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# Behavioural Insight Ethics Policy

## About this policy

### Purpose

Behavioural Insight involves using evidence from scientific disciplines, such as behavioural science, behavioural economics and psychology, to help us better understand why humans think and behave in the way they do. It is often used by Governments and organisations to design policies and services that encourage people to make better decisions for themselves and society.

At RNIB, Behavioural Insight is playing a vital role in helping us deliver our strategic priorities (for more information about our strategic priorities, please read [our strategy and business plan](https://rnib.sharepoint.com/:p:/r/sites/YourRNIB/_layouts/15/Doc.aspx?sourcedoc=%7BCCDD2F8D-8026-4C80-BC07-1AC961F8B613%7D&file=Spring%202022%20Strategy%20Communications%20Presentation.pptx&action=edit&mobileredirect=true&wdLOR=c6EADB7B2-2DAF-4D92-954C-DE14AEAFEA81&cid=a9254a87-0375-4308-836e-67ebc2a8d948)). It is informing the design and delivery of new services, interventions, policies and campaigns that encourage people to change the way they think and behave about sight loss.

There are, however, some ethical considerations that should be taken into account whenever evidence and principles from Behavioural Insight are used to influence people’s decisions and behaviours.

This policy aims to ensure that all staff, volunteers and contractors undertaking work on behalf of RNIB are aware of these ethical considerations and are committed to practise by means of sound ethical conduct whenever they are using Behavioural Insight to shape and inform work being undertaken on behalf of RNIB.

### Benefits of this policy being in place

Ethical risks and issues can broadly be defined as outcomes that result in legal, cultural, economic, psychological or reputational harm to individuals or organisations. It also includes outcomes that create moral controversies.

In the context of Behavioural Insight, there has been a lot of debate in the media about whether it is ethical for Governments and organisations to interfere with how people think and behave. Moreover, some critics have questioned whether it is ethical to utilise certain strategies, such as Nudging, to subtly influence people’s choices and decisions, without necessarily telling them. Critics have particularly been concerned about whether Governments and organisations are using covert and deceitful tactics to manipulate people into making choices and decisions that align with their own interests, rather than the best interest of individuals and society. There are also some questions raised with regards to whether such tactics reduce people’s sense of autonomy and freedom.

Whilst these are all valid ethical concerns, it is also well evidenced that interventions based on Behavioural Insight are more likely to achieve impactful and long-lasting change, with many Governments and organisations successfully using Behavioural Insight to help people make better decisions which benefit themselves and society (e.g. smoking indoors ban, COVID-19 rules and restrictions). It could therefore be argued that, in such cases, it would have been unethical if Governments and organisations had chosen *not* to intervene.

Although this debate is yet to be settled, the general consensus is that Behavioural Insight should only be used by Governments and organisations for the benefit and welfare of individuals, rather than their own interests and agenda. It is therefore important that any organisation which seeks to use Behavioural Insight in their work has clear ethical guidelines and principles in place to mitigate risks around potential abuse and misuse of Behavioural Insight as well as potential backlash from the media or public towards the organisation.

This policy will ensure that staff, volunteers and contractors undertaking work on behalf of RNIB are aware of the ethical issues and risks that might arise when evidence and principles from Behavioural Insight are being used to influence people’s decisions and behaviours.

It will also provide staff, volunteers and contractors undertaking work on behalf of RNIB with a clear set of ethical commitments and procedures they will be expected to adhere to whenever they are using evidence and principles from Behavioural Insight to shape and inform RNIB’s work.

Having this policy in place will mitigate risks around the potential abuse and misuse of Behavioural Insight in RNIB’s work. It will also protect the organisation from potential media and public backlash towards its use of Behavioural Insight in its work.

### Embedding the policy

The Behavioural Insight Unit supports managers and individuals to understand this policy, working with them as required to ensure that ethical commitments and procedures outlined by this policy are adopted into their teams and work practices.

### Risks and Implications

The risk of not following this policy could result in employees, volunteers and contractors undertaking work on behalf of RNIB using evidence and principles from Behavioural Insight in a way that is unethical and, potentially, harmful to others. It can also result in damage to RNIB’s external reputation, as people may think we are taking advantage of them for our own interests and agenda.

### Scope of the policy

This policy applies to all employees, volunteers and contractors undertaking work on behalf of RNIB where Behavioural Insight is being used to influence people’s decisions and behaviours.

