The extension of ethics procedures under FRE is perhaps the final nail in the coffin of applying for ESRC funding for social scientists. Regarding my own research, I have focused my energies on health-related research in the biomedical sciences. At least health ethics and governance under NRES are currently separated from funding. Another of my strategies has been to work with clinicians who know about ethical review under NRES. The ESRC FRE states duplication of ethical review should be avoided. FRE guidelines state that applicants do not need to go through ethical review procedures under ESRC remit if the study may fall under the rubric of other ethics committees. This means that for me there may be benefits in targeting NRES after all; at least theoretically, through NRES I can apply to target specific patient groups rather than trying to find alternatives under the FRE. Although the process is burdensome, at least going through NRES widens the pool of groups of people that I can research.

Re-instating the benefits of social research

4.1 Despite trying to seek alternatives to the ESRC's *FRE*, it is important here not to be defeatist. I agree with Stanley and Wise (2010) that we also need to collectively resist 'ethics creep' in the social sciences. If we accept the Foucauldian concept that governance is generated from the governed rather than imposed by the government, then strategies for addressing ethics and governance creep should come from within the social science community itself. While obviously we need some form of ethical governance, such an extensive set of rules and regulations are simply not appropriate for much social research. Projects will be required under the revised *FRE* to go through full ethical review when actually the potential to inflict extensive harm or suffering on respondents/researchers really is minimal for much research in the social sciences. A balance therefore needs to be struck in governance and ethical review between flexibility and regulation (Reed 2007, Wiles *et al.* 2007).

4.2 Instead of this constantly monitoring, sanitising and bureaucratising research, we need to go back to the basics. We need to ask, what are the aims of social research and what are its many benefits? Sadly, amid the all-consuming obsession with ethics and respondent safety, we have forgotten that research can have many benefits to respondents. People often enjoy being interviewed, questioned about their experiences and do not feel that research is an impingement on their liberty, dignity and well-being. Social research can be and often is a very positive experience for many people - respondents and researchers alike. Sadly, this aspect is totally absent in the discourse on research ethics. I am not suggesting that we forget ethics. In fact, I am suggesting that we do the reverse, that we actually think in a more detailed and nuanced way about what ethics is and how it applies to particular disciplines and in particular research contexts. We need to focus on how to carry out ethically-sensitive research without crippling research innovation and practice with bureaucratic, standardized, and inappropriate monitoring procedures. Above all, we need to actively resist ethics creep or we may as well give up on the idea of researching the experiences of others altogether.

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