



Facilitating human research ethics review for student research

Final report 2015

2012 National Teaching Fellow

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<http://www.teaching-research-ethics.com>

Support for the production of this report has been provided by the Australian Government Office for Learning and Teaching. The views expressed in this report do not necessarily reflect the views of the Australian Government Office for Learning and Teaching.



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2015

ISBN 978-1-76028-760-3 [PDF]
ISBN 978-1-76028-761-0 [DOCX]
ISBN 978-1-76028-762-7 [PRINT]

Acknowledgements

I wish to thank the Office for Learning and Teaching, particularly Suzi Hewlett and Siobhan Lenihan, for their support and guidance during this Fellowship, awarded in 2012 and undertaken in 2013 and 2014. Current and former OLT Fellows acted as valuable mentors, especially Angela Brew, Jacquelyn Cranney and Mitch Parsell. Macquarie University's Office of the Provost, particularly Judyth Sachs and Barb McLean, provided unstinting support for this Fellowship. Macquarie University's Faculty of Arts, particularly John Simons, Gill Ellis, and Payel Ray, provided support in managing this grant, as did the University's Research Office and finance gurus, especially Phyllis Heggie and Payal Khosla. Members of Macquarie University's Human Research Ethics Committee helped me through many informal conversations to understand the broad ethnographic context of how ethics committees work. I particularly wish to thank Trevor Case, Nicola Myton, Fran Thorp and Kandy White. I also wish to thank Macquarie University's Department of Anthropology and Warawara: Department of Indigenous Studies, particularly Gawaian Bodkins-Andrews, Aaron Denham, Greg Downey, Chris Houston, Susan Page, Jaap Timmer, Michelle Trudgett and Eve Vincent, for insightful conversations about ethics review and teaching in the social sciences. My co-investigators on an ARC Discovery Project also provided me with valuable insights and conversations about ethics review in the context of the expanding neoliberal audit culture in Australian universities: thanks to Kandy White, Colin Thomson, Mark Israel and Louise Carey-White. My Fellowship stands on the shoulders of all those research participants and, I hope, future collaborators whom I interviewed and who helped me to understand the terrain of ethics review and student research in a wide range of Australian universities. I have not named them here for privacy reasons, since a number of them shared their views in confidence, but I'm deeply indebted to them for their time, their ideas, and their candidness. Finally, I want to thank my partner, David Inglis. This Fellowship involved a great deal of travel and work on the weekends, much of which happened just as we were becoming foster parents, and it would not have been possible without Dave's hard work and support on the home front.

List of acronyms and abbreviations used

AHEC: Australian Health Ethics Committee, the NHMRC body which revises the National Statement.

HREC: Human Research Ethics Committee

IRB: Institutional Review Board (the American equivalent of HRECs)

National Statement: Short for *The National Statement on Ethical Conduct in Human Research*, the Australian national human research ethics guidelines published by the NHMRC

NHMRC: National Health and Medical Research Council

REB: Research Ethics Board (the Canadian equivalent of HRECs)

Executive summary

Introduction

I began this Fellowship from the assumption that learning through research is a valuable pedagogical method. Independent research gives students the personal experience of seeing the unexpected turns taken during real research, in a way that talking about it in the classroom cannot. Doing their own research gives students ownership over their learning, leading to high levels of engagement in the classroom and outside of it.

But preliminary research (Wynn 2011) suggested that, for disciplines that engage in human research, the process of obtaining ethics clearance is a significant barrier to developing a research-led curriculum.

Aims

For this Fellowship I thus aimed to survey Australian universities to find out what policies and procedures either hinder or facilitate a research-led undergraduate curriculum where students undertake empirical human research.

I would then use this research to distil a best-practice approach or approaches, and communicate policy recommendations back to study participants and to ethics administrators at Australian universities, sharing examples of what works and what doesn't.

In the process of interviewing and discussing the issues with colleagues across the country, I hoped to build a network of people interested in ethics review of student research. In so doing, I aimed to create a kind of critical mass of thinking about problems, solutions, and opportunities for innovative learning and teaching.

Methods

I visited 14 universities from every state and territory of Australia. I formally interviewed 40 people. Seventeen were ethics committee chairs or administrators; six were or had been ethics committee members, and 17 had never served on a Human Research Ethics Committee (HREC). My interview instrument used the same set of seven questions (see Appendix B), but also allowed space for open-ended discussions. The Fellowship research received ethics approval from Macquarie University's HREC.