This includes any instance where Behavioural Insight has been used to inform the design and delivery of Behaviour Change activities and interventions that encourage people to change the way they think and behave.

### Exceptions to this policy

Any exceptions to this must be approved by the Senior Behavioural Insight Manager.

### Roles and responsibilities

#### Employees, volunteers and contractors

* To adhere to the ethical commitments and procedures outlined in this policy when using evidence and principles from Behavioural Insight to shape and inform Behaviour Change interventions and activities being undertaken on behalf of RNIB.
* To document and be able to demonstrate evidence that individuals with lived experience have been involved in making decisions relating to ethics prior to the launch of any new behaviour change intervention or activity (See [Appendix 1](#_Appendix_1:) for guidance on how to do this).
* To complete an ethics risk assessment form prior to launching any new Behaviour Change activity or intervention based on principles from Behavioural Insight and adhere to the outcomes of this assessment as outlined in the policy procedures (You can find the form on the following link: [Behavioural Insight Ethics Risk Assessment Form](https://forms.office.com/Pages/ResponsePage.aspx?id=fDNFXZLR_EOqWAVVfJFxvDkDxNWzyk5Jj9HztDEeYlxUQ1dYNFU4WjExRVpVQzJKMTBGWVVESUQzMy4u)).

**Behavioural Insight Unit**

* To provide guidance and advice on this policy to employees, volunteers and contractors undertaking work on behalf of RNIB whereby Behavioural Insight will be used to influence the decisions and behaviours of others.
* To regularly monitor all ethics risk assessment forms that have been logged centrally by staff, volunteers or contractors undertaking work on behalf of RNIB for quality assurance purposes.
* To undertake a full ethical review of all Behaviour Change activities and interventions that have a risk of causing harm or discomfort to others (even if this risk is unlikely) and ensure appropriate mitigation strategies have been put in place to minimise this risk of harm or discomfort.

### Definitions

#### Behavioural Insight

Behavioural Insight involves using evidence from scientific disciplines, such as behavioural science, behavioural economics, choice architecture, social psychology and cognitive psychology, to help us better understand why humans think and behave in the way they do. It is often used by Governments and organisations to design policies and services that encourage people to make better decisions for themselves and society.

* **Behavioural science**: a discipline that aims to explain human and animal behaviour.
* **Behavioural economics**: a discipline that aims to explain economic decision-making.
* **Choice architecture**: a discipline that aims to explain how presenting choices in different ways can affect decision-making.
* **Cognitive psychology:** a branch of psychology that aims to explain internal mental processes, including biases in human thinking, perception, memory, attention, language, problem-solving and learning.
* **Social psychology:** a branch of psychology that aims to explain social interactions, including their origins and their effects on the individual.

#### Behaviour Change Activity or Intervention

A Behaviour Change activity or intervention tends to involve using evidence and principles from Behavioural Insight to design and deliver a coordinated sets of activities that seek to change the way people think and behave. These activities may include:

* ‘**Nudging’:** making small and simple changes to the environment to ‘steer’ individuals to make a certain decision, whilst respecting their freedom to choose differently.
* **‘Education’**: increasing people’s knowledge and understanding of how to think and behave differently.
* **‘Persuasion’:** using communication to stimulate people to think and behave differently.
* **‘Incentivisation’:** rewarding people for thinking and behaving differently.
* **‘Restrictions’:** using rules to encourage people to think and behave differently.
* **‘Training’:** imparting skills so people can think and behave differently.
* **‘Enablement’:** increasing people’s means and/or reducing their barriers to behave differently.
* **‘Modelling’:** providing an example for people to aspire to.
* **‘Environmental restructuring’:** encouraging people to think and behave differently by changing their physical and/or social context.
* **‘Coercion’:** Creating an expectation of punishment or cost for not thinking and behaving differently.

## Statements of the Policy

### Commitment to use Behavioural Insight where there are mutual benefits for RNIB and the target audience

RNIB will only apply evidence and principles from Behavioural Insight to circumstances where RNIB and the target audience have an aligned interest and can mutually benefit from a Behaviour Change intervention or activity. RNIB’s interests will always be aligned with the organisation’s ultimate mission: to create a world where people living with sight loss can participate equally.

### Commitment to be truthful

All RNIB activities that utilise evidence and principles from Behavioural Insight will always be built on the truth and will avoid misleading and deceiving the target audience.

