Government Social Research

GSR Professional Guidance

Ethical Assurance for Social and Behavioural Research in Government

Version Information

Version number	Comment	Date
1	Initial version	Sep 2011
2	Reviewed and updated - additional principle added plus other updates	May 2021
3	Correction to principle 6 wording in appendix B and C	June 2021

Contents

Foreword

Welcome to the revised edition of the Government Social Research Ethics Guidance. Government Social Researchers generate and provide social and behavioural research and advice. This enables government to understand systems, processes and change associated with people, groups, organisations and society (their attitudes, perceptions, behaviours and intentions), and support policy debate and decision-making through a variety of approaches. Ensuring any social and behavioural research conducted on behalf of the government is done so in an ethical manner is of paramount importance.

This document outlines expected standards and responsibilities of any individual who designs and conducts social and behavioural research for or on behalf of government. These are outlined in the six ethical principles that anyone commissioning or conducting social research for government need to abide by. This guidance applies to all GSR members and anyone else conducting social research for government. The six ethical principles cover the following areas:

1. Clear and defined public benefit
2. Sound application, conduct and interpretation
3. Data protection regulations
4. Specific and informed consent
5. Enabling participation
6. Minimising personal and social harm

This guidance should be used alongside any other relevant ethical standards researchers and research commissioners align to, due to other professional accreditation (e.g. British Psychological Society, Health & Care Professions Council) and ethical standards used by research agencies and academics.

Individual departments are expected to uphold the principles as outlined in this document. Precise arrangements for this lie with department GSR Heads of Profession (HoPs). HoPs may wish to assign responsibility to a named individual(s) or nominated post(s).

This guidance can be found on the GSR members site and Gov.uk.

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1. Introduction and Summary

1.1.   Anyone conducting or commissioning social research for government has the responsibility to consider ethical issues, principles and potential risks arising throughout the lifecycle of a research project, including for any secondary data analysis.

1.2.   This ethical assurance guidance has been updated and supersedes the first published by the Government Social Research Unit in 2011. The guidance aims to:

- **Summarise the main principles** which those commissioning or conducting social research for government need to uphold, whether they are members of the Government Social Research (GSR) service or not (see Section 2).

- **Set out the responsibilities of departments** in developing ethical research governance procedures for use in central government (see Section 3).

- **Clarify the future role for the Government Economic and Social Research Team** (GESR) in maintaining appropriate ethical standards (see Section 4).

1.3.   All staff commissioning or conducting social research for government have a responsibility to uphold six ethical principles:

- **Principle 1**: Research should have a clear user need and public benefit

- **Principle 2**: Research should be based on sound research methods and protect against bias in the interpretation of findings

- **Principle 3**: Research should adhere to data protection regulations and the secure handling of personal data

- **Principle 4**: Participation in research should be based on specific and informed consent

- **Principle 5**: Research should enable participation of the groups it seeks to represent

- **Principle 6**: Research should be conducted in a manner that minimises personal and social harm

Responsibilities of departments

1.4.   It is the responsibility of individual government departments to put in place suitable systems and processes to ensure appropriate ethical standards are met. They have a responsibility to ensure that for all types of social research projects:

- **Appropriate systems are in place** which asses appropriateness of research methods; ability and capacity of contractors to undertake the research to appropriate quality standards; anticipated risks to researchers and participants at the outset of the project; and unanticipated ethical problems which emerge during the project. Systems should be regularly reviewed to ensure they are fit for purpose.

- **The importance of good ethical practice is set out** in departmental skills/competency frameworks, and staff training/development needs are met so that they can implement their ethical responsibilities.

- **Appropriate management and quality assurance arrangements are in place** for ensuring these ethical principles are upheld and any complaints for both internal and external research projects are monitored and responded to.

1.5.   It is the responsibility of anyone conducting or managing social research for government to ensure they are aware of any local (departmental) protocols on how to put these ethical principles into practice. Those conducting research (including secondary analysis) must also ensure they comply with the department's arrangements for project management and quality assurance.

Support from the Government Economic and Social Research Team (GESR)

1.6.   The Government Economic and Social Research Team (GESR) will provide the following to support individuals undertaking or commissioning government funded research and to support departments in meeting their ethical obligations:

- Keeping the guidance under review annually via a GSR Cross-Government Ethics Community of Practice group (CGECoP).
- Updating the GSR Profession Board with changes to the guidance and feeding back any ethical developments from departments via GSR Heads of Profession.
- Encouraging members to share best practice and promote consistency via the GSR CGECoP and GSR newsletter.
- Ensure the GSR skill set (GSR Technical Framework) incorporates the identification, recognition and implementation of high ethical standards.
- Facilitate access to training around ethical standards where possible.

Existing legislation and guidance

1.7.   The guidance is informed by the most recent body of knowledge from the UK Statistics Authority's Data Ethics Principles and Framework; the Economic and Social Research Council (ESRC)'s Research Ethics Framework; the Social Research Association (SRA)'s Ethical Guidelines; the Market Research Society (MRS)'s Code of Conduct and the EU-funded PRO-RES ethical framework project.

1.8.   Considerations have been made for legal duties under the GDPR 2016 and the Data Protection Act 2018, as well as specific guidance on how this should be interpreted from the Information Commissioners Office (ICO).

1.9.   See Appendix A for links to these external sources alongside other sources of ethical guidance and relevant information.

1.10.   When considering ethical implications of social research, due consideration should be given to the Public Sector Equality Duty (PSED) 2011 which sets out to address inequality across public services.[1] Research needs to be designed and managed according to the PSED, namely: (a) to eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010; (b) to advance the equality of opportunity between persons who share a relevant protected characteristic[2] and persons who do not share it; (c) to foster good relations between persons who share a relevant protected characteristic and

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[1] Ministry of Justice (2021) Public sector equality duty
[2] Gov.uk (2021) Types of discrimination ('protected characteristics')

persons who do not share it. Where relevant, references to the PSED have been made throughout the six ethical principles within this guidance.

2. Ethical Principles

2.1.   This section sets out six ethical principles which those commissioning or conducting research for government need to uphold, whether members of the GSR profession or not.

Principle 1: Research should have a clear user need and public benefit

2.2.   Social research conducted for government should aim to meet a clearly defined, legitimate and unmet need to inform the conduct of government business and serve the public good. Social research can help to meet a range of public sector user needs, from providing evidence to inform policy and decision-making, to running and improving government services and ensuring people have a voice in policy-making that affects them.

2.3.   Identifying a clear need as early as possible in the research design process, by conducting both internal and external engagement with relevant stakeholders, is a fundamental part of making sure that research will provide outputs which are of value. As discussed later under Principle 5, engaging with stakeholders and groups the research seeks to represent, not only helps to ensure the effective dissemination and impact of research findings, but also is an important step in determining the most appropriate and effective research methods.

2.4.   As well as considering the user need, it is important to consider the timing of the research, and whether this could affect the public acceptability or public benefit of conducting the research. Events in the wider political or policy landscape, both in the UK and internationally, such as the recent COIVD-19 pandemic, may affect the intended public benefit of doing the research. When conducting research that may potentially be contentious due to the topic, timing or proposed methods, it can be worthwhile to assess the public acceptability of the research by conducting public engagement work before proceeding with the research. It may also be beneficial to consult with the Head of Profession, or wider analytical community to ensure adherence to the latest advice or guidance.

Public Benefit

2.5.   Defining the public good or benefit of both primary research and secondary uses of data requires consideration of benefits beyond just producing the statistics or research outputs. Researchers should be able to describe how those statistics or outputs will lead to public benefit, as well as who the benefits may apply to. The Research Code of Practice and Accreditation Criteria[3] provides a useful list of examples regarding what it means to conduct research that is in the public interest or serves the public good. This includes research whose primary purpose is to:

- provide an evidence base for public policy decision-making

- provide an evidence base for public service delivery

- provide an evidence base for decisions which are likely to significantly benefit the economy, society or quality of life of people in the UK, UK nationals or people born in the UK now living abroad

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[3] UK Statistics Authority (2021) Research Code of Practice and Accreditation Criteria

- replicate, validate, challenge or review existing research and proposed research publications, including official statistics

- significantly extend understanding of social or economic trends or events by improving knowledge or challenging widely accepted analyses

- improve the quality, coverage or presentation of existing research

2.6.   When assessing the public good of social research, it is important to consider the following questions:

- How beneficial would the research be to society as a whole? Could the research disproportionately benefit or disadvantage a particular group?

