

# Procedure for obtaining ethics clearance for class-based research conducted as part of a course<sup>1</sup>

## Ethics Committee Faculty of Humanities University of Amsterdam

### Introduction

All research at the Faculty of Humanities involving human participants (tests, questionnaires, interviews, observations) and/or the processing of personal data, including education-related research, needs to be reviewed and approved by the Ethics Committee.

The Ethics Committee reviews each individual research project involving human participants and/or personal data and ascertains that Ethics and GDPR standards are met. The research projects need to be approved by the Ethics Committee **before** the research commences.

When a research project does not involve participants and/or personal data, applying for approval by the Ethics Committee will not be necessary.

### Exemption for class-based education-related research

For a number of degree programs at the Faculty of Humanities students are required to carry out research projects that involve human participants as part of a course during their studies.

On the 18<sup>th</sup> of July 2023, the Faculty Board decided, as recommended by the Ethics Committee, to simplify the approval procedure for research conducted as part of a course. Henceforth teachers are allowed, under strict conditions, to submit an umbrella application instead of individual applications for each separate research project.

The conditions for an umbrella application are:

- Participants are legally competent and 16 years or older;
- Participants do not belong to a vulnerable group;
- There is no deception; no possibility of discomfort or harmful effects;
- There is no risk of chance findings;
- There are no special personal data processed. (Special personal data are: religion or belief, race / ethnic background, political preference, health, sexual orientation, biometric data, genetic data, trade union membership, criminal history);
- The methods of participant selection and of the research are standard within the discipline;
- The standard forms are used for the information brochure and the consent forms.

The teacher submits well in time the umbrella application for approval of the education-based research within a course, including the templates of the information brochure and consent form, to the Ethics Committee. The teacher indicates the topics of the research projects, which methods will be used and what selection criteria will apply to the research participants. The teacher fills out all necessary information in the Research Management Services portal relating to ethics and privacy protection (GDPR).

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<sup>1</sup> Revised version of the Procedure for obtaining ethics clearance for class-based research conducted as part of a Bachelor course established on 20 October 2020.

When the umbrella application has been approved, the teacher is responsible for checking the students' research proposals, as well as the information brochures and consent forms of the students. The umbrella research proposal and the templates for information brochure and consent form need to be followed strictly when adapting the formulations in the forms that will be handed out to the participants to the specific research projects.

The teacher instructs the students in matters of ethics and GDPR in research (see attached Ethics & GDPR instructions), such as how students store privacy-sensitive information (e.g. the mandatory use of encrypted USB-sticks/laptops) and to remove all personal information from their computers and phones as soon as the research has been completed.

In their final report, students are to report on how they complied with the Ethics and GDPR guidelines and declare that they have deleted all personal information from their computer or phone after they have completed their research.

**Important note:** If the data collected during the class will be used for a student's thesis, the Ethics Approval is only valid for the data collected during the course. To collect additional data for the thesis project, an individual application needs to be submitted to the Ethics Committee.

# Ethics & GDPR Instruction

Always check for the latest version on <https://aihr.uva.nl/about-aihr/ethics-committee/ethics-committee.html>

## Introduction

The Ethics Committee of the Faculty of Humanities monitors the criteria for ethical conduct for all the research at the Faculty of Humanities in which human participants take part.

When you work with participants for your research, e.g. when you conduct interviews or questionnaires or do participant observations, and/or when you work with *personal data*, i.e. information that can be traced back to a person, you need approval of the Ethics Committee before you start your research.

Moreover, when you work with *personal data*, the GDPR applies and in order to work GDPR-proof – and therefore ethically – there are certain conditions that you must meet.

## Ethics

The following issues are important when you work with human participants:

- Participants: are you working with mentally competent adults or with a vulnerable group (<16, mentally incompetent, socially vulnerable)?
- Selection method: could participants possibly feel pressure (socially, financially) to participate?
- Voluntary participation: can participants freely choose to participate and always stop participating without adverse consequences?
- Harmful effects: could participation, for example, have a negative effect on your job if your boss hears about it?
- Unexpected findings: what will you do if, for example, it shows up on a scan that a participant might have a tumor or if you inadvertently find out that someone was involved in something illegal?
- Uncomfortable research: are participants, for example, asked about emotional memories or will they have uncomfortable electrodes on their head (fx. EEG)?
- Anonymity and privacy: will the participants remain anonymous or are pseudonyms used or does the participant agree to disclosing his/her identity?
- Deception: sometimes you can't reveal what the research is about because it might influence the results. In those situations you have to debrief the participants directly after the research has finished.
- Information brochure and informed consent form: information and consent are essential in research with participants! The point is that participants must always know in advance exactly what will happen and what exactly they consent to.

## GDPR

### What is the GDPR?

The General Data Protection Regulation is a European regulation that standardises the rules for the processing of personal data by private individuals, companies and public authorities throughout the European Union. With the GDPR, the European Union has one common privacy law. The GDPR has been in force as of 25 May 2018.