### Commitment to respect people’s freedom of choice and autonomy

All activities that utilise evidence and principles from Behavioural Insight will respect the target audience’s autonomy, dignity, freedom of choice and privacy. Activities that subtly ‘steer’ (nudge) people in a particular direction will always offer individuals the freedom to opt-out or choose differently.

### Commitment to avoid harm

All activities that utilise evidence and principles from Behavioural Insight will undergo an internal ethics review process to determine potential risks to others. The potential benefits to society will always outweigh the risk of potential harm.

### Commitment to be open, honest and transparent

Activities that utilise evidence and principles from Behavioural Insight will not be hidden or manipulative. RNIB will always be able to defend their approach, methods and motives to the public in an open, honest and transparent way.

### Commitment to undertake rigorous and ethical evaluations

Activities that utilise evidence and principles from Behavioural Insight will always be evaluated with rigour so that RNIB could monitor and evaluate the extent to which these activities have benefited RNIB and the target audience. All of these evaluations will be designed and implemented in accordance with the Social Research Association’s Research Ethics Guidance ([read here](https://the-sra.org.uk/SRA/Ethics/Research-ethics-guidance/SRA/Ethics/Research-Ethics-Guidance.aspx?hkey=5e809828-fb49-42be-a17e-c95d6cc72da1and)).

## Procedures

To ensure we are practising in line with the ethical commitments outlined in this policy, all Behaviour Change activities and interventions that have been designed using evidence and principles from Behavioural Insight are expected to undergo an internal ethics reviewal process, which involves staff, volunteers and contractors to adhere to the following procedures:

1. Familiarise themselves with the ethical commitments outlined in this policy prior to designing any new Behaviour Change activity or intervention based on evidence and principles from Behavioural Insight.
2. Ensure that a sample of people with lived experience have been involved in making decisions relating to ethics prior to the launch of the activity or intervention (See [Appendix 1](#_Appendix_1:) for guidance on how to do this).
3. Complete an ethics risk assessment form prior to launching any new Behaviour change activity or intervention which will determine whether the proposed activities need to undergo a full ethical review by the Behavioural Insight Unit. These forms will be logged centrally and will be regularly monitored and reviewed by the Behavioural Insight Unit. Ethics Risk Assessment Form. You can find the form on the following link: [Behavioural Insight Ethics Risk Assessment Form](https://forms.office.com/Pages/ResponsePage.aspx?id=fDNFXZLR_EOqWAVVfJFxvDkDxNWzyk5Jj9HztDEeYlxUQ1dYNFU4WjExRVpVQzJKMTBGWVVESUQzMy4u)

## Associated Policies, Procedures, Standards and Guidelines

1. [RNIB’s Framework for using Behavioural Insight](https://rnib.sharepoint.com/:w:/r/sites/InsightHub/_layouts/15/Doc.aspx?sourcedoc=%7BCB93CA91-DEA0-4297-89B4-D01154BA0BD0%7D&file=RNIB%27s%20framework%20for%20using%20Behavioural%20Insight.docx&action=default&mobileredirect=true)
2. [The Social Research Association’s Research Ethics Guidance](https://the-sra.org.uk/SRA/Ethics/Research-ethics-guidance/SRA/Ethics/Research-Ethics-Guidance.aspx?hkey=5e809828-fb49-42be-a17e-c95d6cc72da1and)
3. [Involvement of people with lived experience in ethical decision making](#_Appendix_1:_Involvement)
4. [Behavioural Insight Ethics Risk Assessment Form](https://forms.office.com/Pages/ResponsePage.aspx?id=fDNFXZLR_EOqWAVVfJFxvDkDxNWzyk5Jj9HztDEeYlxUQ1dYNFU4WjExRVpVQzJKMTBGWVVESUQzMy4u)
5. [RNIB’s Data Protection Policy](https://rnib.sharepoint.com/:w:/r/sites/DocumentControl/_layouts/15/Doc.aspx?sourcedoc=%7B1B540F4F-5068-4131-995D-91814114B639%7D&file=Data%20Protection%20Policy.docx&action=default&mobileredirect=true&wdLOR=c72504E79-7AA9-4E7E-AFE4-116362828622&cid=5b29028c-ee25-45c0-8da0-879e4f118589)
6. [RNIB’s Safeguarding Policies, Procedures and Guidance](https://rnib.sharepoint.com/sites/CentralSafeguardingHub/SitePages/Safeguarding-Policies-and-Guidance.aspx)

### Governance and Review

Should an employee, volunteer or contractor undertaking on work behalf of RNIB need further information, guidance and clarification on this policy, or want to report a potential breach, they should directly contact the Senior Behavioural Insight Manager on:

**Email:** [firuze.bertiz@rnib.org.uk](mailto:firuze.bertiz@rnib.org.uk).

**Telephone:** 020 8175 1470

**Post:** RNIB,105 Judd Street, London, WC1H 9NE

This policy will be reviewed annually to ensure that it remains relevant, both internally and externally.

