Document generated on 03/29/2024 6:54 a.m.

Canadian Journal of Bioethics
Revue canadienne de bioéthique

Being Ethical in a Context with Limited Ethics Oversight: A Study on Flooding Risk Management by Local Governments in India

Nidhi Subramanyam

Volume 1, Number 1, 2018

Ethics and International Development Research
Éthique et recherche en développement international

URI: https://id.erudit.org/iderudit/1058314ar
DOI: https://doi.org/10.7202/1058314ar

See table of contents

Publisher(s)

Programmes de bioéthique, École de santé publique de l'Université de Montréal

ISSN

2561-4665 (digital)

Explore this journal

Cite this document

Subramanyam, N. (2018). Being Ethical in a Context with Limited Ethics Oversight: A Study on Flooding Risk Management by Local Governments in India. *Canadian Journal of Bioethics / Revue canadienne de bioéthique*, *1*(1), 37–39. https://doi.org/10.7202/1058314ar

Article abstract

This case describes and reflects on ethical questions that we faced as we obtained permission to conduct research on local government policy implementation processes in India, which has no legal guidelines or REBs for ethical oversight of social science research. We focus on questions of voluntary consent and exposure to unintended risks, where, in this case, staff in local governments might feel coerced to participate based on the institutional permission to conduct research granted by their superiors.

All Rights Reserved © Nidhi Subramanyam, 2018

This document is protected by copyright law. Use of the services of Érudit (including reproduction) is subject to its terms and conditions, which can be viewed online.

https://apropos.erudit.org/en/users/policy-on-use/

This article is disseminated and preserved by Érudit.

Érudit is a non-profit inter-university consortium of the Université de Montréal, Université Laval, and the Université du Québec à Montréal. Its mission is to promote and disseminate research.

https://www.erudit.org/en/

Canadian Journal of Bioethics
Revue canadienne de bioéthique

ÉTUDE DE CAS / CASE STUDY

Being Ethical in a Context with Limited Ethics Oversight: A Study on Flooding Risk Management by Local Governments in India

Nidhi Subramanyam[1]

Résumé
Cette étude de cas décrit et illustre les questions éthiques auxquelles nous avons été confrontées lorsque nous avons obtenu l'autorisation de mener des recherches sur les processus de mise en œuvre des politiques du gouvernement local en Inde, qui n'a pas de lignes directrices légales ou de CÉR pour la supervision éthique de la recherche en sciences sociales. Nous nous concentrons sur les questions de consentement volontaire et d'exposition à des risques involontaires, où, dans cette étude de cas, le personnel de gouvernements locaux pourrait se sentir contraint de participer compte tenu de l'autorisation institutionnelle de mener des recherches accordées par leurs supérieurs.

Mots clés
politique gouvernementale locale, développement international, éthique de la recherche, Inde

Abstract
This case describes and reflects on ethical questions that we faced as we obtained permission to conduct research on local government policy implementation processes in India, which has no legal guidelines or REBs for ethical oversight of social science research. We focus on questions of voluntary consent and exposure to unintended risks, where, in this case, staff in local governments might feel coerced to participate based on the institutional permission to conduct research granted by their superiors.

Keywords
local government policy, international development, research ethics, India

Introduction

Local and regional governments in international settings require researchers to seek permission and institutional approval prior to permitting ethnographic research on their daily workings and policies. Such permissions and approvals may or may not fall within the purview of research ethics boards (REBs) in the researcher's home country. Although home country REBs are increasingly attentive to sociocultural influences on the comprehension of risk and the consent process or differences in power between foreign researchers and participants [1], they may not always be aware of procedures surrounding institutional (or governmental) permission to conduct international research at various levels. In the absence of a system for local ethics review (whether at the national or regional level), researchers might be unaware of procedural requirements such as institutional permission and approval until they arrive in the field, which is often after obtaining ethics approval from their home country REB.

In addition to procedural requirements, researchers and home country REBs also need to consider the conditions under which individual participants within the local or regional governments provide consent. They also need to be attentive to the unintended risks that consenting participants might be exposed to during the study. Many of these local governments are hierarchical organizations; the permission to conduct research from superiors (not to be confused with local research ethics approval) could coerce staff and employees to participate in the research study. As government decision-making and policies tend to be political, participants might inadvertently provide responses critical of the government institutions and/or those in power. Thus, through the study, the researcher might subject consenting participants to unintended risks such as reputational damage or institutional stigmatization, should the critical findings be published.