- Is it necessary to conduct this research to realise the public benefits? Is this the best and most cost-effective way of answering the research questions?

- Have the potential benefits been weighed up carefully against potential harms to individuals and communities (for both those involved and not involved in the research)?

- Would there be any negative consequences if this research was not conducted? Could it be unethical not to conduct the research?

Transparency and Dissemination

2.7.   The evidence from government-funded social research should be brought to the attention of policy makers and other users in a clear and accessible way. It should also conform to professional and ethical standards to protect against distortion and bias in the interpretation of findings.

2.8.   Ensuring the transparent dissemination of research methods and findings maximises the potential public benefit of social research, by enabling the research findings to reach wider audiences. It is also an essential part in maintaining public trust in collection and use of public data. Transparency around research methods as well as research findings also enables research to be subject to scientific scrutiny and evaluation, as well as promoting the sharing of best practice throughout the research community.

2.9.   It is therefore important to have a clear dissemination strategy in place before starting any research project. Where appropriate consult the GSR Publication Protocol[4], and consider the following questions:

- Where, when and how will the research findings be disseminated publicly?

- Do plans for dissemination ensure that findings will be accessible to relevant different audiences (including participants) in a timely manner?

- Will evidence from the research be brought to the attention of relevant stakeholders (both internally and externally) as well as senior officials, if appropriate?

- What steps will be taken to ensure that research outputs are interpreted appropriately and without bias?

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[4] GSR (2015) Publication Protocol

2.10. There may be instances where it is not possible to openly publish research findings in a timely manner (for example, during pre-election periods, during negotiations with other countries, when there is a risk to national security, or when there is a requirement for confidentiality of sensitive policy development within government). In such instances, it is important to ensure that research findings are published when it is possible to do so, and that any decisions and reasons for not publishing are clear and proportionate. For further guidance on the use and dissemination of evaluation findings refer to Chapter 6 of the Magenta Book.[5]

Principle 2: Research should be based on sound research methods and protect against bias in the interpretation of findings

2.11. Social research conducted by or for government should be based on sound research methods that are appropriate to the research question and carried out to the highest quality standards.

2.12. When considering the most appropriate methods to use it is important to consider which methods will enable the research question to be fully and thoroughly answered, and whether different methods entail any additional risks (such as increased research participant burden). Methods should only be chosen where any additional risks are significantly outweighed by the potential benefits of using a particular method.

2.13. It is also important when considering the most appropriate method to be aware of the wider environment. This includes designing and conducting research in a way that is sensitive to cultural, socio-economic, environmental and political contexts, as well as being aware of how external events can impact on social research, in particular the conduct of fieldwork. For example, the wider implications of the COVID-19 pandemic led to remote/virtual research methods often being necessary where face-to-face methods would have been used before.[6]

2.14. Researchers should be able to justify the need for working directly with groups of interest in favour of utilising alternative existing sources of data. In instances where direct participation is deemed necessary, the research team need to ensure research participant rights and dignity are respected and there is equitable participation.

2.15. All social research and use of findings should adhere to the Civil Service core values of Honesty, Integrity, Impartiality and Objectivity.[7] As stated in Principle 1 researchers should conform to professional and ethical standards to protect against distortion and bias in the interpretation of findings. The findings and evidence presented should also adhere to departmental and government quality assurance guidance. More information on producing quality analysis for government can be found in the HMG Aqua Book.[8]

2.16. Researchers should ensure they are aware of and adhere to all relevant government or departmental legislation and policies when planning what research methods they will use before beginning a research project. They should seek legal advice or guidance if there is any uncertainty.

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[5] HM Treasury (2021) The Magenta Book
[6] Market Research Society (2021) Post-Covid-19 Lockdown Guidance: Undertaking safe face to face data collection
[7] Civil Service (2015) The Civil Service Code
[8] HM Treasury (2015) The Aqua Book

2.17.   They should also consider what methods are used when conducting research with participants from certain groups. For example, when working with particular groups researchers may have to consider the Mental Capacity Act 2005[9], or when using freely available social media data (see Appendix B) there may be specific departmental policies in place. The research methods chosen should be inclusive and enable all appropriate persons to take part in accordance with the PSED 2011. Analysis should take potential differences between groups into consideration and findings should be presented as such.

Principle 3: Research should adhere to data protection regulations and the secure handling of personal data

2.18.   While there are clear similarities between GDPR and ethical principles in social research it is important to note that something that is GDPR compliant will not be ethical by default. Therefore, social researchers must consider ethics in addition to the GDPR.

2.19.   Personal data is any information that relates to an identified or identifiable individual.[10] It must be collected and processed in line with the GDPR 2016 and the Data Protection Act 2018. The following table presents a summary of the core requirements - the 'principles' - set out by the GDPR, and an overview of how these should be implemented in social research practice. For more detailed information, please visit the ICO's website.[11]

Summary of the GDPR seven key principles to processing personal data for research purposes

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Principle A: Lawfulness, fairness and transparency

- There must be a lawful basis for collecting and using personal data. The ICO have an interactive tool to help document which of the six lawful bases is most appropriate for a project.[12]

- The collection and use of personal data should not have adverse effects on individuals and be handled in a way they would reasonably expect.

- Researchers should be clear, open and honest about how personal data will be used in a way that is easily accessible and easy to understand - as well as being a legal requirement, this is good ethical practice for ensuring informed consent.

Principle B: Purpose limitation

- Researchers should specify why they are collecting personal data to comply with accountability obligations and ensure transparency.

- Privacy notices should be provided when collecting personal data to ensure that participants understand why their personal data is being collected, what will be done with it and who it will be shared with.

- Research findings must not be used for purposes other than those they were collected for. New consent should be sought from the research participants for the new purpose.

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[9] NHS Health Research Authority (2021) Mental Capacity Act
[10] Information Commissioner's Office (2021) What is personal data?
[11] Information Commissioner's Office (2021) Guide to GDPR
[12] Information Commissioner's Office (2021) Lawful basis interactive guidance tool

Principle C: Data minimisation

- Personal data should be relevant to the research and limited to what is necessary for the purpose of the research.

Principle D: Accuracy

- Researchers should take reasonable steps to ensure personal data is recorded correctly and where necessary the data should be updated periodically. The source and status of the personal data must be clear and any challenges to its accuracy should be carefully considered and incorrect data rectified. It is good practice to keep a note of these.

Principle E: Storage limitation

- Personal data should only be kept for as long as it is needed and if no longer needed should be deleted securely.

- The length of storage should be justified, and research participants made aware of the intended retention period. Where available, researchers should refer to individual departments' data retention policies.

Principle F: Integrity and confidentiality

- Personal data should be processed and stored securely. Researchers should analyse the risks associated with data processing and put in place the appropriate level of security to prevent the data being compromised (this may include pseudonymising and/or encrypting data).

- It should be made clear to research participants what measures will be taken to ensure confidentiality.

Principle G: Accountability

- Researchers must take responsibility for what they do with personal data and must have appropriate records in place to demonstrate compliance with the above principles.

2.20. The ICO encourages the anonymisation of data wherever possible. Care should be taken to ensure data is truly anonymous under the GDPR. If individuals could be re-identified through any reasonably available means, the data is only pseudonymised and the researcher is continuing to process personal data. In those instances, researchers should consider whether the data can be made anonymous.

2.21. Where anonymous data is to be used for secondary data analysis, particular care must be taken to ensure it retains the anonymity of respondents. Special care should be taken with small or very localised samples, and with the rich data generated by qualitative research, which may enable research participants to be identified from their characteristics alone.