## Version control

The table has five columns and two rows, first row headings.

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| Version | Date | Author & Job Title | Status & Level of Approval | Changes |
| 1.0 | August 2022 | Firuzé Bertiz, Senior Behavioural Insight Manager |  | Policy first drafted |

## Document control

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## Appendix 1: Involvement of people with lived experience in ethical decision making

This paper supports the following documents: RNIBs Behavioural Insight Ethics policy and RNIB framework for using Behavioural Insight.

### Why is it important to involve people with lived experience?

If an activity or intervention is being planned by RNIB which could have an impact on the behaviour of a group of people, then representatives of that group of people should be involved in ensuring the activity or intervention is done in an ethical way.

If the decision was solely left to RNIB staff and/or its representatives, there is no independent perspective. Involving people with lived experience would help to provide validation and endorsement from the perspective of someone possibly affected by the behaviour change.

### What is their role?

It is beneficial to have someone with lived experience to provide personal perspective alongside other ‘experts’ to:

1. To provide a gut reaction to the activity (e.g. does it feel right, does it cause any concerns, does it make people feel uncomfortable?).
2. Ensure the activity or intervention is relevant to the people it’s trying to influence (e.g. do people actually need this intervention? Is it something that would resonate with them?)
3. Help to define what activities are acceptable and appropriate.
4. Identify if any informed consent is required and the most accessible process around this.
5. Ensure the activity or intervention is beneficial to the people it’s trying to influence.
6. To ensure the motivations of any intervention is done with good intention and in line with the commitments outlined in the organisations’ Behavioural Insight Ethics Policy.
7. To provide a perspective on the blind and partially sighted communities response to the activity.

### When to involve people with lived experience

Where possible, involve people from the beginning so that they have a good feel for the project, the reasons for doing it and what you are trying to achieve.

This will also save you time as significant changes are less likely to occur at a late stage in the project delivery.

### How to involve people with lived experience

There are different ways that you could ensure you get the best from an ethnical review of your project. Some examples are below:

1. **Include people with lived experience on your project board.**

Recruit at 2 – 4 people to be project steering group members.

**Pros**

* Time Saving: Individuals are aware of the project, its aims and its deliverables right from the start and can guide the project and comment on its suitability and highlight any ethical issues as you proceed.
* Wide ranging input: Individuals can input into other areas of the project, helping you to co-design it from the start and support with other elements of the project providing a lived experience perspective throughout.

**Cons**

* Long term commitment and their input may not always be required – there may be quiet times.
* Requires some volunteer management and consistent communication.

1. **Set up a small ethical review panel**

Recruit at least 2 – 4 people with lived experience to review your project from an ethical standpoint.

**Pros:**

Quicker process with a clearer defined responsibility for people with lived experience.

**Cons:**

* Could cause a significant re-design of your project as this input could come too late in the project design.
* Significant support required to ensure people understand their role and how to make an ethical decision.

For more ideas on how you can involve people with lived experience in decision making processes, please visit the [Involvement Hub: Bringing Lived Experience into Your Work.](https://rnib.sharepoint.com/sites/InvolvementHub/SitePages/Recruiting-and-working-with-people-with-sight-loss.aspx)

## Other things to consider

It is important to be aware that involving people with lived experience may present biases and conflicts of interest within this space. However, staff may also have these biases and conflict and so this can be mitigated by all group members being honest, clear and upfront.

## Where to go for more help and advice

Firuzé Bertiz - Senior Behavioural Insight Manager

* Owns the RNIBs Behavioural Insight Ethics policy and RNIB framework for using Behavioural Insight.
* Can provide guidance and training on Behavioural Insight and how to apply it to your role and/or project.

National Involvement Team – Sue Worthington and Mandy Owens

* Own the RNIBs Involvement Strategy.
* Can provide guidance and support around how to best involve and support people with lived experience in all aspects of your work, including ethical boards.