

Ethical principles in Social Policy research and practice

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The guidelines on research ethics recently published by the Social Policy Association are dominated by an individualised model which seems more appropriate to bio-medical research than it does to the nature of Social Policy. Some of the principles which are being advocated, like the arguments for informed consent or anonymity, are over-generalised. Some, like the commitment to protect the interests of research participants over others or the requirement of confidentiality for all research information, are misconceived. Other aspects, like the lack of consideration of the critical role of Social Policy or the discussion of the research relationship, are disquieting. At times the guidelines seem more concerned with maintaining the funding streams for social policy research, justified in part by an assertion of the need to maintain the career patterns of contract researchers, than with any commitment to traditional academic values.

The purpose of this paper is to stimulate a discussion about the relationship between Social Policy research and practice, and its implications for the ethical standards that should be applied to the subject. Social Policy has to call it as it is – ‘speaking truth to power’. We will argue that research in Social Policy needs to be guided by standards related to professional practice in policy, public accountability and other general principles related to the promotion of welfare.

The guidelines for ethical research produced by the SPA follow the pattern of many other codes of guidance. When the Social Policy Association decided to adopt a set of guidelines for ethical research, it took as examples the codes of the British Sociological Association,¹ and the ESRC Research Framework². These codes are fairly typical of others, such as the British Society of Criminology³, the Association of Social Anthropologists,⁴ or the British Educational Research Association⁵, which cover similar ground in much the same way. Most of these codes have four main elements. They consider, firstly, the *impact* of the research, including

- the potential implications of research for participants

¹ British Sociological Association, 2002, Statement of ethical practice for the British Sociological Association, <http://www.sociology.org.uk/as4bsoce.pdf>

² Economic and Social Research Council, 2005, Research Ethics Framework (REF), http://www.esrc.ac.uk/ESRCInfoCentre/Images/ESRC_Re_Ethics_Frame_tcm6-11291.pdf

³ British Society of Criminology, 2003, Code of Ethics for Researchers in the field of Criminology, <http://www.britsoccrim.org/ethics.htm>

⁴ Association of Social Anthropologists of the Commonwealth, n.d., Ethical guidelines for good research practice, <http://www.asa.anthropology.ac.uk/ethics2.html>

⁵ British Educational Research Association, 1992, Ethical guidelines, <http://www.bera.ac.uk/guidelines.html>

- the potential implications of research for non-participants, and
- the uses to which research can be put.

Next, they cover *treatment of participants*, including

- informed consent
- confidentiality and anonymity, and
- special consideration of vulnerable respondents.

Third, there are *disciplinary considerations*. Researchers are expected to:

- maintain research of high quality
- display competence
- act responsibly towards others in their field, and
- advance their discipline

Fourth, there are rules concerning *research relationships*. These include:

- the responsibilities of the researcher to the body commissioning the research
- responsibilities to the host institution
- commitments to fellow researchers, and
- integrity in dealing with participants and stakeholders

The SPA guidelines have borrowed liberally from this kind of scheme. The guidelines are laid out in four main sections: obligations to society, obligations to research participants, obligations to research sponsors and funders, and obligations to the subject and to colleagues. Much of the emphasis falls on the promotion of the subject of social policy and research relationships, including in particular research relationships between permanent and contract staff. In the context of social policy these elements seem to confuse the distinctions among ethical frameworks, codes of professional practice, and relationships between employer and employee. Some elements, for example the exhortation to equal opportunities and related matters, simply restate legal obligations which exist in any event. More seriously, there are potential contradictions between different elements specified in these sections, in particular in relation to contractual obligations to research funders, which stands in sharp contrast with obligations to ‘speak truth to power’.

1. The SPA Guidelines

The SPA guidelines open with a statement of aims, stating that the object is to offer guidelines, without prescription, which will inform practice and that the guidance is intended to be particularly relevant to social policy. Social Policy is described as a field concerned with academic, policy and practice issues, that it engages with service users, that it works with a range of disciplines and methodologies, and that it disseminates results to a range of audiences. This is not realised in the material which follows. Most of the guidelines have been stitched together from existing codes, without any thought as to how they relate to social policy in practice.

The dominant paradigm of research ethics in the UK, and indeed throughout the world, has been the model of ethical scrutiny in biomedical research. The rules were drawn up in 1947 in the course of examining the abuse of medical research under the Nazi regime. The Nuremberg trials established ten principles:

- “The voluntary consent of the human subject is absolutely essential.
- The experiment should be such as to yield fruitful results for the good of society,
- The experiment should be so designed and based on the results of animal

experimentation and a knowledge of the natural history of the disease or other problem under study

The experiment should be so conducted as to avoid all unnecessary physical and mental suffering and injury.

