

Faculty of Management Ethics Review Policy for Course-based Projects

1. What research can be assessed for ethical review at the Faculty level rather than by a University level REB?

According to the *Dalhousie University Policy on the Ethical Conduct of Research Involving Humans* (2012), the only ethics application reviews that shall be conducted at the Faculty or Departmental level are undergraduate or graduate course-based (non-thesis) research projects which are conducted as part of a normal class assignment or within a reading course; reading and conference course; special projects course, or equivalent. In addition, the research must involve only minimal risk to participants and it cannot involve a vulnerable population.

All undergraduate or graduate student research that is conducted as part of academic course-work and that exceeds minimal risk or involves a vulnerable population must be reviewed by a Dalhousie University-level research ethics board (REB). All research conducted by graduate students for the purposes of a thesis, by full or part-time faculty, Postdoctoral Fellows, Research Associates, or staff, must also be reviewed by a Dalhousie University REB, regardless of risk level. This document consequently applies only to research conducted as part of the course work for B. Commerce, B. Management, MBA (and its various types), MI, MPA (and its various types), MES, MIM, MREM, and MMM. It is important to note that it is course registration, not degree registration that determines which students must undergo this process. The policies & procedures outlined in this document do not apply to thesis work of MES or MI students, or to faculty-directed research.

Students who are unclear about whether their research study may undergo ethics review at the Faculty level, by the Research Ethics Officer (REO), may consult the checklist below. All six criteria must be met in order for the research project in question to be reviewed by the REO rather than by a Dalhousie University REB.

- ✓ You are a student enrolled in a course in the Faculty of Management
- ✓ You are not conducting the research in your capacity as a full or part-time faculty member, a post-doctoral fellow, a research assistant, or a staff person
- ✓ Your research project is required for a course in the Faculty of Management
- ✓ Your research project is not solely part of a thesis and it is not Research Assistant work
- ✓ Your research project involves minimal risk to participants
- ✓ Your project does not involve a vulnerable population

2. What is “minimal risk” and who is considered a “vulnerable population”?

Minimal risk, as defined by the Interagency Advisory Panel on Research Ethics, means that “potential subjects can reasonably be expected to regard the probability and magnitude of possible harms implied by participation in the research to be no greater than those encountered by the subject in those aspects of his or her everyday life that relate to the research” (*Tri Council Policy Statement on Ethical Conduct for Research Involving Humans*, p. 194). In the Faculty of Management, most student research is social-science research that includes human participants who are surveyed or interviewed or participate in focus groups or some form of user test. This research, in general, falls into the category of minimal risk.

The exception to this is research that deals with vulnerable populations including children, those unable to provide informed consent, or those of special populations, e.g., Aboriginal groups, as identified by the TCPS2. Ethics applications concerning these latter groups shall continue to be handled by a Dalhousie REB even if the work is that of a student doing non-thesis research.

Please note that TCPS2 does not use the “age of majority” to identify whether a potential participant has the ability to provide informed consent. Rather than age, the determining criterion in the provision of a young person’s consent to research is “the capacity to consent on their own behalf in the context of the particular study” (see Article 3.10, p. 42). Students wishing to include children or post-secondary students in their research should clearly address the issue of consent by identifying prospective participants’ ages and their “capacity to understand the particular research project” (TCPS2, p. 42).

3. In the context of coursework, which activities constitute research? Do all activities that require a student to interact with a human agent constitute research?

The TCPS2 has defined research as “an undertaking intended to extend knowledge through a disciplined inquiry or systematic investigation” (p. 7). According to Article 2.1 of this Policy, “all research that involves *living human subjects* requires review and approval” (p. 15).

The general factor that affects research in the Faculty of Management is whether human participants are used in data collection that will be used for research purposes. However, research that is based on existing information in the public domain, such as news articles or publicly-available Statistics Canada survey data, is generally not classified as research involving humans that requires ethics review. Such information is legally accessible to the public, and no reasonable expectation of privacy surrounds it.