2.22. The identity of all research participants and potential participants (including information about the decision to participate) should be protected throughout the research process. For example, by ensuring that participants are not identified or identifiable in the research outputs. Clear and transparent procedures should be developed to protect the identities of any research participants. Names and addresses should only be collected if pertinent to the research in question and should be kept securely and separately from responses to minimise the likelihood of breaches of security and anonymity.[13] Suspected data breaches must be

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[13] Note, researchers should be alive to the risks of including full postcodes with survey data, as this can have the effect of identifying individuals or households in sparsely populated areas.

reported in accordance with ICO guidance.[14] In the case of a breach refer to departmental policies where possible.

2.23.   Information relating to a deceased person does not legally constitute personal data and is not subject to GDPR. However, researchers should consider ethical issues around the disclosure of, or access to the deceased person's data, such as collecting and processing the personal data of relatives.

Principle 4: Participation in research should be based on specific and informed consent

2.24.   Participation in research is always voluntary, unless the law requires it, as with the census. Research participants should provide their specific and informed consent based on accurate information outlining what it means for them to take part.

2.25.   Consent can be considered a legal basis for processing personal data, as set out in the GDPR. The ICO sets out the requirements needed for obtaining explicit consent from research participants.[15] This includes ensuring consent is being given freely, the ability for research participants to refuse consent without detriment and be able to withdraw consent easily at any time. If researchers are not using consent as a legal basis, it is still important to consider the points raised here so research participants can make an informed decision about taking part.

Checklist for achieving valid consent

To achieve valid consent, the information required for research participants to make an informed decision must be prominent, concise, in plain language, and separate from any other terms and conditions. If appropriate it should be provided in different languages, Braille or audio recorded. The information provided to participants should include:

- A summary of what the research is about and what it is being used to inform

- Details on who is conducting the research and the organisation it is for

- That they have the option to refuse to answer any individual questions without explanation

- That they can withdraw from the research at any point up to a specified date (usually dictated by data analysis and reporting), who to contact and how to contact them if they choose to withdraw at a later date

- Whether or not they will be identified in reporting

- How their data and responses will be processed, stored or shared with any other organisations

- Whether any audio or visual recording equipment will be used

- Whether expenses are covered (travel, subsistence, accommodation) and if an incentive is offered

2.26.   The consent process must start with giving research participants information about the research, the opportunity to reflect on this and ask any questions. The researcher should obtain explicit consent through reiterating the terms of the

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[14] Information Commissioner's Office (2021) Report a breach
[15] Information Commissioner's Office (2021) Consent

research, which the research participant must agree to before taking part. It is important to remember that consent must be sought from participants each time they take part in research, for example in separate waves of a longitudinal study or if they are being re-interviewed as part of another separate piece of research.

2.27. Consent should be captured in a consent form which is separate to any other research documentation. This should include details of who consented and what they consented to, including any audio or visual recordings. Consent can be sought either in person or remotely and must be time and date recorded. Consent forms should be saved and stored securely to ensure a clear audit trail.

2.28. Covert research, where participants are unaware of their involvement in a study raises ethical and legal concerns and should be approached very carefully. Where covert research is planned it must be subjected to rigorous independent ethical review[16], and legal advice should be sought before it is conducted.

Consent via gatekeepers or proxy, including with children

2.29. Where possible, research participants should be approached directly for consent. The ICO states it can be assumed that adults have the capacity to consent unless there is reason to believe the contrary.[17] Where researchers believe someone lacks the capacity to understand the consequences of taking part and cannot give informed consent, a third party with a legal right to make decisions on their behalf can provide consent to participate, as specified by the Mental Capacity Act 2005, see Principle 2. When negotiating consent via gatekeepers or proxies, reasonable care should be taken to safeguard the relationship between gatekeeper/proxy and participant and to protect the research participant's privacy. See Principle 6 for more information on how to consider additional needs when working with specific groups.

2.30. In most organisations and for government sponsored research involving children aged under-16, their parents or legal guardians must be approached for consent to enable children under-16 to participate in research. In addition to parental consent, reasonable efforts must be made to inform children under-16 about the purpose of the research and seek their consent to participate as well. Children under the age of 16 should also be accompanied during participation. The ICO provides specific guidance on collection of information from children.[18]

2.31. Children who are 16 or over will usually be able to give their own consent but researchers should consider whether it is appropriate for parents, legal guardians or other gatekeepers (like schools) to be informed when their child has been invited to participate in research.[19]

Secondary Research

2.32. Secondary data analysis, including research synthesis, must be conducted in a way that is consistent with the original consent provided by participants, based on the information given at the time, for example in privacy notices or information

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[16] Note, in some instances independent ethical review may not be needed if there has been a rigorous assessment of risks and these are not felt to be high for example if no personal data being collected.
[17] Information Commissioner's Office (2021) What is valid consent?
[18] Information Commissioner's Office (2021) Children
[19] Economic and Social Research Council (2021) Research with Children and Young People

sheets. Any changes to the way data are used may require additional consent from research participants.

Incentives

2.33.   There is separate GSR guidance on the role of incentives within social research activities (see GSR members site); this sits alongside individual departmental policies and guidance and should be read in combination. The use, or not, of incentives should be part of the overall strategy of any social research process with a focus on improving quality of responses – they are not a default option. Incentives should not be offered if they could encourage research participants to take risks that they otherwise would not have taken. The ESRC has published some general guidance around the use of incentives.[20]

2.34.   Incentives are often used to encourage participation in research and can be in the form of cash, shopping vouchers, or charitable donations made on the research participant's behalf. Those responsible for conducting or commissioning research on behalf of government need to satisfy themselves that offering incentives, including the amount and type, is appropriate.

2.35.   It is important to note that accepting the incentive should not prevent the research participant from withdrawing consent at a later stage.

Principle 5: Research should enable participation of the groups it seeks to represent

2.36.   Robust and meaningful research must engage the groups it seeks to represent. Therefore, enabling participation of these groups must be an integral part of its design and considered at the start.

2.37.   Reaching and recruiting participants from a range of backgrounds and identities ensures the research can meaningfully and accurately include the views of those who will be impacted by the policies the research will inform. This includes the consideration of protected characteristics such as ethnicity, gender, sex, and sexual orientation amongst others. In line with the PSED (see Principle 2 for more information), researchers should identify potential barriers to participation and take measures to facilitate participation where practical.

Possible measures for enabling participation

> • **User involvement -** co-production or consulting with stakeholders when designing research helps to ensure that research is relevant and necessary. Consulting with hard-to-reach groups and/or their representatives on research design can ensure that possible barriers to participation are identified and minimised.
>
> • **Recruitment and sampling -** consider how the design of these will ensure fair representation. Care should be taken where methods such as snowball sampling are employed; this might be the only way to access harder to reach groups, but may introduce challenges around excluding, rather than enabling, participation. It is also important to consider the implications of excluding sparsely populated areas in highly clustered sample designs and considering the case for oversampling under-represented or hard-to-reach groups.
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> • **Ensuring information, venues and formats for meetings are accessible to all** - for example, providing access to translators or translated materials where required, ensuring

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[20] Economic and Social Research Council (2021) Voluntary participation and coercion

locations are safe and private for all participants, providing induction loops for those with hearing impairment or guides for the visually impaired, and offering meetings/sessions at different times of the day.

- **Methods of data collection** - for example, offering a choice between self-completion and interviewer-assisted interviewing where respondents may have difficulty reading or comprehending written material, or where the content of the research is particularly sensitive or may be triggering. Or a choice between online or paper completion for those without access to the technology or internet.

- **Assistance with costs incurred in research participation** - for example, to help with childcare whilst participating in the research, or transport costs to and from research venues.