While I initially sought out leaders in research-led teaching to interview, I soon realised the methodological flaw in this approach. Leaders in research-led teaching are often those who have built good relations with their ethics review bureaucracies, but they are not necessarily "typical" of what teaching looks like at their institution. I thus used a combination of purposive and random sampling to recruit participants who hadn't managed to navigate the bureaucracy, who were either having their students do research without ethics approval, often quasi-secretly, or who had given up on the possibility of student research because they found the bureaucracy too difficult or time-consuming to navigate.

Case studies

I distilled these forty accounts into five case studies. My interview sample was relatively small and not representative, so rather than giving numbers and percentages, I report on general trends. While not statistically representative, my participants' stories represent a range of issues, structures, innovations, problems, and success stories that I encountered at universities across Australia.

Key Findings

I then analysed these case studies and the stories of other research participants to identify key themes:

- Participants agreed that a research-led curriculum is the best way for students to learn. It inspires and motivates them to take ownership of their own learning.
- There was surprising incongruence between ethics administrators' and teachers' accounts. Often, ethics administrators reported that their system was efficient and well-liked, yet teachers reported that they'd shut down student research because the ethics review system was too obstructive.
- Administrators were often under-resourced and overwhelmed by ethics applications. Most universities had devolved review of low-risk research to sub-committees to deal with this workload, and this was how a lot of student research was handled.
- But, as many pointed out, the downside of efficient, local, low-risk research ethics review was that researchers were incentivised to have their students do low-risk, and thus low-impact, research. As one participant, Professor Mark Israel, poignantly argued,

“We want a research ethics system that supports researchers who are working on the cutting edge. And that means we've got to have the capacity to support risk-taking. Not stupid risk-taking, not unethical risk-taking, but you don't want a risk-averse ethics committee. You want an ethics committee that actually tracks that frontier and supports people going beyond the existing frontier.”

- Both researchers and administrators acknowledged that ethics review was a fundamental impediment to research, if only because it took time to get approval.
- Of course, that impediment would be worth it if ethics review was ensuring the protection of research participants. However, a majority of participants, including ethics administrators, confessed that they didn't believe that ethics review made student research more ethical, one of the most striking findings of this study.
- Many argued that ethics review existed mainly to indemnify universities (and to a lesser extent to protect student researchers), not to protect research participants.
- Yet even when interviewees said they believed ethics review produced more ethical research, the reality of risk actually entailed in student research is not congruent with imaginations of risk. Very few respondents (only four of 40) could actually name a time

when student research had placed participants at risk, whether at their institution or elsewhere.

- Many respondents, regardless of their attitude toward ethics review, argued that it's not ethics review per se that produces ethical research practice, but rather the process of reflecting on ethical research practice. Thus, some argued, institutions needed to re-orient themselves away from a punitive, policing approach to ethics review to an approach that builds capacity for ethical thinking.

Best practice approaches and policy recommendations

A few approaches stood out as best practice. First, when institutions have dedicated forms for research-teaching projects, it convinces teachers that human research is possible for students, even expected or desirable, rather than a struggle with bureaucracy which only the most determined will attempt to overcome. Seven of the 14 universities I visited had dedicated forms for student research (see Appendix C). Yet many teachers at these seven institutions had *no idea* that there was a dedicated review process for research-teaching projects or that it was even possible to get approval at the class level for student research.

There is thus a clear need for high-level institutional support and an institutional culture that values student research. DVCs of research and teaching need to both send messages to administrators that research-led teaching is a goal, and encourage the simplification of systems to make this easier for both teachers and administrators, whose enthusiasm for research-led teaching often buckles under the weight of bureaucracy.

Online ethics training is a good way to scale up outreach and build capacity in research ethics for both staff and students. Three institutions have free online research ethics training courses that can be adapted for different disciplines and research methods: Macquarie University, University of Wollongong, and the University of Melbourne Dental School (see Appendix C). Institutions must view their ethics training in terms of capacity-building. Punitive approaches to ethics review results in researchers regarding the process as substance-less bureaucracy rather than a meaningful engagement with ethical thinking.

And finally, the best practice approach to ethics review identified in this Fellowship was a psychology department that had set up ethics review at the department level and developed easy and short ethics application forms specific to the disciplinary methods they used. In that department, student research was taking place at every level of the curriculum and ethics review took on average *three days* (compared to *months* at other institutions).

