



COLLEGE OF THE NORTH ATLANTIC

OPERATIONAL POLICY

TOPIC: ETHICS REVIEW FOR RESEARCH INVOLVING HUMANS

Policy No.	AC-113	Division	Academics and Applied Research
Supersedes	N/A	Board Policy Ref.	N/A
Related Procedure	AC-113-PR	Effective Date	September 5, 2023 (R3)

1. PURPOSE AND SCOPE

The purpose of the Ethics Review for Research Involving Humans Policy (the policy) is to ensure that all research involving humans be subject to a research ethics board (REB) review as per the [Tri-Council Policy Statement: Ethical Conduct for Research Involving Humans – TCPS 2 \(2022\)](#) (TCPS 2).

This policy applies to research projects involving humans that are undertaken by or conducted on members of the CNA community, irrespective of the source of financial support (if any) and irrespective of the location of the research project. Research projects undertaken by researchers external to the CNA community who access CNA resources (either equipment or members of the CNA community), will also fall under the jurisdiction of this policy.

Research that involves humans, for the purposes of this policy, is defined as per Article 2.1 of the TCPS 2:

- *Article 2.1*
The following requires ethics review and approval by an REB before the research commences. Research involving:
 - *living human participants;*
 - *human biological materials, as well as human embryos, fetuses, fetal tissue, reproductive materials and stem cells. This applies to materials derived from living and deceased individuals.*

Some research on humans is exempt from a REB review under this policy as per Articles 2.2 to 2.4 of the TCPS 2:

- *Article 2.2*
Research does not require REB review when it relies exclusively on information that is:
 - *publicly available through a mechanism set out by legislation or regulation and that is protected by law; or*
 - *in the public domain and the individuals to whom the information refers have no reasonable expectation of privacy.*

- *Article 2.3*
REB review is not required for research involving the observation of people in public places where:
 - *it does not involve any intervention staged by the researcher, or direct interaction with the individuals or groups;*
 - *individuals or groups targeted for observation have no reasonable expectation of privacy; and*
 - *any dissemination of research results does not allow identification of specific individuals.*

- *Article 2.4*
REB review is not required for research that relies exclusively on secondary use of anonymous information, or anonymous human biological materials, so long as the process of data linkage or recording or dissemination of results does not generate identifiable information.

Certain activities (not considered research but employing traditional research methods and techniques) are exempt from a REB review under this policy as per Articles 2.5 to 2.6 of the TCPS 2:

- *Article 2.5*
Quality assurance and quality improvement studies, program evaluation activities, and performance reviews, or testing within normal educational requirements when used exclusively for assessment, management or improvement purposes, do not constitute research for the purposes of this Policy, and do not fall within the scope of REB review.

- *Article 2.6*
Creative practice activities, in and of themselves, do not require REB review. However, research that employs creative practice to obtain responses from participants that will be analyzed to answer a research question is subject to REB review.

2. POLICY

All research involving humans, defined as an undertaking intended to extend knowledge through a disciplined inquiry or investigation, shall be carried out in

accordance with TCPS 2, the Tri-Council Policy Statement on Integrity in Research and Scholarship [Tri-Agency Framework: Responsible Conduct of Research \(2021\)](#), and [Requirements for Certain Types of Research](#). In the case of any conflict between this policy and procedure and those established under the above-mentioned documents, the latter would prevail.

All research projects must be submitted to the Office of Applied Research and Innovation (OARI) for assessment and recommendation to the CNA Executive, as appropriate. All submitted research projects must include verification of REB approval (as per TCPS 2). Research proposals lacking the required REB approval will be provided with access to Memorial University’s [Interdisciplinary Committee on Ethics in Human Research](#) (ICEHR), as necessary. No research project will commence before verification of a REB approval.

Researchers engaged in research involving humans have the professional responsibility to adhere to the ethical norms and codes of conduct appropriate to their respective disciplines. In addition, researchers who request to conduct research on humans must provide written evidence of completion of the [TCPS 2: CORE-2022 \(Course on Research Ethics\)](#).

Research/activities exempt from a REB review as per Articles 2.2 and 2.6 of the TCPS 2 (but employing traditional methods and techniques) may still raise ethical issues that would benefit from careful consideration by an individual or a body capable of providing some independent guidance, other than a REB.

CNA does not conduct research involving animals.

3. PROCEDURE

The Vice President, Academics and Applied Research, in consultation with the OARI, shall ensure that procedures are developed and implemented in accordance with this policy.

Approval History	
Approved by President	May 13, 2008
Revision 1	December 22, 2008
Revision 2	November 4, 2016
Revision 3	September 5, 2023