

Report of the Bartlett Ethics Working Group Pilot (2016-7)

1. Preamble/Background

The Bartlett consists of the Bartlett School of Architecture (BSA), the Bartlett School of Construction and Project Management (BSCPM), the Bartlett School of Environment, Energy and Resources (BSEER), the Bartlett School of Planning (BSP), the Centre for Advanced Spatial Analysis (CASA), and the Development Planning Unit (DPU). In 2016-7 there were approx. 320 academic and research staff, approx. 300 PGR students, and approx. 2000 UG and PGT students.

The research conducted in the Bartlett covers a variety of methods from scientific, to social science, to humanities, to design and practice-led research, but the majority involves work with human subjects, from observation to participation. Additionally, much of our teaching involves field work, and different kinds of contact with human subjects, although the majority of this is relatively light-touch and repetitive in manner.

Given that so much Bartlett research and teaching involves interaction of some kind with human subjects, the proposed changes to the ethics exemptions that are being introduced, that will require engagement with human subjects to be given ethical approval. This has a potentially enormous impact on the workload in our Faculty, and the resources required to support that increase in workload. Thus much of the work of the pilot has been to conduct in-depth sample studies that try to envisage processes and procedures that will be manageable and light touch, and that emphasise a questioning and self-reflective attitude to ethics, in line with our aim to develop ethical awareness in researchers and in the future built environment practitioners we educate. We are also mindful of the College's stated policy to ensure that all new procedures are *proportionate* and *devolved*.

The Bartlett Ethics Working Group (BEWG) was established in January 2015, by Jane Rendell, with the aim of developing a Bartlett vision and code to guide the practice of ethics in teaching, research and enterprise in the built environment. (see Appendix 1).

The BEWG has been the vehicle for putting into practice the research findings from the *Ethics in Built Environment* research project and the *Bartlett Ethics Commission* (see Appendix 2) in line with UCL's *Statement on Research Integrity* and UCL's *General Code of Ethical Principles*.

2. Description of the Bartlett Ethics Pilot and Summary of the Findings

Through BEWG monthly meetings, work started on the UCL Ethics Pilot in September 2016, with the aim of mapping, modelling and testing the implications of the new UCL low risk ethics process for the Faculty, in terms of manageable would approval processes from centrally to locally-managed, administrated, and resourced. Work has included:

2.1 Mapping the implications of using the new UCL exemptions at the Bartlett. (see Appendix 3).

The proposed UCL exemptions state that '**All research** involving human participants and/or their data requires ethical approval'. This is a significant change from the previous exemptions, and so we decided to undertake a rough mapping of a sample of the Faculty, the Bartlett School of Architecture, to gauge the impact of this shift. (See Appendix 3). We discovered that the risk was predominantly low risk, but that the number of low risk forms which would be required across all taught UG and PGT modules could be between 1000 and 2000 annually, just in the Bartlett School of Architecture alone, whereas for PGR and staff it was likely to be around 70.

And another estimate, for the BSP, envisaged that with up to 350 PGT dissertations per year, 350 low risk forms would need completing, taking between 2 hours (for a simple case) and 7 hours (for a complex case). Additionally, a high proportion of all the modules taught in the BSP, i.e. 30 UG modules and about 60 modules: probably more than 50% involve observation and interaction with human subjects.

Practically, the Bartlett does not have the resources to set up and use a system that would need to process these volumes. And *philosophically*, we agreed that since ethics is a practice underpinned by a set of principles, we needed to develop a process for assessing ethical risk that was embedded in our research *and* pedagogy and at the heart of our approach to educating built environment practitioners of the future.

2.2 Evolving a new model for handling low risk ethics.

Given the large volume of low and possibly repeated risk in the taught programmes, compared to staff and PGR, we started to develop and trial a model for reviewing low risk ethics which involved two possible pathways.

Since our mapping of staff and PGR student ethical review showed that it could range across low and high risk, and works well at the moment through the close academic engagement of the supervisor, it made sense to continue in this way in the future, with the research reviewed at Department/School level, in the case of staff, by the relevant committee (usually a research committee) and in the case of PGR students, with supervisors, Departments/Schools would also take responsibility for identifying High Risk projects and ensure that these are passed on to the UCL REC for full assessment.