No experiment should be conducted where there is an a priori reason to believe that death or disabling injury will occur;

The degree of risk to be taken should never exceed that determined by the humanitarian importance of the problem to be solved by the experiment.

Proper preparations should be made and adequate facilities provided to protect the experimental subject

The experiment should be conducted only by scientifically qualified persons.

...

During the course of the experiment the human subject should be at liberty to bring the experiment to an end ...

During the course of the experiment the scientist in charge must be prepared to terminate the experiment ...⁶

This is the source of many of the rules which have come to be accepted throughout medical research, including voluntary, informed consent, the avoidance of harm to subjects and a requirement for competence in research.

These principles have been extended, rightly or wrongly, to many branches of social science. There are arguments as to whether they are really appropriate for all kinds of social science, but we can leave those aside: Social Policy is not like every other social science. Many of the guidelines which have been developed since Nuremberg belong to a different kind of academic subject, concerned with the reputation of the discipline and the advancement of knowledge, rather than the applied research that is central to Social Policy. After the preamble, however, the guidelines have nothing to say about policy, and very little to say about society.

2. Obligations to society

The researcher's "obligations to society" are considered in four sections:

- The standing of the discipline
- Compliance with the law
- Dealing with conflicts of interest, and
- "Reflexivity", identified with openness about research methods and their limitations.

This does not tell us very much about "obligations to society" at all. The standing of the discipline belongs with "obligations to the subject", conflicts of interest, as identified, mainly relate to research relationships, and reflexivity is about a disciplinary approach. The only sentence in the section which relates directly to the obligation to society is this:

"Social policy researchers have a general responsibility to undertake research that will contribute to the public good and to ensure that their research is appropriately applied and disseminated."

⁶ Nuremberg Code, 1947, reproduced at

<http://ohsr.od.nih.gov/guidelines/nuremberg.html>

This is abysmally inadequate. The most fundamental principle in research ethics is ‘beneficence’ - the question of who benefits, and who is harmed, by the research. This is the first principle for every student, for every practitioner, and for every researcher. In disciplinary, non-applied research, the question of beneficence is commonly translated into a concern with the research process, because there is a presumption that the research will have no other effect. In the case of social policy, that presumption will not do. Social policy is done for a purpose, and every researcher has a moral duty to consider what the impact of the research might be. For example, the work of the researcher should not lend itself to procedures which are offensive, degrading or detrimental to people’s welfare. It seems astonishing that a set of principles which begins at Nuremberg should not recognise the possibility that a contribution to public good for some may be a contribution to the harm of others.

3. The research process

The rights that the SPA document accords to participants are as follows:

- The right to exercise consent
- The right to withdraw from research
- The right not to be exposed to avoidable harm
- The duty on researchers to take all possible steps to protect them from harm
- The protection of their rights, interests, sensitivities and privacy
- The protection of those who are vulnerable by virtue of incapacity, social status or powerlessness.
- Confidentiality , including confidentiality of data
- Anonymity
- Provision of information about support services.
- Sharing research findings with participants, and
- User involvement.

These principles are not wrong in every case, but they are desperately over-generalized. They apply in some circumstances, but those circumstances are nearly all special cases, and they do not represent the characteristic modes of activity in social policy research.

The first, core problem is that the guidelines are concerned only with the rights of participants. This is an elementary mistake (made equally by some other codes). A participant is someone who is taking part in the research, but those are not the only people who might be affected. A subject is someone who is being studied, whether or not that person is participating. Some people might not like the reference to ‘subjects’, because it has been used in ways which is disempowering; that is unfortunate, because we need the distinction. We need to understand that the agreement of a participant – for example, an agency worker, a carer, a community activist - is not a guarantee of protection for research subjects (service users, people being cared for, members of a community) in any case where the subject is broader or more widely inclusive. The interests of participants and subjects may conflict. For example, discussions of responses to domestic violence – which are especially problematic, for reasons which we will come on to shortly - may reasonably be focused on abused partners as participants; but the subject usually extends to include the abusive partner.