Principle 6: Research should be conducted in a manner that minimises personal and social harm

2.38.   Researchers have a responsibility to consider any possible harmful consequences of research processes and outcomes. They must ensure these consequences are identified, assessed, and minimised at all stages of the research and for all groups involved in the research, including for:

- The research participants actively taking part

- Organisations to which the research participants belong

- Any wider social groups with an interest in the research topic

- The researchers themselves

- Individuals who choose to opt out of the research[21]

2.39.   Harm is defined as any threat, or potential threat, to physical, social and psychological well-being. This may include injury, illness, feelings of distress or fear as well as the disclosure of sensitive or embarrassing information without care.

2.40.   An objective assessment of potential personal or social harms should be included in any research proposal or strategy. This is necessary to ensure minimisation of harm to participating individuals, groups and researchers (see Section 3 for more detail on Departmental arrangements for assessing risk). Assessments of harm should, where relevant, include:

- Procedures for dealing with disclosures of abuse, self-harm or suicidal ideation

- The means of protecting participants and researchers from undue stress loss of self-esteem, or psychological injury

- Procedures for assessing interview sites, recruitment methods and whether potential participants are under the influence of alcohol or drugs at the time of interview

- Consideration of whether the harm of not conducting the research is greater than carrying it out

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[21] Note, Individuals who choose to opt out of the research may have done so because the topic is particularly sensitive or distressing for them. It is therefore important that everyone invited to take part in the research is provided with the same support/information regardless of whether they choose to take part in the research.

2.41. All departments should have their own safeguarding policies and/or procedures in place that researchers are aware of and adhere to. These should empower researchers to be able to make their own decisions on how to deal with any of the issues listed above if they arise.

2.42. Although not a prescriptive or exhaustive list, topics, participant groups or methods that might be considered high risk are outlined below. In practice, it is often the context of the research or a combination of factors that results in a project being judged as presenting 'more than minimal risk'.

Examples of topics, methods of participant groups that may elevate levels of risk

Sensitive topics

- Illegal behaviour and contact with the criminal justice system.

- Experience of violence, abuse or exploitation.

- Health (including behaviours detrimental to health, addictions, mental health, loneliness, pregnancy, death, sexual behaviour, ageing, cognitive impairment, genetics).

- Income, unemployment, debt and benefit receipt.

- Children and family life circumstances.

- Declarations of suicidal ideation and self-harm.

- Confidential business activities or interests.

Participant groups

- Vulnerable participant groups – including children and young people, vulnerable older people, those with a learning disability or cognitive impairment, individuals in a dependent or unequal relationship.

- Groups accessed via gatekeepers – including ethnic or cultural groups, especially where English is not the first language.

Research methods

- Covert research where it is not proposed to seek full and informed consent at the outset, and/or participant observation.

- Accessing/combining/linking data from multiple sources – especially where this involves personal or confidential information of identifiable individuals.

- Intrusive interventions – including the collection of biological samples (see Section 3 for the UK Framework for Health and Social Care Research).

- Use of 'practitioner' researchers.

Avoid unnecessarily or inappropriately intrusive methods

2.43. Research should not be inappropriately intrusive (in terms of method, relevance of the questions asked, or time commitment), raise false hopes, adversely affect the reputation of the participant in their social group or organisation, or cause avoidable anxiety or distress.

2.44. The research process should also not involve unwarranted material gain or loss for any participant.

2.45. For primary research, these harms can be minimised by making adjustments such as avoiding long interviews or surveys and adapting them based on participant

needs, for example including breaks or extending the time given for complex tasks. The privacy of participants should be respected, particularly if undertaking observational studies, see [Principle 2](#) for more information on choosing the most appropriate method.

Consider any additional needs when working with specific groups

2.46.   Special care should be taken to protect the interests of vulnerable participants (including children, elderly and other vulnerable groups).[22] Plans for primary research with vulnerable groups, or those with a high risk of distress, should ensure that:

-   The research is clearly needed and cannot be obtained by other means

-   Post-interview support for respondents and interviewers is provided

-   The impact of the research on non-participating members of the target group is considered

2.47.   Researchers should consider engaging with relevant stakeholders (such as support groups or charities) who will have greater experience and awareness of the potential harms that may arise from vulnerable groups taking part. Engaging with these groups when planning such research can help to ensure that all potential risks are understood and mitigated as much as possible at the design phase.

2.48.   The impact of research on wider social groups and organisations to which individuals belong should also be considered and the research design adapted to minimise harm. This can involve consideration of the local political/social/cultural context in which research takes place, for example:

-   Where meeting with a UK government official would be considered as disloyalty to a group and result in exclusion or harm

-   Where the research topic is particularly sensitive or contentious due to the cultural or social values/norms of the target populations

-   Where the timing of the research could be harmful, such as during the COVID-19 pandemic or immediately after a traumatic incident

Consider harm around secondary uses of data

2.49.   Minimising risk of personal and social harm also applies to analysis of secondary data sources. It is a legal requirement under the GDPR to minimise risk of harm when processing data. The ICO guidance on completing Data Protection Impact Assessments (DPIA) can be used to help identify and minimise the data protection risks of a project[23]. These harms can be further minimised by:

-   Ensuring confidentiality agreements are made and maintained

-   Informing participants of how their data will be used either at the point of collection or once a decision to use this data in research has been made

-   Reporting research sensitively and transparently including clear information on methodological decisions and where these may impact inclusion or exclusion of particular groups

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[22] Economic and Social Research Council (2021) [Research with potentially vulnerable people](#)
[23] Information Commissioners Office (2021) [Data protection impact assessments](#)

- Ensuring that research methodology design and outputs have been through the appropriate level of quality assurance
- Carefully considering the reporting of findings including the potential for disclosure, and harmful impacts on any reader

Consider the research team

2.50. Alongside the wellbeing of research participants, the physical, social and psychological wellbeing of researchers and those producing the research or analysis should be protected. This includes taking account of risks that arise from research environments, the data collection process and the content of the research or analysis. The research team should:

- Have the appropriate knowledge and training to carry out robust and ethical research
- Have access to effective channels to raise concerns about the research or ask for support
- Be aware of disclosure protocols regarding potential harm/abuse
- Undertake appropriate employment checks, including those conducted by the Disclosure and Barring Service (DBS), especially where research involves vulnerable respondents or sensitive data, relevant checks must be undertaken where research involves children
- Consider any potential personal affiliation with the subject of the research that could cause emotional harm or vicarious trauma
- Report sensitive subjects in an appropriate way to ensure the wellbeing of readers and audience.

2.51. Note that these considerations can also apply to research facilitators, including interpreters, project managers, and peer reviewers.

3. Departmental governance arrangements

3.1. In addition to adhering to the six ethical principles set out in this guidance, this section outlines individual and departmental responsibilities and provides guidance on some of the important factors to consider which ensures effective departmental governance arrangements are in place.

Departmental responsibilities

3.2. All government departments have a responsibility to ensure that their project management and quality assurance arrangements enable individuals commissioning or undertaking social research to uphold the highest ethical standards. Departments must be able to satisfy themselves, their ministers or senior officials, the external research community, and the public that appropriate systems are in place for assessing:

- The appropriateness of proposed research methods, and the quality of research execution, analysis and reporting throughout the life of a project
- The anticipated risk to researchers, participants, the wider community at the outset of the project
- Unanticipated ethical problems which emerge during, and after publication of, the project

Departments must also:

- Regularly review or audit the systems and protocols in place to ensure they continue to be fit for purpose
- Set out the expected competencies for each grade in relation to the GSR ethical principles and identifying training/development needs for individual staff to ensure they meet these competencies[24]
- Ensure in-house research is appropriately scrutinised in line with local (departmental) quality assurance processes, to ensure the GSR ethical principles are upheld and that complaints for both internal and external social research projects are monitored and responded to

Individuals' responsibilities

3.3. Individual staff responsible for conducting or managing social research for government must ensure they are aware of their ethical responsibilities, and of any local (departmental) protocols on how to put these into practice.

3.4. Research project managers in departments should confirm that all their stakeholders, including policy customers, are aware of ethical issues likely to arise during a project, and the proposed means of managing these.