Disseminating results

In a plenary address at the 2014 Australasian Ethics Network conference, I argued for local, department-level ethics committees and a culture of ethics review that seeks to facilitate, not obstruct, research. Feeding my research results to ethics administrators and scholars, to the participants in this Fellowship and the NHMRC, I have built a network of 24 people at 14 institutions interested in reforming ethics review in order to facilitate student research as part of the teaching curriculum. The reforms that I've advocated for won't happen quickly, but I've identified a critical mass of academics interested in figuring out ways to advance research-led teaching and I'm excited to see where we go with it.

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Chapter 1: Impetus and Background to the Fellowship

Introduction

I have a colleague in the United States who teaches medical anthropology to third-year university students. The main assignment that my colleague gives these students in this class is to craft an illness narrative. He asks them to go out and interview a family member about an illness they experienced or an encounter they had with a biomedical doctor or healthcare system or alternative medical practitioner. The exercise shows students that illness is not merely a physiological phenomenon, but also a profoundly social experience. It's a great exercise where students learn key medical anthropology concepts through their own research.

But there are several restrictions that he places on the students: first, they can only interview family members. The other set of restrictions is this: they can't interview children, the mentally disabled, *or pregnant women*.

Why was my anthropologist colleague grouping pregnant women in the same category as children and the mentally disabled?

I asked my colleague. He explained that he was trying to make sure that this student research project was low-risk so that it didn't need to go through institutional ethics review, and pregnant women were in the category of "vulnerable" populations, which would automatically raise the risk flag and necessitate institutional review.

The absurdity of suggesting that pregnant women who tell anthropology students stories are vulnerable like children and the mentally disabled illustrates something that is widely bemoaned by social scientists: the fact that human research ethics regulatory regimes that now govern the social sciences are imported from biomedicine. In so doing, they are sometimes poorly translated into the logics of different disciplines and methodologies. (Or, as Lederman [2006a] argues, it is actually social scientists who have to translate their methods into clinical models of research to get ethics approval.) The biomedical model restricts "experimenting" on a pregnant woman because she is the vessel for a vulnerable foetus, while the principle of the illness narrative method is to understand holistically a person's experience with both illness and with cultural ways of managing that illness, and at its base is a logic of empowerment, not risk management.

This anecdote from a colleague in the United States also illustrates a key aspect of the relationship between social scientists and ethics committees. Social science research and research-led teaching are constrained not just by ethics committees and their biomedical imaginations of risk, but also by how researchers *imagine* ethics committees' imaginations of risk, and then self-censor.

This story also, of course, tells us that there is exciting research happening - exciting because of what it teaches undergraduates, but also exciting because it is inspiring to students. Research-led teaching inspires students and convinces them that they have the skills and capacity to be part of a community of scholars. But this research-driven teaching

in the social sciences and humanities often happens under the radar because ethics committees are perceived to be obstacles to student research.

It is the obstacle of human research ethics review that I sought to address in this Fellowship.

The goal: ‘Learning in a research mode’

Learning through research is a valuable pedagogical method. Independent research gives students the personal experience of seeing how unexpected events often come up during the course of real research, in a way that simply talking about it in the classroom cannot. For those classes where it is appropriate to have students design and conduct their own mini-research project, following a research issue from conception through methodological development to implementation is an unparalleled way for them to understand the full scope of the research process.

Motivation is another powerful reason for encouraging student research. Doing one’s own research gives students a feeling of propriety that cannot be had through textbook reading about what other researchers have done. In a research-driven curriculum, students are not just “research spectators” or “research tasters” (Brew 2006: 161). Students and teachers together constitute a community of scholars, bound together in a culture of inquiry that breaks down the distinctions between learning, teaching and research. In the process, students gain an empowering sense of ownership over their own learning, leading to an incredibly high level of engagement in the classroom and outside of it.

This “learning in a research mode” (Elton 2005: 111) grounds active learning in the experiences and interests of students, leading them to value what they know as a foundation for learning and to use academic texts to help see the broader sociocultural, political, and economic patterns that shape the contexts of their own lives (Swartz 1998). Student researchers examine academic theories in relation to their own lived experiences (Kincheloe and Steinberg 1998: 17). When students define their own research projects, they become “authors of ideas and questions” (Swartz 1998: 114): not just solving problems but generating critical research questions.