In the research process, both the participant and the subject have rights, but they are not necessarily the same rights. Rights can be general – applying to everyone – or particular – pertaining only to specific individuals (like someone with contractual rights). Everyone affected by research has general rights – for example, human rights, or general legal rights. People have the right not to be intimidated or subject to racist abuse. The participants in research, however, have particular rights – rights which are created thorough the interaction of the researcher with the participant. If, for example, a researcher promises the participant that they will be able to see a recording, that promise should be kept. As a corollary, researchers should avoid making promises they will not be able to keep – like misplaced promises of confidentiality – because that puts them in the position where they must breach one ethical principle or another.

The second set of problems relates to the clutch of principles taken from the Nuremberg Codes and bio-medical research. Medical research works almost wholly within the private sphere. The Australian National Health and Medical Research Council’s guidance explains:

“Individuals have a sphere of life from which they should be able to exclude any intrusion ... A major application of the concept of privacy is information privacy: the interest of a person in controlling access to and use of any information personal to that person.”⁷

The right of individuals to consent, the right not to be researched if they don’t want to be, the presumption of confidentiality and the treatment of data as confidential are all aspects of the private sphere. That principle is largely uncontested. It has, however, crucial limitations. It applies to what is private, not what is public. When, for example, the BMJ published a report which had observed people’s use of mobile phones while driving in their cars, the issue of privacy did not arise – driving in a public place is always a public activity.⁸ The actions of government and of public authorities are also public. No consent is generally required to report legal cases or the proceedings of a court, or the actions of government, or the deliberations of a democratic body, or a submission to a public consultation. The whole point of laws like the Freedom of Information Act is to clarify that such information is not private, and should not be treated as if it is. And the suggestion that people should be treated confidentially and anonymously regardless of status of role is an absurdity which does threatens the feasibility of any research on the actions of government.

This distinction between the public and private sphere is not without its problems, and there are particular issues at the boundary between the private and private sphere. At times, social policy does transgress, deliberately and knowingly, into the private sphere. It happens because some of the issues which are private are issues which people feel should not be. An example is the case of domestic violence. This was overwhelmingly treated as a private matter for much of the period before second wave feminism and the growth of women’s aid. The core of the argument for dealing with

⁷ Australian National Government, National Health and Medical Research Council, n.d., National Statement on Ethical Conduct in Research Involving Humans, 18.1, <http://www.nhmrc.gov.au/publications/humans/part18.htm>.

⁸ Walker L, Williams J, Jamrozik L, 2006, Unsafe driving behaviour and four wheel drive vehicles, *British Medical Journal* 331:71, 8th July

domestic violence publicly was that it could not be identified, responded to or combatted if it was not. There are now laws in some US states where the reporting of domestic violence is treated as mandatory, precisely to overcome the limitations of consent.

When the SPA's guidelines state, then, that research has to depend on informed consent, or that "Information provided to a researcher in the context of a research study should be treated as confidential", they are deeply misguided. (The objection is not just that the second of these examples is absurdly worded - if information is confidential, it cannot be published. What the drafters presumably mean to say is that information is presumed to be private. That proposition at least makes sense, even if it is the wrong principle.) Social policy is dealing characteristically with issues of social policy, and those are public issues. There ought to be a good reason not to reveal information, rather than a presumption that it cannot be revealed.

The third problem relates to the duty to avoid harm. The guidelines suggest that every participant should be protected from avoidable harm, that the researcher has a duty to avoid adverse consequences. This is based on the principle of beneficence, as expressed in the Nuremberg code - "The experiment should be so conducted as to avoid all unnecessary physical and mental suffering and injury." In this context, it is misapplied. Social policy is concerned with policy, and particularly with the outcomes of policy. Any policy may have good effects for some people and bad effects for others. Any change, any effect which the research has will affect people for good or ill. When a policy researcher evaluates an agency, there is a risk that people in that agency will lose their jobs. When a researcher reviews the operation of a policy, changes to improve the position of some people may threaten the position of others. When a researcher is investigating the abuse or violation of people who are vulnerable, it exposes the perpetrator to risk. There are certainly those who will be uncomfortable with the idea that they are causing harm. Learn to live with it. If researchers are exercising any power or influence in social policy, causing harm goes with the territory. The ethical objective is not to minimise avoidable harm; it is to ensure that any adverse consequences will be legitimate and defensible.

4. The research relationship

Several elements in the guidelines relate respectively to relationships with sponsors / funders and relationships with employed contract researchers. The elements relating to the performance of contracts are reasonable enough, but what are they doing in an ethics statement? Performance of a contract is a matter of contractual obligation, the execution of tasks in return for reward. They are matters of civil law and market activity. Contracts are not set in stone; most are open to renegotiation. It is unusual for any research to finish in exactly the place where it set out. If any agency doesn't perform it may be sued for breach of contract and will get a bad name and no return of custom. This is not obviously an ethical discourse, unless we artificially construct a 'social policy community' as some quasi-legal entity which has responsibility for the actions of all its members.