3.5. It is for departments to decide how they wish to develop or refine management arrangements to meet these needs, and lines of accountability should be clear. Frequently, the point of accountability will be the departmental Head of Profession

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[24] Government Social Research (2019) Technical Framework

for GSR in consultation with the departmental Head of Profession for the Government Statistical Service or an ethics advisory group/panel.

Contractors' responsibilities

3.6. Those commissioning research need to ensure that the potential ethical issues presented by a project are assessed at the outset and monitored throughout. They must ensure appropriate arrangements for ethical scrutiny are in place, and that the organisation undertaking the research has appropriate arrangements in place to ensure the day-to-day management of these risks. Adherence to GSR standards of ethics should be noted in agreements with suppliers contracted to support research work. Contravention of these standards could result in termination of work. Those conducting research (including secondary analysis) must additionally ensure they comply with the department's arrangements for management, quality assurance, the PSED and GDPR.

Assessing and Managing Risk

3.7. All social research projects conducted for government, whether internal or external, must be subject to an ethical risk assessment at the earliest possible stage of project development.

3.8. The following points outline the key steps that should be taken when conducting an ethical risk assessment for all social research projects:

- Produce a written record of the potential risks and harms and how they will be mitigated.

- Seek independent scrutiny of the risk assessment and proposed arrangements for managing these from a research professional outside of the immediate research team.

- Seek independent ethical advice where risks cannot be fully mitigated. Where research projects are deemed to be high risk, or where identified risks cannot be fully mitigated, researchers should seek independent ethical advice or approval from an external ethics committee or advisory board.

- Monitoring and continuing ethical review throughout the research process regardless of the level of anticipated risk or type of ethical review process, especially when any changes are made to research projects.

3.9. At the risk assessment stage, departments may wish to classify projects according to their level of anticipated harm (for example emotional, physical, and psychological) or the risk to researchers and participants and wider communities or organisations. Tools such as the GSR Ethics Checklist (see Appendix C), the UKSA Ethics Self-Assessment and the PRO-RES framework (see links in Appendix A) may be used to help. Where potential harm or risk is identified, there should be clear plans in place to ensure they are mitigated as much as possible.

3.10. If at any point throughout the research process a project is identified as having 'more than minimal risk', or risks that cannot be fully mitigated, then research proposals should be subject to a formal ethical review. It is the responsibility of individual government departments to ensure that they have clear processes in place to enable this, and all ethical reviews and subsequent decision-making should be clearly documented.

3.11.   Different government departments will have their own arrangements for ensuring the formal review of research projects, but the following points highlight potential avenues for independent ethical review:

  • Seek independent and impartial scrutiny from experts (for example from the external research community or from a member of GSR from another department) - several departments arrange for proposals to be peer reviewed as part of the commissioning process. Seek advice from the GSR Cross-Government Ethics Community of Practice (CGECoP) group

  • Seek advice from external ethical advisory groups, such as The National Statistician's Data Ethics Advisory Committee who can provide independent expert advice to research projects collecting or using public data to produce research outputs or statistics.[25]

3.12.   Proposals that represent 'more than minimal risk' may include those that by virtue of the topic, vulnerability of the potential participants, or proposed methods, or a combination of these, present a greater challenge in upholding the stated ethical principles. These projects require greater vigilance with respect to ethical issues throughout their lifespan. In departments where a high proportion of research is likely to be ethically sensitive by virtue of subject matter or client group, departments need to identify appropriate ways of managing this higher level of risk. For example by developing more detailed protocols to support project managers in assessing and managing the potential risks of harm raised by the subject matter (for example crime or immigration at the Home Office) or client group (for example vulnerable older people or those in receipt of benefits at DWP), and ensure that staff are trained to an appropriate standard.

UK Framework for Health and Social Care Research

3.13.   When embarking on new research, project managers must also ensure that projects (whether internal or external) falling within the remit of the UK Framework for Health and Social Care Research receive appropriate ethical scrutiny, which may involve review from an NHS Research Ethics Committee.

3.14.   Researchers should use the Health Research Authority's (HRA) decision tool[26] to decide whether their project is defined as research by the UK Policy Framework for Health and Social Care Research. If the project is defined as research, the ethical review tool[27] can be used to determine if the project requires review by an NHS Research Ethics Committee.

3.15.   Further information on the UK Framework for Health and Social Care Research can be found on the HRA's website.[28]

External projects

3.16.   Departments must ensure that appropriate arrangements are in place for any external projects being conducted on behalf of government, so that they can be subject to ethical scrutiny, either before or during a procurement process. External research should be shown to comply with existing external ethics frameworks and

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[25] UK Statistics Authority (2021) National Statistician's Data Ethics Advisory Committee
[26] NHS Health Research Authority (2021) Assessment tool to decide if your study is research
[27] NHS Health Research Authority (2021) Assessment tool for review by the NHS Research Ethics Committee
[28] NHS Health Research Authority (2021) UK Policy Framework for Health and Social Care

codes such as those mentioned in [Section 1](#), as well as these ethical principles presented in this guidance. The project manager on behalf of government should ensure this is the case and should also check whether all ethical issues identified in an initial risk assessment have been satisfactory resolved. For projects presenting more than minimal risk, departments should ensure a formal ethical review has been undertaken in accordance with the principles set out in paragraph above

Sanctions and redress

3.17. All government departments should have clear processes or policies in place that outline how they will handle any complaints related to breaches of ethical procedures or principles. Government departments should also require that contractors notify them of complaints and have specific policies and procedures to help deal with them. Details of all complaints, along with departmental responses, should be collected and reviewed regularly so appropriate remedial action can be taken where necessary.

4. The Role and Responsibility of the Government Economic and Social Research Team

4.1.   The role of GESR is to support the GSR profession across a range of areas. This includes the following responsibilities related to this guidance:

- Keeping the guidance under review via the GSR Cross-Government Ethics Community of Practice (CGECoP) group.[29]
    - o GESR will retain a presence on the group to ensure this guidance is reviewed annually.

- Updating the GSR Profession Board with changes to the guidance and feeding back any upcoming ethical developments from departments communicated via GSR HoPs.
    - o This communication may come via HoPs and/or via the GSR CGECoP.

- Encouraging members to share best practice and promote consistency via the GSR CGECoP and GSR newsletter.

- Ensure the GSR skill set (GSR Technical Framework) incorporates the identification, recognition and implementation of high ethical standards.

- Facilitate access to training around ethical standards where possible.

4.2.   The GSR CGECoP terms of reference (see GSR members site) will include an outline of how the Community of Practice works, its aims, and plan to keep the guidance updated annually. The group also provides a quarterly platform for departments across government to share ethical dilemmas, questions, and encourage discussion. The group will select one meeting a year to discuss and review the ethical guidance, identifying if any amendments or additions are required.

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[29] GSR Cross-Government Community of Practice (2021) Terms of reference (see GSR Members site)

Appendix A: Links to other sources of ethical guidance and relevant information

Alongside the links referenced throughout these six ethical principles, below is a series of links to other sources of ethical guidance and relevant information. Please note GSR and GESR is not responsible for the content of these external sites.