The objectives of this case study are to draw attention to and reflect on the following issues: lack of information on procedures to conduct research on government processes in an international setting with limited local ethics oversight; and the subsequent process of seeking voluntary and autonomous consent in a hierarchical organizational context where the permission to conduct research might result in participant coercion and exposure to unintended risks. In conclusion, I discuss some ethical questions presented by these issues.

The case

This case describes ethical issues that I confronted while studying flooding disaster management efforts by two municipalities in the Mumbai Metropolitan Region in India. The case is one part of a larger research project that I undertook when I was employed with Canada's International Development Research Centre (IDRC). The protocol involved semi-structured interviews with local government staff and officials about their perceptions of flooding risks within their municipalities, and the various risk-reducing measures they undertook – especially in informal settlements that do not have 'legal' status (see [2] for additional details).

Correspondance / Correspondence: Nidhi Subramanyam, ns684@cornell.edu

ISSN 2561-4665

2018 N Subramanyam. Creative Commons Attribution 4.0 International License

Les éditeurs suivront les recommandations et les procédures décrites dans le Code of Conduct and Best Practice Guidelines for Journal Editors de COPE. Plus précisément, ils travaillent pour s'assurer des plus hautes normes éthiques de la publication, y compris l'identification et la gestion des conflits d'intérêts (pour les éditeurs et pour les auteurs), la juste évaluation des manuscrits et la publication de manuscrits qui répondent aux normes d'excellence de la revue.

The editors follow the recommendations and procedures outlined in the COPE Code of Conduct and Best Practice Guidelines for Journal Editors. Specifically, the editors will work to ensure the highest ethical standards of publication, including: the identification and management of conflicts of interest (for editors and for authors), the fair evaluation of manuscripts, and the publication of manuscripts that meet the journal's standards of excellence.

The Advisory Committee on Research Ethics (ACRE) at IDRC reviewed and approved the study protocol. I did not obtain local approval from an Indian REB since it is not mandatory for social science research in India. To our knowledge and based on discussions with peers in the region, there are no REBs or national ethical guidelines for social science research in India. The 200-odd REBs that exist focus on biomedical research and clinical trials involving human subjects [3,4]. A caveat is necessary: the municipalities that I studied are not representative of the variety of local and regional governments in India. Additional research is required to understand how the procedural requirements to obtain permissions for the study described here vary across countries' agencies and regions.

Obtaining local 'approval' and 'consent' on the ground

When we approached local governments for data or requests for interviews, no one asked us for our research protocol or consent forms. This was not surprising since REBs or consent forms are not inherent to the research culture in India. Additionally, Indian governments are required to make some kinds of data publicly available. Instead, government officials demanded a letter of introduction from my supervisor and organization establishing my credentials and the nature and purpose of my research.

Article 3.6 of the Canadian *Tri-Council Policy Statement: Ethical Conduct for Research Involving Humans* (TCPS2) states that researchers do not need to seek an organization's permission to proceed with their proposed protocol if it is a critical inquiry into a public policy or its practice [5]. However, we submitted the required letter of introduction and sought permission from the local government before proceeding with our protocol. We obtained this permission to instill trust and gain access to staff and officials, who, in the absence of this permission letter from the higher authority of the municipal commissioner (or assistant commissioner) for the local government, would not share with us their perspectives on disaster policy implementation and governance. The 'approval,' that is, permission to conduct research which took about a week, was an internal memo directing employees to cooperate and share the relevant data. Unlike ACRE's research ethics approval process, it did not entail a scrutiny of our research protocol or methods.

The local government's permission to conduct research enabled to access various sources of secondary data in the form of statistics, maps, and policy documents. Several officials were also 'willing' to discuss the process of disaster management policy formulation and implementation. We were concerned that institutional approval from the local government might interfere with the consent process and prevent us from adhering to the core ethical principles of the TCPS2 (respect for persons, concern for welfare and justice) [5] while interviewing staff and officials. In Indian government institutions – like the ones we studied – where hierarchies are strongly inscribed and adhered to, consent may not be fully voluntary or autonomous as employees might feel compelled to participate in order to comply with their superior's orders. We also wanted to protect our interviewees from the potential risks of reputational damage and institutional stigmatization should they inadvertently reveal politically sensitive information about the policy making or implementation process.