Equally, there are obligations to colleagues and in particular to contract researchers and their training and employment status. This is a more complex area with a messier

pattern of relationships, but some of the same issues emerge. Again let us quote, selectively, from the SPA Ethics statement:

“At a time when short-term contract research constitutes a significant proportion of the research work undertaken in social policy, social policy researchers in secure employment have important responsibilities to promote the interests of colleagues who are in a less secure position.”

We certainly have a responsibility to fellow workers, in terms of both solidarity and self interest. It is never in the interests of workers to allow a group of colleagues to be treated worse than others, and there is an obligation of solidarity to stand by them in terms of employment and conditions. This is why we should welcome the current legal obligations to treat workers employed on contract as permanent workers after two years and press for that period of time to be shortened. We should never evade the legal rights of colleagues as employees. Is this, however, the kind of consideration which should drive a statement of ethics? Is a research project which employs a research assistant more ethical, more virtuous or more consistent with moral principles, other things being equal, than one that does not? We do not think so; and the confusion of ethical conduct with the interests of academics working in social policy is characteristic of the moral myopia that blights these guidelines.

There is a rather more serious question concerning relationships with sponsors or funders. We quote, selectively, from the SPA Ethics statement:

- Researchers also have responsibility to maintain good relations with sponsors/funders in the interests of ensuring the continuing provision of research funding.
- Researchers should avoid damaging confrontations with funding agencies which might reduce research possibilities for others.
- Researchers should endeavour to maintain good relationships with funding and professional agencies to achieve the aim of advancing knowledge and avoid bringing the social policy community into disrepute.

These are certainly important issues. Unfortunately, the SPA has lined up on the wrong side of the debate. Academic material is liable to be used – and abused – by the people who pay for it. An example is provided by the discussion of the relationship between family income, performance at GCSE, and potential social mobility in *Getting On, Getting Ahead*. This document quotes Gregg and Macmillan (2008) ‘Intergenerational Mobility and Education in the Next Generation’, a mimeo, who show that the link between family income and GCSE achievement was weakening. It claimed that ‘These findings, therefore, suggest that family background will have less of an impact on the income of these children when they reach adulthood, than those born in 1970 - they are likely to experience higher social mobility’.⁹ Of course the retrospective measured association says nothing whatsoever about future social mobility in what is likely to be a very different context. Basing the claim on an unpublished mimeo is itself an issue. This claim was then widely publicized in press releases. Government departments are great ones for the selective presentation and interpretation of material.

⁹ Cabinet Office, 2008, *Getting on, getting ahead*, <http://www.cabinetoffice.gov.uk/media/66447/gettingon.pdf>

Researchers are under constant pressure to compromise their findings. We have experienced that kind of pressure ourselves, including not just the misrepresentation of research data in press releases but even the alteration of factual data in a report between submission and publication. We are gravely concerned about the way that some recent reports have presented their findings. An example might be the evaluation of Pathways to Work, one of the central planks of the government's welfare reform programme. This purports to show that Pathways to Work improves the rate of return to work of people on Incapacity Benefit. To accept their findings, you would need to accept that it is reasonable to count people as "in work" when they are working for 1-16 hours per week, previously permitted under IB rules (table 5.1, p 49); that it is justifiable to claim success on the basis of some of the cohorts when it is not reflected in others (pp 43-45); and that 10% is a legitimate test of statistical significance (p 48 footnote).¹⁰ The SPA's response has not been to condemn the way that research is being undermined, or to defend the academic freedom which is fundamental to independent thought. On the contrary, it seems to think subservience to research funders is a proper part of its formal statement of ethical practice. This is almost the opposite of a legitimate ethical position.