Chemistry and biology students regularly get this kind of hands-on experience in the lab. Yet in the social sciences, where the lab is all around us and consists less of physical equipment than highly developed conceptual tools, paradoxically it is not very common for students to get “out in the field,” as we say in anthropology, to do their own research with human beings. One of the reasons for this is the requirement of institutional ethics review for human subjects research.

Embedding research-led teaching in the social sciences in Australian higher education is a valuable way to address government priorities around increasing engagement and retention. Independent undergraduate research fosters student engagement with their communities and inspires them to think about how their education can be applied to real-life experiences. Yet opportunities for independent undergraduate research are, in some institutions, being eroded by expanding ethics bureaucracies that are increasingly

demanding that student research be subjected to ethics review. The ethics review process is one of the most significant obstacles to universities and teachers who wish to incorporate original student research into the social science curriculum (Wynn 2011).

The obstacle: Ethics oversight and bureaucratic regulation

Historical atrocities conducted in the name of research in Nazi Germany led to the development of the first international code of human research ethics protocols, the Nuremberg Code. However, it was the 1964 Declaration of Helsinki which called for the institutional regulation of research by ethics review boards or committees. In Australia, the National Health and Medical Research Council (NHMRC) first began demanding that the human subjects research be reviewed according to international ethical standards starting in 1984, and in 1996, Senate review called for a national statement on research ethics to replace the multiple local position statements found in universities across Australia (Dodds 2000). In response, in 1999 the NHMRC published the first Australian ethics code, the *National Statement on Ethical Conduct in Human Research (ibid.)*. The National Statement was substantially revised in 2007 and was able to address, in part, the particular ethical issues entailed in social science research (the original code had fundamental assumptions about human research being primarily medical and/or clinical in nature). Each elaboration of ethics regulation in Australia has entailed demanding ethics review of more and more types of research – including, increasingly, undergraduate research.

Despite the existence of a national ethics code, implementation of the code takes place at a local, institutional level. Universities create ethics committees and devise local procedures for ethics review that conform to national guidelines, but there is considerable variation in how ethics review is implemented at different institutions. To researchers attempting to not only conduct ethical research but to comply with bureaucratic regulation of it, this has both advantages and disadvantages: on the one hand, there is scope for local ethics oversight to respond flexibly to the circumstances of local researchers. On the other hand, there is a steep learning curve, as each individual who joins an institution struggles anew to grapple with local requirements and expectations. For academic staff, this is something that one learns at the beginning of a career and continues to do over a lifetime.

But what are the implications for student research?

At Macquarie University, for example, a recent initiative to get students participating in the community through volunteer work has teachers eager to turn those volunteer experiences into a learning experience. Yet the moment that teachers ask students to write about and analyse their volunteer experiences it becomes human research and is subject to ethics review. This requirement of ethics review for student research with humans creates difficulties for students, teachers, and universities. For teachers, it takes a great deal of work to get ethics approval for students, and it can be difficult or impossible to get blanket ethics approval for an entire class when students are doing unique research projects. If teachers require students to apply for ethics approval for their projects, students struggle to navigate ethics bureaucracies for the first time, which can be overwhelmingly complicated. At the institutional level, university ethics committees are overburdened just reviewing staff research projects; adding individual student research applications to the review workload

would increase their burden exponentially.

Local implementation of national guidelines

The NHMRC does not have specific guidelines for how universities should deal with student research. Different teachers, universities, and ethics committees are thus handling student research in different ways (Wynn 2011).

For example, some teachers insist that students write their own ethics applications. The advantage to this approach is that it gets students learning about ethics regulations, but this can be overwhelming to students. Moreover, the timeline for ethics review rarely suits a short, one-semester research projects. By the time students have receive ethics approval, the semester might be more than half over. And, as noted, being asked to review individual student ethics applications can overwhelm ethics committees.

In some institutions, student research is not reviewed for ethical practice, or is reviewed by separate (subsidiary) ethics committees. Research that carries “negligible risk,” according to the NHMRC, does not have to be reviewed, so sometimes teachers get around the problem of ethics review by getting their students to only do low-risk research and thus do not go through ethics review.

