

NESH



Oslo, November 30, 2020

Response to consultation on NESH guidelines from the Peace Research Institute Oslo (PRIO)

PRIO is grateful for the opportunity to provide input to the revision of the NESH guidelines, which play an important role in ensuring high standards of research conduct and integrity amongst Norwegian researchers and research institutions.

PRIO is largely positively disposed towards the revised guidelines, and feel that they improve upon the previous edition of the guidelines in various respects. We do, however, have a number of suggestions and critical comments. These reflect both PRIO researchers' diverse disciplinary and methodological competence, and common international orientation.

General remarks

As a whole, the guidelines seem very much to presume that most of the research to which the guidelines will apply takes place in a domestic context, without international collaboration. The international dimension plays a role in some places in the document, but largely as an exception. It would be beneficial if the international character of research were reflected throughout the document.

The revised guidelines rightly emphasize the responsibility of the project leader. This is one area in which a greater attentiveness to international collaboration is needed. Where project participants are based in different countries, it is not inconceivable that conflicts may arise between different procedures for and perspectives on dealing with ethical dilemmas. Guidance on negotiating such 'culture clashes' within diverse research teams would be welcome.

Peace Research
Institute Oslo (PRIO)
PO Box 9229 Grønland
NO-0134 Oslo, Norway
Enterprise number
NO 847 353 732 MVA

Telephone +47 22 54 77 00
www.prio.org
Visiting address
Hausmanns gate 3
NO-0186 Oslo, Norway

Bank Account 8200 01 44904
IBAN NO96 8200 0144 904
BIC/Swift code DNBANOKK
DnB Bank ASA
NO-0021 Oslo, Norway

Forskningens normer og verdier

The second paragraph of this section refers to “internal and external norms”, but this distinction is not clearly defined.

Ansaret for forskningsetikken

In the final paragraph of this section, it is stated that researchers should not participate in projects that are not ethically defensible. However, given the complexities of the ethical dimensions of research, we can easily conceive situations in which the ethical defensibility of a given project is not clear cut. In such cases, the researcher’s departure from the project may itself be ethically problematic, if it were for example to jeopardize agreements with the funder and partners. It may, therefore, be advisable to include some language in this section suggesting involving a third party: if the researcher suspects that a project is ethically problematic, then they should, e.g., notify the project leader, report to NSD and/or NESH etc. Simply encouraging researchers to leave a project without this sort of third party oversight may solve some ethical issues while generating others.

9. Deling av forskningsdata

It would be beneficial if the final paragraph of this section acknowledged more explicitly cases where data are sensitive, for example where they are associated with risks to informants.

In addition, the section as a whole focuses primarily on risks in large-*n* studies. However, the risk of retrospective identification may be just as great in small-*n* qualitative research, if not greater.

In general, the discussion of data sharing would benefit from more fully addressing the challenges associated with qualitative and/or small sample data.

B. Forskningsdeltagere

It is our experience, conducting research in a variety of localities and in conflict and post-conflict settings, that the insistence on documented, informed consent by default (although some exceptions are acknowledged) is problematic. In many contexts, carrying signed documents from which concrete individuals can be identified is a security risk, and recording consent is likely to undermine research participants’ trust in the researcher.

It can on occasion be difficult to make the case for these kinds of considerations, which are ultimately of a research-ethical nature, to NSD, whose mandate is a narrower concern with data protection. As such, it would be welcome if NESH could – rather than

formulating a default rule indicating the need for documented, informed consent – more explicitly acknowledge the ethical dilemmas associated with this issue. It would also be useful in this context to include some examples of ways to resolve common dilemmas. EU collaborative projects, for example, now have a standard solution that accepts that the research records informed consent (including time and place but no name) based on a comprehensive consent letter, which participants get a chance to read through.

26. Andres verdier og handlingsmotiver

We wonder whether this section establishes too high a bar for attributing to participants in research non-meritorious motives or motives other than those individuals themselves claim to have. So strongly formulated, this principle may risk implying that critical research is ethically questionable.

E. Forskningsformidling

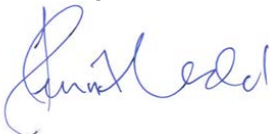
The focus on dissemination and public engagement as an ethical responsibility is welcome and important, particularly given today's polarized debates about migration, COVID-19 etc.

Appendiks med supplerende administrativ informasjon om NESH, FEK osv.

The research ethics landscape is increasingly complicated, with a number of compulsory approvals and reporting procedures in place and it is often difficult to know who does what, on what basis, and with what consequences. The ambition to include an appendix mapping this landscape is, therefore, laudable and warmly welcomed.

A useful measure for which NESH might take responsibility is the development of a 'resource bank', clearly defining who does what and providing examples of best practice, templates etc. Whether or not this is beyond the scope of the planned appendix remains to be seen, but something of this ilk would be useful to have.

Best regards,



Henrik Urdal
Director, PRIO