Guidelines for Ethics Review of Course-Based Research Projects and Coursework Research Review Committees

The University of Manitoba encourages course-based research at both the undergraduate and graduate levels for purpose of developing research skills. These projects may be carried out by individual students, small groups, or as a single class project. The Tri-Council Policy Statement Ethical Conduct for Research Involving Humans (TCPS 2) and the University of Manitoba Ethics of Research Involving Humans Policy require projects involving humans to complete an ethics application for review by the appropriate REB and to receive ethics approval before undertaking the project.

Prior to preparing an ethics application, the instructor should determine whether the course activities require ethics approval from an REB. These guidelines are provided to help the instructor determine whether ethics approval is required for their class exercise.

Course-based research activities vary in scope, but may include:

- students conducting interviews, administering standard tests, or distributing questionnaires to develop interview or questionnaire design skills;

- conducting “mini” research projects where students pose research questions, gather data from human participants, and analyse the data for presentation; or

- other activities that would be considered research within the disciplinary traditions in which the course is being taught.

Distinguishing Research from Professional Skill Development

In some class situations the information gathering procedures and practices students are expected to use are exclusively required for pedagogic purposes. They are not conducted within the context of, or embedded within, a research framework. For example, professional faculties have students conduct interviews as part of skill development or individual knowledge acquisition. Information gathering projects within these situations are not subject to REB review requirements, however they must align with the appropriate professional standards or codes of conduct, and review processes required by the relevant Faculty.

The following criteria can be used to assess whether information-gathering activities within a university course are part of a research project or are exclusively for the teaching of professional skills or pedagogic purposes. If after reading these guidelines it is still uncertain whether a learning activity or project falls under or outside the scope of the criteria outlined in this document, the Human Ethics Officer should be contacted for guidance.

Information gathering activities are classified as research when:
• the intent is to educate students on research processes used to explore and expand existing theories and conceptual knowledge;

• students compare new techniques, practices, programs with standard approaches to determine which is more effective;

• the results or findings are written in a format that would be acceptable for a research journal or academic conference presentation; or

• primary data is collected and organized for analysis and distribution or dissemination.

Information gathering activities are classified as **professional education/development** when:

• the intent is to use the information to provide advice, diagnosis, identification of appropriate interventions, or general advice for a client or colleague;

• the intent is to develop skills which are considered standard practice within a profession (e.g., observation, assessment, intervention, evaluation, auditing); or

• the information gathering processes are part of the normal relationship between the student and the participants (e.g., classroom teacher and students, nurse and patient, lawyer and client, business owner and consultant)

*Instructors who are uncertain as to whether a learning activity or project falls outside the scope of the criteria outlined in this document should contact the Human Ethics Office in writing at HumanEthics@umanitoba.ca.*

**Limitations for Course-based Research and Professional Education/Development**

Course-based research projects must comply with the following criteria:

1. The research projects must be no more than minimal risk (i.e. everyday life).

2. The research participants must be drawn from the general population, capable of giving free and informed consent. Protocols that include vulnerable populations must be reviewed by the appropriate REB and are not eligible for review under the Coursework Research Review Committee.

3. The student projects must not involve any personal, sensitive or incriminating topics or questions that could place participants at risk.

4. The student projects must not manipulate behaviour of participants beyond the range of "normal" classroom activity or daily life.
5. The student projects must not involve physically invasive contact with the research participants.

6. The student projects must not involve deception.

**Application for Ethics Approval**

If a class project falls under the definition of research as described above, the proper procedure is to complete an ethics application and submit it for review by the appropriate REB. If the research question and methodology will be similar across all students in the class (general) then a single ethics protocol submission form should be submitted for the entire class by the instructor. If the research methodology and question will vary with each student (specific), then each student will need to submit an individual request for ethics approval to the REB.

- When the instructor (general) applies for a course, the form should be completed from the perspectives of both an instructor and a principal investigator. In particular, instructors need to include a summary of the instructions given to the class regarding the ethical issues associated with the information collection processes/procedures. Where necessary, written evidence granting approval to carry out student research in outside agencies (e.g., health authorities, school boards) needs to be included.