### What is personal data?

Personal data is all data that can be traced back to a natural person directly or indirectly, alone or in combination. This data can consist of text, images and sound. The definition "natural person" excludes legal persons and deceased persons. Personal data are:

- Name
- Address

- Telephone number
- Email
- Age / date of birth
- Gender
- Education
- Profession
- IP address
- Facial images / audio / video recordings

Additionally there are special personal data. This is very sensitive information that you must handle with the utmost care.

- Religion or belief
- Race / ethnic background
- Political preference
- Health
- Sexual orientation
- Biometric data
- Genetic data
- Trade union membership
- Criminal history

If you are going to use special personal data, please contact the Data Steward ([datasteward-fgw@uva.nl](mailto:datasteward-fgw@uva.nl)) for additional measures. If you are doing research with vulnerable groups and/or processing special personal data, possibly a Data Protection Impact Assessment (DPIA) is carried out with you and the privacy officer. In this assessment the right measures to protect the privacy of your participants will be determined.

Then there is the BSN. This may only be used in situations stated by law. Research does not fall under this, in other words you may never ask your participants for a BSN for your research.

### **What exactly does “processing personal data” mean?**

The “processing” of personal data includes everything that you as a researcher do with that data or have someone else do for you: download, save, store, analyse, anonymise, show to others, publish.

### **Can I work with personal data and if so, how?**

Before you start working with personal data, you must consider two important questions:

1. Am I allowed to process personal data?
2. And if so, how do I process personal data in a proper manner?

For step 1 you need:

- A. a **specific purpose** for the processing (fx.: requesting an email address to be able to send concrete information to a participant) and
- B. a (legal) **basis** for the processing.

The legal basis for research is Informed consent or, in a *very exceptional case*, Public Interest (the interest of the UvA to carry out her official task (scientific research) is weighed against the invasion of the participant’s privacy). Please contact the privacy officer ([privacy-fgw@uva.nl](mailto:privacy-fgw@uva.nl)) if you would like to use the legal base public interest.

When you ask for consent from your participants, it is compulsory to inform them properly by means of an information brochure about your research so that they know exactly what it is they are consenting to. Active approval (so no pre-ticked boxes!) is required for:

- participation (also with anonymous research)
- audio and video recordings
- sharing personal data with third parties

**You are only allowed to process personal information if you have both specific purpose and a legal basis.**

If the conditions in step 1 are fulfilled, you can move on to step 2 in which the proper processing of the personal data is specified. This includes:

- Do not request more data than is necessary for the purpose  
Dataminimisation; need to know NOT nice to know.
- Store data securely
  - ensure a safe storage place – preferably UvA storage and in the cloud (no Dropbox or GoogleDrive), delete data from mobile devices as quickly as possible;
  - use encryption (fx. Verascrypt) in addition to a password, especially on mobile devices;
  - separate contact information from research data;
  - anonymise your data as soon as possible (data is anonymized when the link with the participant is irrevocably broken - even the researcher cannot retrace the participants any longer!) or if that is not possible, pseudonymise your data (the participant can be found by using a key – use encryption for the file containing the pseudonymization key);
- Properly arrange access to the data (authorisations);
- Determine concrete retention periods (for personal data: as short as possible, delete as soon as they are no longer needed (data minimisation), for anonymous data: the standard retention period in the Humanities is 10 years);
- Draw up processing agreements if you share personal data with others or have them processed by others. If you work with student assistants let them sign a non-disclosure agreement.

## Considerations when using personal data



### In a nutshell

If you are planning to do research with participants, prior approval by the Ethics Committee is required. Research involving the processing of personal data is subject to the GDPR and should be registered. Both can be arranged through the Research Management Services (RMS) portal. The RMS portal can be found at <https://rms.uva.nl/servicedesk/customer/portal/6>. You can log in with your UvAnetID and 2-factor-authentication. There you can create a new project and then answer the questions in the Ethics Review and the Privacy Protection Review.

**BA and MA students** cannot submit an application themselves. The teacher/supervisor is the responsible researcher and he/she must submit the application. However the student can prepare the application. The one who registered the project in the portal, this can be the teacher/supervisor

or the student, adds the other person to the project, so that the other can also see, edit and submit the project. Note that a person needs to have logged in to RMS at least once before they can be added to a project.

As soon as the project is registered, the student can fill out the Ethics Review and the Privacy Protection Review and upload the information brochure and informed consent form. When that is done the teacher/supervisor checks the application and, if all is to his/her liking, submits it.

To avoid delay, it is important to adjust the standard forms at the [website of the Ethics Committee](#) to the project and align them in terms of content to each other (fx. don't use the term pseudonymization in one form and anonymization in the other). An incomplete application or an application submitted by a student cannot be reviewed by the Ethics Committee and will be sent back.

For further information:

[Ethics Committee Faculty of Humanities](#)  
[Research Data Management at AIHR](#)

Further information for staff members:

[The GDPR and research at the UvA](#)  
[FAQ GDPR and research](#)  
[FAQ GDPR and social media research](#)