Since ethical review for postgraduate and undergraduate taught programmes involves mainly low risk, and often the same kind of low risk being repeated, we focused on developing a system involving **module approvals** based on the use of specific **ethical protocols**.

Our pilot therefore included two trials for module approval – Pilot 1 involving student-driven research but with multiple similar risks around observation of human subjects, and Pilot 2, an overseas field trip.

Pilot 1: Module Approval. Dr Kerstin Sailer, Space Syntax, BSA. (see Appendix 4)

Pilot 2: Module Approval. Dr Michael Walls, DPU. (see Appendix 5)

Additionally, given that one School in the Faculty, BSEER, already had an Ethics Director, Michelle Shipworth, the third Pilot was a much more intensive and extensive exercise which involved developing a School-based set of ethical processes and procedures. Shipworth was a member of UCL's ethics working group, and was also involved in developing UCL 's reforms to low risk ethics policies, processes and forms (content, structure, wording and format).

Pilot 3: Michelle Shipworth, Director of Ethics, BSEER. (see Appendix 6)

This involved:

1. Establishing a functioning low-risk research ethics system (with training, reviewers, processes...)
2. Evaluating 72 low risk projects in-house (39 PGT, 27 PGR & 6 Staff projects)

3. Piloting the complete new UCL low-risk process with 90 PGT students (most were able to complete the exemption form for inclusion in their dissertations) underlining the importance of the module-approval approach for PGT.
4. Piloting the new UCL low-risk ethics application form with 34 applicants and have many recommendations to make regarding modifying the forms to improve understanding;
5. Developing a BSEER based approach to the additional workload (in addition to modular approvals) involving TAs, Institute ethics leads, Course Directors, and research and teaching managers to distribute the workload and integrate research ethics into our everyday work, and an evaluation form to speed up low risk ethics application evaluations.

2.3 Resourcing implications

2.3.1 Staff time

The pilots each revealed the heavy **resource implications** of the College's existing proposals for the reform of the ethics approval process. For example, of the low risk forms: Pilot 1 estimated that every ethical low risk approval took around 2 hours of work of staff time (8 hours for more complex cases, and when engaging with students where English is not their first language). Since the Bartlett has 2000 UG and PGT students, and the majority undertake a dissertation, it became clear that UG and PGT dissertations would need to use a system involving the implementation of a manageable **module approval process** and the use of thematic **research protocols**.

2.3.2 Data Storage: Paper versus On-Line Systems.

We were not able to pilot the on-line system and so the pilots involved paper-based systems, but it is clear from the amount of detailed work undertaken for each of the three pilots and the need to support different specialist needs, that it is vital that UCL develop an online system that is flexible enough to adapt to the specific needs of each Department/School in a devolved structure. This is going to require a high degree of resourcing to set up, but also to operate. It is important that Faculties are involved in developing these systems so that they are fit for purpose.

It also became clear that Moodle has the potential for storing much of the material required for low risk ethics approvals related to teaching, for example module approval forms and protocols.

3. Recommendations for a Devolved System for the Bartlett

Post the UCL ethics pilot, the Bartlett will need to set up a new structure and system for reviewing ethics to be developed during 2017-8, and formally in place by September 2018.

We propose a two-part structure and two-pathway system that is *proportionate* and *appropriate* to the level and scale of ethical risk at the Bartlett, given the diversity of teaching and research specialisms, as well as the different sizes and structures of each Department/School.

3.1 A two-part structure

Low risk research, including UG and PG teaching, will be reviewed at Department/School level since this allows the setting up of specific staffing arrangements, systems and sets of protocols that are most appropriate for the specific research and teaching specialisms. We envisage that the Faculty would be required to provide oversight to ensure parity and consistency.

3.1.1 Faculty level

The Bartlett will need to establish a Bartlett Ethics Advisory Group (BEAG) similar to the Faculty's Enterprise Advisory Group and the Research Advisory Group to support and provide governance, leadership and oversight for the development of the Department/School structure and system.

BEAG will report to the UCL Ethics Committee and to the Bartlett's Management Advisory Group. We will draw up a Terms of Reference once UCL's policies have been finalised. This may include overseeing reports from Departments/ Schools, but it might involve sending high risk ethics directly to UCL from each Departments/ School.