For each research project within the class, instructors need to collect some type of assurance that students will comply with the ethical expectations, including the processes for obtaining participants and their informed consent. These assurances should be retained on file for two years. If the instructor chooses not to require a written request for ethics approval they need to

- describe the methods they plan to use to monitor the students’ activities,

- ensure a record of the activities is maintained for two years, or

- provide a justification for not requiring students to provide an assurance of ethical behaviour.

**Coursework Research Review Committee (CRRC)**

In circumstances where the frequency or nature of course-based research warrants, the REB may delegate its review of course-based research projects to a formally constituted Faculty/Department-based Coursework Research Review Committee (CRRC). This delegation is based on condition that the review process of each CRRC is
in compliance with the TCPS 2 and the University of Manitoba Ethics of Research Involving Humans and its attendant procedures. Everything that applies to an REB within these policies and procedures, also applies to a CRRC. The CRRC shall require and maintain minutes of CRRC meetings, records of protocol submissions, and all recommendations and decisions resulting from the reviews. The CRRC shall report twice annually to the REB under which it has been constituted, to enable the REB to fulfill its responsibility for ethics oversight.

It is advisable for instructors to clarify the status of class exercises with the appropriate REB or CRRC Chair at the beginning of each academic term. If data will be used outside of the classroom, the ethics application must be approved by one of the two REBs at Fort Garry (REB 1 or REB 2).

**CRRC Terms of Reference**

Coursework Research Review Committees should have their own Terms of Reference which should be in accordance with the requirements outlined below.

**Purpose**

A CRRC reviews all proposals by students who plan to collect data from humans while taking a course, for data used solely for the course. Students meet this requirement and receive approval from the CRRC in order to collect data.

**Composition**

The CRRC should be chaired by the Associate Dean, Research, in the relevant faculty. The Chair may appoint a designate when a potential conflict of interest exists. The Chair may invite faculty members to review student research proposals on an ad hoc basis.

**Process**

Students should submit their applications on the standard REB ethics protocol form. The Chair will arrange for review of each student application and will communicate decisions and feedback to the student.

**Examples of Projects and Activities and the Review Procedures**

1. Projects with the following characteristics are eligible for Course-Based Research review and approval:
   a. Projects where primary data is being collected and organized for analysis and distribution or dissemination within the classroom;
   b. Projects designed to answer research questions;
   c. Projects involving a risk of disclosure, publication, or use of data outside the classroom or outside the organization being studied;
d. Projects where students are asked to sign a non-disclosure or confidentiality agreement;

e. Projects where students require consent to use individual identifiers in reports or classroom presentations because of confidentiality or privacy concerns;

f. Projects where “ownership of information” or “product development” as a result of a project may become an issue;

2. Projects that require regular REB approval:

a. Projects that are a direct extension of the course instructor’s research;

b. Projects involving more than minimal risk as defined by the Tri-Council Policy Statement;

c. Projects applicable to an honours, Master’s or Ph.D. thesis;

d. Projects where the participants are not capable of giving free and informed consent and which include vulnerable participants such as children, persons who are not legally competent to consent, mentally incompetent persons, legal wards or persons dependent on the researcher(s) for therapeutic care;

e. Projects which involve any personal, sensitive or incriminating topics or questions which could put the participants or the researcher(s) at risk;

f. Projects which involve deception;

g. Projects which involve manipulation of the behaviour of participants beyond the range of “normal” classroom activity or daily life;

h. Projects which involve physically invasive contact with the research participants.

3. Projects that do not require REB review and approval:

a. Projects where students are conducting the research on themselves during class time;

b. Projects involving the use of records or information that is in the public domain, including the use of anonymous secondary data and surveys or questionnaires that have already been published;

c. Projects involving the use of naturalistic observation where there is no reasonable expectation of privacy (i.e. public park).
d. Practicum or job training projects where students are fully integrated into the organization’s operational practices and are not conducting research;

e. Projects where the intent is to use the information to provide advice, diagnosis, identification of appropriate interventions or general advice for a client;

f. Projects where the intent is to develop skills which are standard practice within a profession (e.g. observation, assessment, intervention, evaluation, auditing); or

g. Projects where the information gathering processes are part of the normal professional relationship between the student and the participants.