This publicly-available information may also include the following:

- Court judgments or registries of deaths
- Publicly available statistics/data such as Statistics Canada public use data files
- Performance evaluations within an organization
- Archival materials (*note that Canadian national, provincial and municipal archives have access policies/legislation which may restrict access to certain information, but that this information may still be considered publicly available. Students should consult with archival staff and the Research Ethics Officer should they be unsure as to whether an ethics review is required for the work they plan to do*)
- Print or electronic publications, film, audio or digital recordings, press releases or public literary events which include identifiable information
- Online material which is publicly accessible and for which there is no reasonable expectation of privacy (*note that exceptions to this include websites which are publicly accessible but are nonetheless considered private, such as chat rooms or self-help groups requiring membership*)

Some students may find themselves in a situation in which they need to interact with individuals who are not themselves the focus of the study, in order to obtain information. For the purpose of the Faculty of Management Ethics Review Process, these individuals are not considered to be participants in the study, and ethics review approval is therefore not required in order for students to obtain this basic information. However, if a student plans to ask an individual his or her personal opinion, or observe the individual in his or her work setting, this person is considered a participant (see TCPS2, p. 16) and ethics review is required.

Many students may be enrolled in courses involving consultation with a partner organization throughout the semester (i.e. the *Management Without Borders* course). Students often engage with their primary contacts at their partner organization in order to obtain information regarding policies, procedures or professional practices such as how a particular situation might unfold in the workplace. These interactions with contacts at partner organizations are necessary to complete strategic plans, business plans, feasibility assessments etc. Such interactions with primary contacts do not require ethics review because the individuals themselves are not the focus of the “research” in which students are engaging; they are not being observed in their work setting, nor are they being asked for their personal opinions on an organization. However, when these interactions with partner organizations involve broader public consultations (i.e. focus groups, interviews, or surveys) on behalf of the organization, ethics review becomes necessary.

4. What does a Faculty/Department-level ethics review entail?

The ethics review shall be guided by the principles of respect for persons, concern for welfare, and justice, which should act as the underlying framework for students’ ethical research (TCPS2). Ethical reviews are not research methodology reviews. The Research Ethics Officer trusts that the supervising instructor has assessed the scholarly merit of the research.

The cornerstones of the ethical review process at the Faculty of Management level ensure that:

- a) Informed consent will be obtained from the participants
- b) There is minimal risk and participants will be informed about any potential risk, however small
- c) Participants will be respected and their identities will be protected unless otherwise warranted by the research methodology

Thus, an ethics review will ensure that those elements are evident, which requires understanding how the participants are being treated, the types of activities that they will be asked to do, and how the data are managed. By carefully reviewing students’ ethics review applications, the Research Ethics Officer’s goal is to help students ensure that all research study participants will be protected and respected.

5. What information is required in a student’s ethics application?

To assess the issues addressed above, the following items used at the national and University levels will also be used in the Faculty/Department level review:

- a) Background
- b) Methodology (including data collection instruments such as questionnaires, where applicable).
Note that some courses may involve questionnaire creation/piloting as a component of course work. In such cases, students should not submit the questionnaire as a part of their ethics application as it is assumed that the course instructor will vet the questionnaire content appropriately.
- c) Participants
- d) Recruitment (including any recruitment instruments that will be used)
- e) Risks and benefits
- f) Privacy and confidentiality
- g) Compensation
- h) Conflicts of interest
- i) Informed consent

6. What are the duties of faculty and staff reviewing ethics applications in the Faculty of Management?

Duties of the Research Ethics Officer

The Research Ethics Officer's primary objective is to undertake ethics review of ethics applications for undergraduate and graduate students completing course-based projects in the Faculty of Management in a timely manner. S/he shall review only ethics applications for minimal risk student research that fit the definition outlined in TCPS2, and which meet the additional criteria outlined on page 1 of this document. In addition, the REO shall assist in educating students about the ethics review application process and s/he shall provide guidance to students who may have specific questions regarding the process.

Duties of the Management Ethics Review Standing Committee Reviewers

The primary objective of the Management Ethics Review Standing Committee (MERSC) reviewers is to undertake review of ethics applications for students in the Faculty of Management during academic years where the position of REO is vacant or where there is an unusually high volume of applications for the REO to review in a timely manner. The MERSC acts as a "standing committee [...] that will function throughout the academic year (and in spring and summer terms where applicable)" (*Reporting of Unit-level Research Ethics Review Minimal Risk, Course-based (non-thesis) Research, Dalhousie University, 2013, p. 1*). The MERSC reports to the Assistant/Associate Dean (Research) and includes all members of the Faculty who are qualified to review ethics applications. These individuals will have conducted research that requires the submission of ethical protocols, and have had protocols reviewed successfully. As there is no specific training for this process, reviewers are expected to be familiar with the *Tri-Council Policy Statement on Ethical Conduct for Research Involving Humans* available at <http://www.pre.ethics.gc.ca/eng/policy-politique/initiatives/tcps2-eptc2/Default/>), and to have completed the national Panel on Research Ethics online tutorial, Course on Research Ethics (CORE). When possible, the MERSC (a quorum of three) will meet once a year to review and update the Faculty's ethics review process and procedures.