In conformance with our protocol, we disclosed the purpose of our research and sought the interviewees' free, informed, and voluntary consent. We clarified that we would not report anyone for their unwillingness to participate in the interview or share personal reflections on the policies. We made it clear they had the option to be interviewed at their convenience, and opt out of sensitive questions – which a few did either by going "off-the-record," digressing or remaining silent. We also noted that publications or reports would not identify anyone by name or designation nor, since we avoided recordings, would interview notes be shared with anyone outside the research team. However, we did not explicitly state that resulting publications might be critical of local government policy as has been the case [2] since we were operating from the position of highlighting the impacts of policies on marginalized communities living in informal settlements in flood-prone areas.

This case, thus, exemplifies two main ethics-related issues that we encountered as we tried to apply a protocol reviewed through the process coordinated by ACRE in the Indian context with different institutional hierarchies and procedures and no oversight from local REBs on the ethical conduct of social science research. These issues are first, non-awareness of the procedural requirements to obtain organizational permission prior to conducting research, and second, seeking voluntary consent from participants who may have felt compelled to participate based on organizational permission without adequately comprehending the potential risks.

Questions to consider

1. Would having a system for local ethics oversight have alerted the researchers about local procedural requirements or permissions that are required before commencing research in government institutions? In what ways could a local REB have helped the researchers to design and implement the consent process to account for institutional compulsions that might impede voluntary and autonomous consent, and mitigate potential risks to participants?
2. What are some resources or infrastructure that could augment ACRE's organizational capacity? For instance, could ACRE compensate for the lack of local ethics guidelines or oversight by hiring an expert who is familiar with research procedures in the Indian context? More pragmatically, should ACRE demand letters permitting research prior to approving the protocol in international settings with no local REBs?
3. Who is responsible for enforcing ethical considerations in the Indian context with no local REBs or ethical guidelines for social science research – ACRE (a distant ethics committee with no legal power in India), the local government

administrator providing permission, a local university that is aware of the research culture in the region, or the self-guided researcher required to adhere to ethical standards? What are each of their limitations?

4. Researchers studying international development must interpret the core ethical principles of respect for persons and justice within the context of their study [6]. For a researcher acting from the position of social justice for a marginalized group, what are the ethical and scientific tradeoffs between protecting government participants from risks versus generating critical knowledge that might benefit the marginalized group?

Remerciements
J'aimerais remercier le Centre de recherches pour le développement international du Canada (CRDI) pour un prix de recherche (subvention du Centre n° 107759-99906501-034) qui a financé l'étude en rapport avec cette étude de cas. Je suis reconnaissant aux éditeurs de ce numéro spécial pour leurs commentaires judicieux et constructifs. Toutes erreurs ou omissions sont les miennes. Les opinions exprimées dans cet ouvrage sont celles de l'auteur et ne représentent pas nécessairement celles du CRDI ou de son conseil d'administration.

Acknowledgements
I would like to thank Canada's International Development Research Centre (IDRC) for a Research Award (Centre grant #107759-99906501-034) that funded the study informing this case. I am grateful to the editors of this special issue for their useful and constructive comments. Any errors or omissions are my own. The views expressed in this work are those of the author and do not necessarily represent those of IDRC or its Board of Governors.

Conflit d'intérêts
Aucun déclaré

Conflicts of Interest
None to declare

Édition/Editor: Marleen Eijkholt

Affiliations
[1] Department of City and Regional Planning, Cornell University, USA

Reçu/Received: 29 Nov 2016 **Publié/Published:** 15 Feb 2018

References

1. Marshall P A. Informed consent in international health research. Journal of Empirical Research on Human Research Ethics. 2006;1(1):25-41.
2. Subramanyam N, MacAlister C. Governance of flooding risks in informal settlements in satellite cities in the Mumbai region. South Asian Water Studies (SAWAS). 2016;5(3):12-27.
3. Indian Council for Medical Research. Ethical Guidelines for Biomedical Research on Human Participants. New Delhi, 2006.
4. Kadam R, Karandikar S. Ethics committees in India: Facing the challenges! Perspect Clin Res. 2012; 3(2):50.
5. Canadian Institutes of Health Research, Natural Sciences and Engineering Research Council of Canada, Social Science and Humanities Research Council of Canada. Tri-Council Policy Statement: Ethical Conduct for Research Involving Humans. Ottawa, 2014.
6. Thomas H, Lo Piccolo F. Planning research Ethics. In: Silva EA, Healey P, Harris N, Van den Broeck P, editors. The Routledge Handbook of Planning Research Methods. New York and London: Routledge; 2015. p. 74-83.