Regardless of the NHMRC stance on negligible risk research using pre-existing data not requiring review, different institutions have very different rules about how to handle low-risk projects. Some do not require review, so researchers make their own decision about the level of risk entailed in their project. But this makes some universities and ethics bureaucrats nervous, because they wonder whether their idea of low-risk is the same as the researchers’. What if researchers are claiming negligible risk to get out of the tediousness of ethics review, but there is really more risk in their research than they see or claim? Other institutions do not require full-level review for low-risk and/or student research projects; they may have an abbreviated ethics application that ensures some level of oversight, or an expedited review system for low-risk or student applications. Still other universities require full ethics review for any research with humans, regardless of risk level.

In short, there is a variety of different solutions being implemented, and each solution has different implications in terms of encouraging or limiting student research. A driving question behind this Fellowship is whether the expanding ethics regime is hindering a research-led curriculum, or whether (like my own example shows) people are finding ways to incorporate ethics review into their curriculum development. What kinds of institutional structures work to either hinder or facilitate a research-led curriculum?

“Ethics creep” in the context of expanding neoliberal audit culture

But it’s important to understand the impact of ethics review on student research in the context of the expanding scope of ethics review more generally, or what some observers call “ethics creep” (Haggerty 2004), which in turn is part of a broader context of expanding neoliberal audit cultures in universities. Ethics review began in biomedical and clinical research, and only gradually came to govern more qualitative social sciences such as

anthropology, political science, sociology and, more recently, the humanities and creative arts. In the process of this expansion, many have argued that ethics review is having unprecedented impact -- largely negative -- on intellectual traditions in these disciplines.

“IRBs have disrupted student careers, set back tenure clocks, and blunted the essence of many intellectual traditions. Facing demands that spiral to the level of sheer impracticality, faculty and students at many institutions face a stark choice: to conduct innovative research in their fields or to meet the requirements of their institutions’ IRBs. Nor is there any persuasive evidence that research subjects’ rights or welfare have benefited, overall, in exchange for this damage. ... many researchers, fearing not just obstacles to their own research but the suspension of all federal funding to their university, appear to lead lives either of resentful compliance with IRB or of fearful avoidance of it” (Bledsoe et al. 2007: 397-398).

Kevin Haggerty argues that the structural changes are impacting not only careers but also the relationship between ethical research cultures and academic identities:

“The ethical status of research was historically governed through a combination of discipline-specific codes of conduct and the professional standing of research scientists. The training that academics received in research methods, ethics, and, most importantly, their practical experience in conducting research were previously presumed to offer sufficient protections against unethical behaviour. That system has now been supplanted and effectively replaced by a formal process of bureaucratic oversight. This marks a move away from a system based on an assumption of professional competence and responsibility to one based on institutionalized distrust, where researchers are presumed to require an additional level of oversight to ensure that they act ethically.” (Haggerty 2004: 393)

As a result of the expanding audit culture and oversight, Taylor and Patterson find that researchers “...experience ethical review as punitive, a process that posits them guilty by extension of their predecessors’ exploitation of the researched, and guilty until they receive institutional approval on their proposed projects” (Taylor and Patterson 2010: 13).

Kevin Haggerty argues that the results for social science research are far-reaching. Ethics review risks “homogenizing inquiry and narrowing vision, as scholars start to follow what they perceive to be the path of least institutional resistance” (Haggerty 2004: 412-413). The result, he argues, is that academics increasingly understand the term “ethics” to be synonymous with “bureaucratic hoop-jumping” rather than seeing ethics oversight as an opportunity to engage substantively with questions of ethical research conduct. “The authority of the ethics structure risks becoming more coercive than moral” (*ibid*: 410).

McMurphy, Lewis and Boulos likewise argue that researchers do not respect ethics committees or the process of ethics review. They challenge the authority and validity of ethics review, accuse ethics committees of “‘blatant misunderstanding’ of their research,” and perceive committees as obstructive in structure and intent (McMurphy, Lewis and Boulos 2013: 32).

Piecemeal solutions vs. nihilistic despair

The solutions proposed by scholars of ethics review regimes range from local accommodation and collaboration to nihilistic despair. Rena Lederman (2006b) argues that frustrated anthropologists need to “educate” ethics committees about anthropological research methods. Many others have similarly called for social scientists to join committees to facilitate the review and approval of social science research projects (for example, Israel 2004).

In contrast, Winlow and Hall argue that no amount of piecemeal, local solutions will change the broader system. It’s a structure that represents the philosophical order of our times. They see ethics committees as symptomatic of postmodernism, which reduces everything to parody, where we have lost idealism and a sense of progress. We’re structurally doomed to cynicism. They argue that “...the mere fact that the Law exists creates the space through which transgression can be enjoyed” (2012: 406). This angle of analysis fits neatly with Taylor and Patterson’s empirical finding that “subverting IRB/REBs becomes a point of solidarity between faculty and student” (2010: 11).