Links to key sources referenced in this guidance

[ESRC Ethics Webpage](#) *The ESRC framework for research ethics helps researchers to consider ethics issues during the complete lifecycle of a project and includes information and guidelines on good research conduct and governance.*

[General Data Protection Regulation, GDPR](#) (2016) *Full wording of the GDPR regulation.*

[ICO Overview of GDPR](#) (2017) *Overview highlighting the key themes of the GDPR.*

[Magenta Book](#) (April 2020) *HM Treasury guidance on what to consider when designing an evaluation.*

[Market Research Society Code of Conduct](#) (October 2019) *Professional standards that all research practitioners must maintain.*

[PRO-RES Framework for Ethical Evidence](#) (March 2021) *A project funded by the EU which provides guidance for researchers to work to the highest standards of research ethics and integrity.*

[RESPECT Project](#) (2014) *A code of practice for the conduct of socio-economic research.*

[SRA Ethics Guidance](#) (2021) *Professional standards that all social research practitioners must maintain.*

[UK Policy Framework for Health and Social Care Research](#) (May 2020) *This policy framework sets out principles of good practice in the management and conduct of health and social care research in the UK.*

[UK Statistics Authority National Statistician's Data Ethics Advisory Committee](#) *NSDEC provide independent and expert ethical advice on the collection, access, use and sharing of public data for research and statistical purposes. NSDEC will review projects from across the Government Statistical Service, and wider research community.*

[UK Statistics Authority Ethics Self-Assessment Tool and Guidance](#) (2021) *The ethics self-assessment tool and guidance provide researchers with an easy-to-use framework to consider the ethics of research projects. Further support and feedback are also available from the Data Ethics team within the UK Statistics Authority.*

[UK Statistics Authority Research Code of Practice and Accreditation Criteria](#) (February 2020) *Code of practice concerning the disclosure, processing, holding or use of personal information under the Digital Economy Act 2017.*

[UK Statistics Authority Centre for Applied Data Ethics](#) (2021) *The Centre provides a continually developing resource for the research and statistical community focused on practical data ethics guidance and support. The outputs and activities of the Centre aim to be as responsive to emerging user needs as possible and the [team](#) are keen to hear from users regarding ideas for*

further ethics [guidance](#) topics or other ethics-related support that our community would benefit from.

Specific guidance

Behavioural Insights: [OECD Behavioural insights guidance](#) (2019) *General guidance but includes a specific section on ethics in research exploring behavioural insights.*

Big Data and children: [UNICEF Children and Big Data research](#) (May 2017) *Outlining how to adapt traditional ethical standards for research involving data collecting from children to a big data, online environment.*

Criminology: [British Society of Criminology Statement of Ethics](#) (2015) *Ethics for researchers in the field of criminology.*

Data Science: [Data Ethics Framework](#) (September 2020) *Guidance for public sector organisation on how to use data appropriately and responsible when planning, implementing and evaluating a new policy or service.*

EU Framework Programme: [European Commission Ethics Guidance](#) (October 2018) *This document aims to help researchers in social sciences and humanities identify and address ethical dimensions when involved in research and innovation actions financed by the EU Framework Programme.*

Evaluation: [Evaluation Society Best Practice guidelines](#) (2019) *Guidelines for those involved in evaluations to facilitate good evaluation practice.*

Healthcare ethical standards: [Health and Care Professions Council](#) (2016) *Standards of conduct, performance and ethics for registrants.*

Lockdown Guidance: Undertaking safe face to face data collection [Market Research Society](#) (2021) *Guidance on interpreting the implications for face-to-face data collection following Covid-19 restrictions in England.*

Psychological guidance: [British Psychological Society Code of Ethics and Conduct](#) (2018) *Ethics for members of the British Psychological Society.*

Research with Children: [ESRC guidance](#) *Specific guidance on research with children and young people with further useful links in the article.*

Social Media Research: [Association of Internet Researcher Guidance](#) (2019) *Reports to assist researchers making ethical decisions in their research on and about the internet.*

Social Media Research: [University of Aberdeen and ESRC Social Media Research: A Guide to ethics](#) (2016) *A set of guidelines on the ethical use of social media data in research.*

Social Media Research: [ONS Collecting and using social media for statistics and statistical research policy](#) (2018) *The policy ONS staff must follow when collecting or using data obtained from social media platforms to produce statistics and conduct statistical research, including exploratory research.*

Social Media Research: [British Psychological Society Ethical Guidelines for Internet-Mediated Research](#) (2017) *Outlines some of the key ethics issues which researchers and research ethics committees are advised to keep in mind when considering implementing or evaluating an IMR study, as well as what special considerations may apply.*

Vulnerable participants: [ESRC guidance](#) (further useful links in the article) *Specific guidance on research with potentially vulnerable people with further useful links in the article.*

Department Specific Guidance

Ofsted: [How we carry out ethical research with people](#)

Scottish Government: [Scottish Government social research: protocols and guidance](#)

Main sources of relevant legislation

The main areas of law that are likely to be relevant to the ethical considerations are set out below. However, this list is not intended to be fully comprehensive, and legal advice should always be sought if there is any uncertainty regarding legal rights and obligations.

- [Anti-Terrorism, Crime and Security Act (2001)](#)
- [Crime and Disorder Act (1998)](#)
- [Data Protection Act (2018)](#)
- [Freedom of Information Act (2000)](#)
- [General Data Protection Regulation (2016)](#)
- [Health and Social Care Act (2012)](#)
- [Human Rights Act (1998)](#)
- [Mental Capacity Act (2005)](#)
- [Equality Act – Public Sector Equality Duty (2010)](#)

Appendix B: Social media research: ethical considerations

Social media can be defined as any web-based computer-mediated tools which exist to create, share or exchange information, ideas, pictures or videos in virtual communities and networks.[30] This includes platforms like Twitter, Facebook, Instagram, discussion forums or comments on content, for example news reports etc.

The use of social media is growing quickly. The widening of social media access through smartphones has coincided with technological progress in the Internet of Things, and notably connectivity through home appliances, cars and wearable devices. These have the potential to fundamentally change and increase the amount of data available on users through new sensors, e.g. location, microphones, cameras. The increasing connectedness of data also raises new ethical considerations, potentially increasing the distance between the point of consent and the data, which the user technically consents to be made available through APIs.

This makes social media data a rich source of information for researchers, especially if connected to other sources of data so it covers a larger portion of users' lives and opinions. However, the ethical implications of using metadata from these sources must be considered and reviewed as these social media platforms change and evolve.

Any research involving social media for or on behalf of government must be guided by the six Government Social Research ethical principles outlined in this document. Ethical considerations for research involving social media are also outlined in the Magenta Book[31] and SRA ethics guidance, as well as from a range of academic institutions and organisations. See Appendix A for a list of useful sources of information.

Some of the main ethical points of consideration for using social media data have been set out below, aligning to the six ethical principles of the GSR (full GSR Social Research Media Guidance can be found at the link). Given this is an evolving and complex area this is intended as guidance and is subject to change and development over time. It should not replace sound professional judgment or advice from relevant colleagues, e.g. ethical sponsors in each Department.

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[30] Golder. S., Ahmed. S., Norman. G., & Booth. A. (2017) Attitudes Towards the Ethics of Research Using Social Media: A Systematic Review. *Journal of Medical Internet Research.* 19(6) 1-19

[31] Note: The Magenta Book references an earlier version of this social media ethics guidance document

Principle 1: Research should have a clear user need and public benefit

- Researchers should ensure they are aware of any limitations surrounding the social media data being used. This is important to ensure the data will help generate evidence to meet a clearly defined need and provide outputs of value to stakeholders. These could include limitations around how representative the data being used is of the population of interest.

- It is important to consider that social media can be very reactive and changeable in response to wider events. Researchers should also be aware of misinformation online and the potential for bias depending on the time period the data comes from. This should be considered when assessing the appropriateness of using social media data.

- For transparency, any details of the research made publicly available should provide detail on the social media data that was used and how it was obtained for the research. It is also important to consider how you want to publish your outputs using social media data and how the individual pieces of data will be presented. There will be a trade-off between the terms and conditions of platforms, protecting anonymity whilst at the same time ensuring participants are heard. More detail is provided below at Principle 3.

- Social media user rules are subject to change and development over time, which may have methodological and ethical implications for longitudinal studies. These should be reviewed throughout the project lifecycle.

Principle 2: Research should be based on sound research methods and protect against bias in the interpretation of findings

- Methods and techniques used to analyse social media are continually evolving. It is important researchers understand the benefits and limitations of the different techniques and their appropriateness in answering the research questions. Although social media data may be readily available (and plentiful) this does not necessarily mean it is the most robust or appropriate source of data to use.