BEAG membership will be developed out of the rationale for the BEWG, with an ethics representative from each Department/School and key UCL and Faculty members, as well as a member from another UCL Faculty, a specialist in ethics from REC, and a lay member. It will require a dedicated chair and deputy chair and a secretary.

BEAG will be a forum for discussion on ethical matters, governance matters, linking to out to the Professions, to UCL, and to the Bartlett's Department/Schools.

BEAG will develop leadership on ethics and support training for staff and students in built environment ethics.

BEAG, with expertise provided from UCL REC, will support the development of each Department/School structure and system, and sign off on the systems and protocols to be used in each Department/School including module exemptions.

3.1.2 Department/School Level.

Each Department/School will deal with all low risk ethics and provide leadership, guidance and support for ethics for UG, PGT, PGR and staff research.

A role will need to be established for at least one member of academic staff dedicated to ethics in each Department/School. This needs careful scoping and resourcing. This staff member(s) will need training.

Such a role will likely need the support of administrative staff, also with ethical training.

There is currently one role of this sort in BSEER, and we will use this role as a starting point for developing a costing based on the roles and responsibilities of the role, adjusted for level of ethical risk, and staff and student FTE.

3.2 A two-pathway system.

We propose to use a model for reviewing low risk ethics with two pathways, this is because our teaching as well as our research involves human subjects, and as such requires ethical review. This risk is usually low level, and often involves a similar risk factor. There is a large volume of work with this level of risk to be reviewed.

3.2.1 Ethical review for staff and PGR students.

This will involve ethical review at Department/School level, with high risk going to UCL REC, and low risk – using UCL's exemption, checklist, and low risk forms – being reviewed in the Department/School.

3.3.2 Ethical review for PGT and UT programmes.

All teaching programmes/courses/modules which involve human subjects will use a system currently in development involving Module Approvals (two have been piloted) and the use of appropriate Ethical Protocols (these are currently under development).

Module Approval: We need to develop a Module Approval Form to be used across the Faculty. (see Appendix 4 and 5, for detailed info on the pilots, and Appendix 7 for a generic draft sample of a module approval form).

A Set of Protocols: We will develop of a set of ethical protocols that relate to common methods in Built Environment research, and include case studies of good practice. The protocols will present both essential guidance on requirements related to the three key ethical principles of informed consent, benefit not harm, confidentiality. They will also provide generative questions that prompt reflection on ethical issues that arise in built environment research. This balance between the instructive and the reflective will be key to help navigate ethical issues that arise in practice with confidence and creativity. We have so far identified six, and these are currently being developed, but we envisage more. (See Appendix 8 for a draft of 2. Making Images, and see Appendix 9 for a sample pathway mapped for a particular module)

1. Asking questions: interviews / questionnaires / surveys / focus groups
2. Making images: photographing / filming / mapping (See Appendix 8)
3. Taking observations: participant observation / structured observation / physical monitoring / spatial experiments with new technologies
4. Working collaboratively: participation with community groups / partnerships with organisations
5. Using data: combining data sets / social media data
6. Staging research: events / exhibits / installations / interventions

The protocols will act as the basis for module/course approvals and establish a set of easy to administer processes given limited additional support.

The protocols can be used in teaching and in training, and act as a point of reference for the low risk applications, and in considering ethical issues that relate to their research field, these protocols can act as the basis for ethical clearance if proposed research falls within the parameters of an agreed protocol and provide a template for good ethical practice to ensure research is ethically robust.

The protocols could be used in place of low risk forms for PGT dissertations to reduce workload. To avoid a tick-box mentality, students might be required to produce a reflective commentary on their approach to ethics, and the type of protocols they used and why.

Principles: With input from applied ethics experts, IDEA, and alongside UCL's Ethical Codes, and as part of the devolved ethics structure for the Faculty, as part of the Bartlett Ethics Commission, we will look at developing a set of ethical principles for built environment research to underpin the protocols, most likely operating at both levels – Department/School and Faculty.