There are further issues when the work being done relates to consultation and empowerment. Some of us may be cynical about consultation – Ambrose Bierce in *The Devil's Dictionary* defined the verb consult as “to get people to disagree with a decision which has already been made” – but a very large part of ‘social administration’ is concerned with giving people a voice. The processes of governance conducted in relation to key issues such as school re-organization, spatial planning, and health service re-organization, require public consultation which are carried out primarily through processes of social research. Much of this work is farmed out to private sector for profit consultancies who have a vested interest in delivering the results which the proponents of particular schemes want to receive. However, much of it is also carried out by academics in University departments on a contractual basis. Some of the work done is simply dreadful. Quantitative findings are generally meaningless - they are seldom derived from representative samples – but that is not what consultation is supposed to be about. The use of structured questions with closed sets of pre-coded options for answers limits, and potentially negates, the purpose of giving people a voice. In ethical terms, however, the problem is more than just being about bad practice. The duty which researchers have is not just a duty to the funders; there are higher duties, to civil society and the public which is engaged in consultation, and the processes of governance which the researcher is contributing to.

5. Research ethics for practice

While it is understandable that the SPA should have started with research ethics, because that is the most closely regulated field, social policy is not just about “research” in the conventional sense. Social policy has always been an applied subject, closely linked with practice. It is difficult to distinguish consultancy, evaluation, engagement with practice or continuous learning from “research” in any meaningful sense. Social Policy is most emphatically not just about the advancement

¹⁰ H Bewley, R Dorsett, G Haile, 2007, The impact of Pathways to Work, Department for Work and Pensions, http://www.dwp.gov.uk/asd/asd5/report_abstracts/rr_abstracts/rra_435.asp

of knowledge. The ethical context of Social Policy is shaped not just by the specific demands of research projects, but more generally by the implications of practical engagement. There is obviously considerable scope for difference about what the moral implications of work in Social Policy might be, but there are very few people in the field who would not accept the need to consider the relationship of their work to other moral principles.

There are three main classes. The first, which is implied by the principle of beneficence, is to consider the implications of their work for policy. It is hard to imagine that anyone in the field of Social Policy would consider their work to be pure science, of a kind which others may apply as they please, and for which others must take responsibility. The injunction in the SPA guidelines not to sacrifice people in the pursuit of knowledge seems to be based on a different kind of subject entirely.

The second is a commitment to welfare. Even if some of us try to approach policy without political affiliations or allegiances, it is hard to think of Social Policy as if it was neutral between all political positions. Most of its practitioners are committed to public services; many have worked in them. Few of us are predominantly individualist, because that is difficult to reconcile with a primary focus on collective services.

Third, there are some general principles that most people in social policy would subscribe to, such as opposition to racism, respect for humanity and human rights - and we should not imagine that everyone else would. The American Society for Public Administration's Code of Ethics states these as general principles:

- serve the public interest
- uphold the law, including “constitutional principles of equality, fairness, representativeness, responsiveness and due process”;
- demonstrate personal integrity
- promote ethical organizations, and
- strive for professional excellence.¹¹

If few people working in Social Policy would not subscribe to similar principles, it is not because they are not controversial - principles of equality, fairness, representativeness and responsiveness certainly can be. It is rather that Social Policy is done for a purpose, that there is a general commitment to the improvement of public services, and even if there are disagreements about what this might imply, there is a common sense of many rules of engagement with practice.

6. Speaking the truth to power

Social policy research has at its core a critical role. Part of the work of social policy is to hold governments accountable for their actions, and that is done whether or not the governments consent to it. The evaluation of public policy is not a process that has ethically to be negotiated with the government; on the contrary, it is would be unethical for governments to insist on negotiation and compromise that is unethical. Social policy researchers have, in the Quaker phrase, to “speak truth to power”.

¹¹ American Society for Public Administration, 2005, ASPA's Code of Ethics, http://www.aspanet.org/scriptcontent/index_codeofethics.cfm

Speaking truth to power is not enough. Knowledge is a necessary condition of power; it is not a sufficient one. We need not just to say what is true, but to act on it. We have to think about agency and therefore about audiences with the potential for agency. The issues are nowhere raised in the SPA statement.

Knowing imposes an obligation to act. The idea of praxis originates in a formal sense with Aristotle but is particularly associated with Marx and with those influenced by him. These include critical theory and the work of Freire. Of course much critical theory is merely theory, and we can leave post-modernist variants of it to practice the interesting art of fundamental self insertion in search of diurnal illumination, but the tradition both describes a commitment in the twentieth century and provides much of the vocabulary of contemporary social interventions. Words like dialogue, participatory research, and above all else “empowerment” all come directly from Freire’s lexicon (although one might power a Favela from the poor man rotating in his grave over the misuses of the latter in particular).