- Researchers should consider the robustness and validity of using existing social media data, particularly the impact that bots and fake profiles may have. Social media data is inherently biased as different platforms have been established for different, non-research purposes. As with other types of research, findings should be presented in accordance with departmental and government quality assurance guidance to ensure quality outputs.

- Researchers may need to make methodological decisions based on theory rather than prior practical experience. Therefore, it may be useful to consult academic literature, experts in the field or within your organisation to help advise on appropriate methods, their ethical considerations and data limitations. Consider setting up a steering or advisory group who have experience in using social media research methods, to help with the scoping and design of the research.

- As social media methods often make use of existing, publicly available data, the burden on respondents can be reduced by using this.

Principle 3: Research should adhere to data protection regulations and the secure handling of personal data

- When handling social media data for research it is important to ensure it is stored securely. Individuals can often be identified through the social media content and/or metadata stored in underlying datasets. For this reason, only necessary data should be held for the research and only for sufficient time to quality assure, publish and defend the study. Following the completion of the research the underlying data should be deleted.

- Ensuring individuals cannot be identified in any outputs using social media analysis can be complex. Aggregated findings, e.g. key word analysis, word clouds and topic clustering may provide anonymity, but presentation of original granular data (such a verbatim quotation or posted images) may not provide anonymity, even if stripped of the author field, as the content for some platforms could be searched for online.

- It may be possible to 'mask' content by paraphrasing or taking out specific information, whilst ensuring that the meaning of the text is maintained. However, while this may minimise the likelihood of content being traced back to the source, it is unlikely this will guarantee true anonymity. There is a trade-off between accurately quoting what was said and by whom but at the same time allowing for peer review and assessing whether the re-wording materially impacts the analysis/findings. It is important to consider your social media analysis methodology, for example discourse analysis uses direct quotes which would be harder to anonymise than other types of analysis such as thematic or sentiment analysis. Ethical issues can be minimised by using social media findings as a starting point for wider research in conjunction with other methods, e.g. building a picture around the level of community interest or concerns/views of a particular topic.

- If researchers wish to include verbatim content or image/video/platform content in published material, they should first check if it is possible to do this in the terms and conditions the platform users agreed to. You should seek legal advice to ensure the platform legally allows you to use it for research purposes and if a fee applies. If consent has not been provided, researchers should contact social media users to seek their consent for the content to be cited. For images there may be copyright issues that need to be considered.

- Seek departmental advice from ethical sponsors prior to contacting users to ensure research processes align with GDPR principles. You should also discuss your research proposal with your department's Data Protection Officer and outline any potential ethical issues within a Data Protection Impact Assessment (DPIA), and how you intend to address them.

Principle 4: Participation in research should be based on specific and informed consent

- The terms and conditions which users agree to when signing up to a social media platform may cover the use of their data for research purposes. Whilst this can provide a legal gateway, researchers should consider whether specific research

projects reasonably meet user expectations of the collection, analysis and use of their data.

- Researchers must consider privacy settings to understand whether data is public or private. Any research involving private content should only be conducted with explicit informed consent from the user.

- Individual informed consent is impractical for research involving large datasets. In these cases, researchers should ensure data use is in line with terms and conditions and care should be taken to protect the identity of users.

- If individual informed consent is sought, researchers should consider appropriate ways to contact users. Thought should be given to the relevant department's reputation and public trust of the government and its research operations.

- Users can post data to social media platforms and subsequently delete it. If that data has been retrieved by a researcher before deletion, it is not clear whether the user's initial consent for their data to be used remains intact. Depending on the sensitivity of the data and analysis, researchers should agree up-front how to manage this issue. For example, it may not be necessary to delete the count of a post from a time series, but it may be unethical to quote an individual post which has since been deleted.

- There may be issues with verifying if participants are children on social media, particularly where identities are changed. There may also be concerns around if children truly understand the public nature of social media. Researchers should make every effort to remove data created by children and ensure anonymity is implemented as far as is reasonably practical to mitigate against this issue.

Principle 5: Research should enable participation of the groups it seeks to represent

- Certain groups are more likely to use social media than others and significant differences can exist between social media platforms. Researchers should consider whether any groups are being inappropriately excluded given the nature of the research questions and take actions to enable participation where possible (e.g. collecting data through different platforms). On the other hand, social media may increase participation from hard-to-reach groups, for example generating more honest discussions about sensitive topics which may be harder to achieve with more traditional methods of research where an interviewer is present.

- If the research needs to reach those from a range of backgrounds, then social media may not be the most appropriate method due to the limitations around coverage.

Principle 6: Research should be conducted in a manner that minimises personal and social harm

- The risk of harm to participants involved in social media research is greatest when dealing with sensitive data or when participants' privacy is breached. Sensitive data could for example include anything that could cause reputational damage, embarrassment or prosecution. To minimise harm, it is important to ensure the anonymity of participants is protected as much as possible.

- As mentioned above for children, it can also be difficult to identify vulnerable participants in social media analysis and to know if they truly understand the public nature of social media data. In this instance it would be important to ensure anonymity has been protected as far as reasonably practical and if individual consent needs to be sought to minimise any harm from including them in the research.

- A Data Privacy Impact Assessment (DPIA) can also be used here to consider the risks of personal and social harm when using social media data from any specific groups and how this harm could be minimised.

- If it is not possible to guarantee that personal data will not be collected, the collection of unnecessary personal data should be minimised. This could include limiting the amount of information collected or stripping out personal or irrelevant data after collection.

- Social media user rules are subject to change and development over time, which may have methodological and ethical implications for longitudinal studies. These should be reviewed throughout the project lifecycle.

Appendix C: GSR Ethics checklist

Purpose of the checklist

This checklist has been designed to help users ensure that research is conducted in line with the six ethical principles of the GSR outlined in this wider guidance. It is recommended that the checklist be completed as part of the research or project design process and should be referred to and updated, throughout the research management process. A separate copy can be found on Gov.uk and the GSR members site.

This checklist is an example and is not intended to provide a fully comprehensive list of factors/issues to consider for all potential projects, nor does it replace any existing processes in place in individual government departments. Researchers may wish to add additional items to this checklist, so it is tailored to their project or for research more generally within a department. Researchers should refer to the relevant principle or section in the main GSR ethical guidance if they require further information or guidance.

It is important to note that it is the responsibility of those managing or conducting social research to uphold the six GSR ethical principles and put systems in place to manage the ethical issues that are identified whilst completing the checklist. This may include: adjusting the research design or timing; seeking additional advice from relevant stakeholder groups; setting up an Ethical Advisory Group to which identified ethical issues can be escalated at the start and throughout the research; obtaining sign-off/approval for ethically sensitive projects; or, not going ahead with the research if the risks are deemed too high, cannot be sufficiently mitigated and outweigh the potential public benefit.

Using the checklist to assess ethical sensitivity

The checklist is structured under the six principles of the GSR ethical guidance. For each component of the principle, example questions have been provided to highlight what issues could be considered. For each of the sections you should describe in as much detail as possible the relevant considerations, along with the appropriate action that will be taken to manage and mitigate all the potential issues/risks identified.

The checklist requires you to make a judgement about the level of sensitivity for each issue that is identified. This should take into account the inherent sensitivity of the issue itself and the steps that can be taken to manage the issue appropriately.

A guide to the sensitivity ratings is as follows:

- **Red** – Highly Sensitive: The issue will need to be closely monitored and managed with remedial action likely to evolve throughout the project.
- **Amber** – Moderately Sensitive: The issue will require to be managed throughout the project, but initial identification of remedial action should ensure sensitivities are appropriately managed.
- **Green** – Not Sensitive: The issue has been assessed adequately as not being sensitive, and this has been documented in the checklist.

In addition to rating each issue, the project also needs to be given an 'overall' sensitivity rating once all elements are complete. In most cases, the 'overall' sensitivity rating should be the same as the most sensitively rated part of the project (i.e. if one section is marked as 'Red- Highly Sensitive', then the project's overall rating should be 'Red-Highly Sensitive' too). Where projects are highlighted as 'red' or 'high risk', it is recommended that users seek specialist guidance and/or independent ethical advice as appropriate.