4. Concluding Comments and Reflections

4.1 Questions regarding UCL's Ethical Review Devolution process.

The work of the pilot has highlighted to us that we remain unclear around several aspects of UCL's Ethical Review Devolution process, namely:

4.1.1 Strategic aims, and the balance of system monitoring versus reflective judgement

We are still not clear on the aims of the devolution process and our role in it. Is UCL's aim primarily one of compliance with RCUK guidelines or is it to improve existing practices for educating students and staff in built environment ethics? How does the Ethical Review Devolution process link to UCL's broader strategies such as UCL 2034? Is there a particular aspect of the ethics strategy that we should be aiming to enhance and support? The resource implications of the proposed reforms are

intensive and will need to be rolled out with sensitivity to the practices of teaching and research across the university, or they could cause serious harm to UCL's ability to maintain its world class status.

4.1.2 Resource implications of new exemptions, especially for teaching

We would like more clarity on how the decision to extend exemptions to include 'All research involving human participants and/or their data requires ethical approval' was reached. Can this be revisited? Can this also form a part of the pilot? We would be happy to help in the review of the guidelines. Moreover, has UCL examined the resource implications of proposed changes? As the definition of low risk clearance is being extended to cover a wider remit of research and teaching activities, substantial future resourcing will be required at a time when Faculties are being asked to increase their contributions to the Centre (see below).

4.2 Resourcing

We have serious concerns about the degree of resource required to set up a devolved structure. We envisage the following scenario as a basic bottom line for the Bartlett.

Given that the Director of Ethics for BSEER is the only Bartlett role (academic or administrative) with ethics as a formal part of the role, along with figures for UG, PGT, PGR and staff from across the Bartlett, we have used this role as a model for estimating the FTE required to set up a devolved ethics structure in the Bartlett.

We estimate that we would need to establish 3.25FTE posts (BSA: 1.0FTE, BSP: 0.5FTE, CASA: 0.25FTE, DPU: 0.5FTE, BSEER: 0.5FTE, BSCPM: 0.5FTE). These ethics lead roles could be for existing academic staff or new appointments, and could be academic, administrative and/or a balance of the two.

A resource costing would also need to include:

1. Additional support (administrative or TA support) for the academic ethics leads (this is required as Pilot 3 shows).
2. Time at School and Faculty level for BEAG chairs, members and administrative support.
3. Time for individual staff, supervisors and research administrators to process low risk forms, complete module approval forms and generate appropriate protocols and modes of assessing the student's use of protocols.
4. Time for development of processes and attending and delivering staff training.
5. Time for the preparation and delivery of ethics lectures and seminars for student training.

4.3 Developing alternative ethical structures based on research has provided rigour and potential pathways to impact. (See Appendix 2)

The work of the Bartlett ethics pilot has been informed by the research conducted by the Bartlett Ethics Fellow as part of the Bartlett Ethics Commission, and by the academic experience and invention behind each Pilots and the work of the BEWG overall. As such, the work of the Bartlett Ethics Pilot goes beyond a project for complying with new ethics regulations, and rather offers original new knowledge to inform the practice of ethics in the built environment.

For example:

1. The alternative pathways have been proposed on the basis of faculty-wide interviews alongside research into best practice from other institutions and industry.
2. Engagement with international institutions who have pioneered studies into practice-led ethics such as the University of Melbourne, through the setting up of a joint conference, has provided

helpful external expert feedback and helped develop an international network on ethical issues in design research, as well as creating impact in the academic world.

3. Engagement with professional bodies such as the RIBA and ARB who have expressed great interest in this research, has provided the start for pathways to impact and potential influence on policy.

4. These alternative structures would, if implemented, demonstrate that the Bartlett and UCL are leading the development of specialist ethical procedures, which could act as a template for others.

5. List of Appendices

Appendix 1 | Bartlett Ethics Working Group

Appendix 2 | Bartlett Ethics Commission

Appendix 3 Bartlett School of Architecture Ethics Mapping Table

Appendix 4 (4.1, 4.2, 4.3) Pilot 1 Dr Kerstin Sailer, Space Syntax BSA, Module Approval

Appendix 5 Pilot 2 Dr Michael Walls, DPU, Module Approval

Appendix 6 Pilot 3 Michelle Shipworth, BSEER, Report for Ethics Pilot for BSEER

Appendix 7 Sample Module Approval Form

Appendix 8 Sample Draft Protocol

Appendix 9 Sample Draft Decision Tree showing two pathways

Jane Rendell (co-chair of BEWG), with input from the following members of BEWG:

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