Praxis is not an easy issue. Even in a liberal conception of the status of knowledge, covered in terms of its production and dissemination by Gramscii’s conception of the role of the traditional as opposed to organic intellectual, then we have to consider whether simple demonstration of what is true is ever enough. The production of knowledge calls for more, ethically, than knowledge alone. ‘The philosophers have only interpreted the world in various ways – the point, however, is to change it’.¹²

Let us set this in contemporary context. In a most interesting piece May has observed that:

‘The state in contemporary Britain is increasingly characterized by new kinds of reflexivity, mediated through systems and institutions of technical expertise – in which policy rooted in *evidence* [original emphasis] is central to its strategic practices, and thus to political discourse. These are expressed in many ways, but involve a central shift towards the primacy of (largely quantitative) knowledge as the foundation for an increasingly active and managerial model of state intervention across a range of policy fields. The emergence of this imperative towards *evidence-based* (original emphasis) policy in the final decades of the twentieth century is one important ideological feature of the apparently post-ideological character of contemporary British politics. In the British case this has involved the rapid development of policy mechanisms and agencies through which this work can be effectively delegated to the Academy. ... One outcome of this is that sociologists might now find themselves among the outsourced civil servants of the evidence based state. This is why political contests about methods are important.’¹³

In other words the products of social scientific research – May refers to sociology only but we can properly generalize his comment – are inherently political because they

¹² Karl Marx, Thesis XI on Feuerbach

¹³ C May, 2005, Methodological pluralism, British sociology and the evidence based state, *Sociology* 2005 39 3 pp. 526-7

operate in a context where politics is asserted to be about neither competing material interests nor about alternative ideological visions of the character of desirable futures, but rather is concerned with technical competency in the achievement of consensual social goals. (We might note that at the time of writing consensus may be under serious threat and that issues of character, which are certainly related to the background to the collapse of that consensus, are also on the agenda.) It is useful to set this in relation to what Crouch has described as 'post-democracy'.¹⁴

'Under this model, while elections certainly exist and can change governments, public electoral debate is a tightly controlled spectacle, managed by rival teams of professionals expert in the techniques of persuasion, and considering a small range of issues selected by those teams. The mass of citizens plays a passive, quiescent, even apathetic part, responding only to the signals given to them. Behind this spectacle of the electoral game politics is really shaped in private by interaction between elected governments and elites which overwhelmingly represent business interests.'¹⁵

In this context we might consider that the key role of the products of social science for governments in office is to continually assert the success of policies and interventions at all levels and in all contexts. All is alright and, moreover, everything is getting better all the time. If we say anything else then we create problems. That might seem to be an ethical necessity of the most minimal kind, but the insertion of maintaining cosy relationships with funders into an ethics statement is profoundly antithetical to our general responsibility not only to speak truth to those with power, but to speak uncomfortable truth very loudly indeed.

7. Do the SPA guidelines matter?

Most practising researchers will ignore the SPA's guidelines, or cherry-pick them so that they can legitimate their activity. It is common enough in research applications to cite any code of guidance that happens to be convenient: researchers are liable to flit from the SRA, to the BSA, to RESPECT, to University rules, according to the project they are doing and the most effective way of presenting their work.

If that was the whole story, these guidelines would not matter; but it is not the whole story. Despite the aspirations of the document's preamble, and the protestations of the SPA committee, these are not going to be applied as flexible guidelines. Research ethics has become a central element in research governance – for example, the ESRC clearly identifies its Research Ethics Framework with governance.¹⁶ Hammersley argues that Research Ethics Committees are applying ethics codes literally, in a way that verges on the unethical – unable to address principles in context, and failing to identify ethical conflicts.¹⁷ RECs are looking for clear, transparent rules, and that is what the SPA, whether it realises it or not, is giving them. This is the environment we are now working in, and one of the central tests of a scheme of this sort is how it will stand up to scrutiny in practice. Unfortunately, the rules which the SPA is introducing

¹⁴ Crouch, C. 2000 *Coping with post-democracy* London: Fabian Society

¹⁵ Crouch, 2000, p 2

¹⁶ Economic and Social Research Council, 2005

¹⁷ M Hammersley, 2006, *Are ethical committees ethical?*, *Qualitative Researcher*, Issue 2, pp 3-7, at http://www.cardiff.ac.uk/socsi/qualiti/QR_Issue2_06.pdf.

are generally the wrong rules. We needed guidelines for social policy because we needed to be able to counterbalance principles that were relevant to Social Policy against the presumptions embedded in other codes. What they have done instead is to reinforce the idea that critical work, engaging with public policy, is liable to be unethical. From the perspective of research in Social Policy, then, the guidelines fail as completely as it is possible for them to fail.