Project Title:

Project Manager:
Department/Division/Branch:

GSR Principle 1: Research should have a clear and defined public benefit		
Principle components	**Considerations and mitigations**	**Sensitivity rating**
a) Identifying a user need *- Does the research aim to meet a clearly defined, legitimate and unmet user need?* *- Have you engaged with relevant stakeholders in order to fully establish the user need?* *- Is other research already taking place with the same groups, which could be amalgamated to prevent over-researching small populations?*		Red Amber Green
b) Public benefit *- How will the findings from this research benefit the public?* *- Are there any risks that public benefits will not be realised?* *- Could the research disproportionately benefit or disadvantage a particular group?* *- Is it necessary to conduct this research in order to realise the public benefits?* *- Does the public benefit outweigh any identified risks?*		Red Amber Green
c) Transparency and Dissemination *- Have you got a clear dissemination strategy in place? i.e. where, when and how you will disseminate findings?* *- What is our role/responsibility to different stakeholders and research participants around dissemination?* *- Are there any accessibility or equality issues about how findings are made available or presented?* *- How will you ensure that research findings are brought to the attention of relevant stakeholders?* *- Will the research process be fully transparent?*		Red Amber Green

GSR Principle 2: Research should be based on sound research methods and protect against bias in the interpretation of findings		
Principle components	**Considerations and mitigations**	**Sensitivity rating**
a) Proposed methodology *- Is the research design appropriate to the groups being interviewed?* *- Is this level of respondent burden appropriate for the groups of people involved in the research?* *- How will the research consider the diverse perspectives of people according to their gender, disability, ethnicity, religion, sexual orientation, socio-economic status and age?* *- Is the proposed methodology the best and most cost-effective way of answering the research questions?* *-Have you considered all the possible potential biases in the data, methods and analysis techniques that will be used in the project?* *- Are you using new, emerging, or controversial methodologies or techniques? If so, what steps have been taken to ensure the integrity of the methods and results?*		**Red** **Amber** **Green**
b) External ethical scrutiny *- Has your project been subject to independent ethical review?* *- Does the project fall will in the remit of the UK Policy Framework for Health and Social Care Research? (See section 3.13-3.15 in the main guidance for further information and links to decision making tools)* *- Will contracted partners be required to go through internal ethics committees?*		**Red** **Amber** **Green**

GSR Principle 3: Research should adhere to data protection regulations and the secure handling of personal data		
Principle components	**Considerations and mitigations**	**Sensitivity rating**
a) Data Protection *- What procedures are in place to ensure adherence to the GDPR, Data Protection Act (2018) and other government data security requirements?* *- What is your legal basis for processing of personal data?*		**Red** **Amber** **Green**

- How will you inform and assure participants that you will treat their data in accordance with the relevant data protection legislation (e.g. privacy notice)? *- Do you need to complete a Data Protection Impact Assessment?*		
b) Research findings *- How can you ensure that the data collected during the research is not going to be used for any other than its originally defined purpose?* *- What checks are in place to ensure that no one can be identified in reporting? (for both quantitative and qualitative work)*		**Red** **Amber** **Green**

GSR Principle 4: Participation in research should be based on specific and informed consent		
Principle components	**Considerations and mitigations**	**Sensitivity rating**
a) Consent to take part in primary research *- What processes are in place to ensure that participants are informed and understand the project, the purpose, the client, topics and that their participation is voluntary? Will you ensure that participants have given fully informed consent before taking part in the research?* *- If you intend to follow up participants with further research, has this been made clear and consent given?*		**Red** **Amber** **Green**
b) Consent via gatekeepers or proxy *- Is this required? If so, what processes need to be in place?* *- What steps can be taken to ensure representativeness, i.e. to ensure that participants are not "hand-picked" by gatekeepers or that there is a minority view promoted?*		**Red** **Amber** Green
c) Children and young people (aged 16 and under) *- What processes are in place to ensure consent from a parent or legal guardian has been sought for children under the age of 16 and how has this been done?* *- How can you ensure that the children are also adequately informed about the research?*		**Red** **Amber** **Green**

	Considerations and mitigations	Sensitivity rating
- What processes are in place to ensure, where required, an adult accompanies children and young people during an interview? Who is best to accompany the child(ren)?		
d) Vulnerable adults - Are you interviewing participants who may lack the mental capacity to provide informed consent for themselves? If so, the successful contractor may be required to obtain clearance from an NHS Research Ethics Committee. - How can you ensure that participants are adequately informed about the work?		Red Amber Green
e) Access protocols - Are there any particular access protocols for certain groups, does this apply to your respondent group? Access protocols could apply to: Courts, Police, Prisons, Schools		Red Amber Green
f) Secondary Research - Does the consent cover all potential future uses of the data? - If your legal basis for processing data is not consent, have you still considered whether individuals have been (or should be) given the choice of their data being included in this research?		Red Amber Green
g) Incentives? - Is the use of incentives necessary? What evidence do you have that the use of incentives will significantly improve the research? - Is your use of incentives in keeping with the GSR ethical principles? (See section 2.33-2.35 in the main guidance for further information)		Red Amber Green

GSR Principle 5: Research should enable participation of the groups it seeks to represent		
Principle components	**Considerations and mitigations**	**Sensitivity rating**
a) Identifying and reducing the barriers to participation - What steps have you taken to identify potential barriers to participation? -What steps can be taken to encourage and widen participation?		Red Amber Green

(e.g. travel costs, childcare, varying times and locations of interviews, accessibility of venues, advance letters in different languages etc) *- Do you need interviewer assistance such as offering help with completion, or a translator?*		
b) Ensuring that hard to reach groups are included *- Is the research and sample design appropriate?* *- Might the data collection method exclude some groups of people?* *- Do you need to consult with others (e.g. support groups, charities and other relevant stakeholders) so that barriers to participation for certain groups are fully identified and reduced?*		**Red** **Amber** **Green**

GSR Principle 6: Research should be conducted in a manner that minimises personal and social harm		
Principle components	**Considerations and mitigations**	**Sensitivity rating**
a) Research participants *- Do any of the research questions cover stressful or culturally sensitive subjects? If so, how will stress and sensitivities be minimised?* *- How can interview length be kept to the minimum?* *- Do you need to ensure that there is post-interview support?* *- How will you offer support to those that are approached but decide not to participate in the research?*		**Red** **Amber** **Green**
b) Interviewers/ researchers *- What procedures are in place to ensure interviewers are properly trained (for example in methods, relevant legislation such as the Equality Act)?* *- Do all interviewers /researchers have appropriate security clearance (e.g. criminal record checks or disclosure Scotland if interviewing/ working with children)?* *- What procedures are in place for handling disclosures of abuse, self-harm or suicidal ideation?* *- What procedures are in place to ensure the safety of the interviewer/ researcher?*		**Red** **Amber** **Green**

- Has consideration been given to exposure of researchers and analysts to sensitive topics? (e.g. potential for vicarious trauma)		
c) Wider Social Groups *- How will you mitigate any potential for harm to those who have not taken part in the research? For example, research focussing on specific groups has the potential to impact the wider social group.* *- Have you considered or sought the public's views on the research?*		**Red** **Amber** **Green**

Relevant legislation	
Will your research comply with all relevant legislation? For example: • Anti-Terrorism, Crime and Security Act (2001) • Crime and Disorder Act (1998) • Data Protection Act (2018) • Freedom of Information Act (2000) • General Data Protection Regulation (2016) • Health and Social Care Act (2012) • Human Rights Act (1998) • Mental Capacity Act (2005) • Equality Act (2010) - Public Sector Equality Duty Do you need to ensure compliance with any additional legislation, policy, code of practice or guidance?	

Summary	Overall sensitivity rating
What are the key sensitivities?	**Red** **Amber** **Green**
How are you addressing them?	
How often will you re-visit this research ethics assessment?	

Appendix D: Acknowledgements