Duties of the Assistant/Associate Dean (Research)

The Assistant/Associate Dean (Research) or designate (e.g., a member of the Faculty's Research Advisory Committee), will liaise with the FoM Research Ethics Officer and the University's Office of Research Ethics Administration to ensure that the Faculty's practice fits within the policies and guidelines of the University and the Tri-Council. The Assistant/Associate Dean (Research) or designate will also liaise with the Curriculum Committees of the Schools and Programs regarding the training of instructors about process and procedures.

7. What is the review process for submitting an ethics application for a course-based project in the Faculty of Management? Are there any additional requirements?

Prior to submitting an ethics application, students must have recently completed (no more than two years ago) the online tutorial TCPS 2: CORE (Course on Research Ethics) (available at: <http://www.pre.ethics.gc.ca/eng/education/tutorial-didacticiel/>). Certificate of completion must be attached to the student's ethics application. The instructor (supervisor) must have read and approved the student's ethics application prior to submission. The reviewer will assess only the ethical issues surrounding the research. It is assumed that the research methodology's suitability for the course project requirements/objectives has been properly vetted by the instructor.

	When a Research Ethics Officer is in place	In the absence of an Research Ethics Officer
Where to submit applications	Ethics applications shall be submitted directly to Alison Brown, Research Ethics Officer with the Faculty of Management, via email at alisonbrown@dal.ca	Applications shall be submitted to the Office of the Assistant/Associate Dean (Research) and from there a qualified faculty member (MERSC reviewer) will be assigned to review the application. The faculty member reviewing a student's application cannot be the student's course supervisor/instructor. The office maintains a list of MERSC reviewers and assigns the application to the next person on the list of eligible reviewers. A reviewer drops to the bottom of the list upon being assigned an application.
Submission procedures	Applications shall be accepted on an ongoing basis. All applications shall be fully reviewed and feedback shall be returned to the student by the REO via email within a period not exceeding 7 days from the date of submission. Students should expect at least one revision after their initial submission and plan their project timeline accordingly. Students submitting revised applications may do so at any time.	Please consult with the Office of the Assistant/Associate Dean (Research) for information regarding application submission deadlines.
In the event of a dispute	<p>When problems arise, the Research Ethics Officer will work with the instructor to ensure that the ethics application meets ethical policies. If the instructor and the REO cannot reach an agreement, the research application will be reviewed by a MERSC reviewer (following the same procedure as when there is no REO). If no agreement is reached, the application will be submitted to the University's Ethics Review Board.</p> <p>In accordance with section 2-6 of the Dalhousie University Policy on Academic Dishonesty, should the REO suspect that an academic offence has been committed, s/he shall submit a signed statement outlining the basis for the allegation, together with relevant supporting evidence, to the Academic Integrity Officer of the Faculty of Management within 10 working days of becoming aware of the alleged offence.</p>	<p>In the event of a dispute (that is, the instructor and the MERSC reviewer cannot reach an agreement), the application will be reviewed by a second MERSC reviewer. If no agreement is reached, the application will be submitted to the University's Ethics Review Board.</p> <p>The MERSC reviewer shall adhere to the same academic dishonesty policy outlined for the REO.</p>

All files are open until an application has been approved. Approved applications are considered valid until but not exceeding 14 days after the final date of classes for the academic semester of the course (for which the project was conducted). The REO may extend this approval duration on a case-by-case basis where warranted. Note that the REO shall review only those applications which are written at a level of quality and clarity to be expected of graduate work at Dalhousie University. Should the application fail to meet an acceptable standard of quality, the REO shall notify the student and return

the application to him/her within 3 days of submission. After making the appropriate modifications, the student may then resubmit the application at his or her convenience.

8. What is the Faculty of Management Policy on the retention/disposal of data for course-based projects?

Raw data for all course-based projects (non-thesis) completed by undergraduate and Master's students and requiring the submission of an ethics application to the REO/MERSC reviewer must be retained for a period of one year after the receipt of final grades for the course for which the project was completed. This data may be retained by both student(s) researcher(s) and the instructor(s) of the course, or solely by the former or by the latter. Students must clearly state their data retention/disposal plan in their ethics application submission. If students' data disposal plan will differ from the retention policy outlined above for any reason, a detailed explanation must be provided in the ethics application and must be approved by the REO/MERSC reviewer.