Winlow and Hall argue that, in this state of postmodern cynicism, we nevertheless look for transcendental narratives that will allow us to escape the “pervasive and dispiriting cultural cynicism of our times” (2012: 410). Thus we keep creating little social constructs that attempt to recapture the big truths that we’ve lost. One of these is the university ethics committee, which hopes to recapture the fantasy that there’s such thing as inherently ethical research, rather than just multiple approaches that researchers might take, each of which advantages or disadvantages a particular social group or set of individuals.

Wallowing in postmodern cynical despair is not, however, a useful approach to learning and teaching. In fact, while this Fellowship found many examples of bureaucratic obstacles to a research-led curriculum, I also found a handful of cases where people had made the bureaucracy work, and where exciting student research was happening as a result.

This Fellowship, therefore, aims to identify best practice models and provide recommendations for how they can be applied across Australia.

I begin from a fundamental assumption, perfectly encapsulated in a quote from one of my research participants, Professor Mark Israel at the University of Western Australia:

“We want a research ethics system that supports researchers who are working on the cutting edge. And that means we’ve got to have the capacity to support risk-taking. Not stupid risk-taking, not unethical risk-taking, but you can’t just force researchers to fall back on tried-and-trusted systems....You don’t want a risk-averse ethics committee. You want an ethics committee that actually tracks that frontier and supports people going beyond the existing frontier.”

Chapter 2: Aims and Methods

Aims:

The Fellowship proposed to investigate whether and how students are able to conduct original research in social science disciplines, and what barriers teachers and universities face, in particular the barrier of obtaining ethics clearance for research projects involving human beings. Traveling around Australia, I aimed to document a range of ways that institutions are handling the ethics review of student research, pinpoint what works and what doesn't work (that is, whether student research being facilitated or not), and identify the advantages and disadvantages to each approach (from the perspective of teachers, universities, and students).

I would then use this research to distil a best-practice approach or approaches, and communicate policy recommendations back to study participants and to ethics administrators at Australian universities, sharing examples of what works and what doesn't.

This approach goes beyond applied research. In the process of interviewing and discussing the issues with colleagues across the country, I hoped to build a network of people interested in ethics review of student research. In so doing, I aimed to create a kind of critical mass of thinking about problems, solutions, and opportunities for innovative learning and teaching.

Method:

In 2012-2013, I travelled around the country, visiting 14 universities from every state and territory, both public and private institutions, group of eight and others, and in urban and rural (or small city) settings.

I formally interviewed 40 people. Seventeen of these were ethics committee chairs or administrators; six were ethics committee members or had previously served on an ethics committee, and 17 had never served on an HREC.

My interview instrument used the same set of seven questions (see Appendix B), but also allowed space for open-ended discussions about how procedures work at their institution, identifying research-led teaching methods in different disciplines and innovations in both teaching and administration. Additionally, I had informal discussions with several dozen more people who weren't formally interviewed but whose insights helped to structure my thinking about problems, structures, and opportunities.

I used snowball sampling to identify leaders in research-led teaching at institutions across the country. Colleagues with an interest in undergraduate research directed me to people who were innovating in their teaching or in the structures that facilitated teaching in a research frame. I sought to speak with people from a wide range of disciplines that conduct human research, and my interlocutors had backgrounds in anthropology, applied ethics, bioethics, biology, business and economics, chemistry, creative arts, criminology, cultural studies, education, engineering, forensics, history, human resource management, immunology, industrial relations, law, linguistics, medicine, nursing, political science, pharmacology, philosophy, physiology, psychology, public health, and sociology.

Yet my Fellowship evaluator, Professor Colin Thomson, quickly identified a methodological flaw in this top-down approach. Focusing my attention on administrators

and teachers who were innovators in the research-teaching nexus would only allow me to understand formal policies and the perspectives of those teachers who were savvy and energetic enough to deal with the barrier of institutional ethics review.

What this approach would *not* show was an on-the-ground perspective of what was happening in departments where:

- (1) teachers were not savvy or energetic enough to navigate those bureaucracies, or
- (2) teachers were deliberately flying below the institutional radar (that is, avoiding interacting with ethics review institutions) but possibly still having students do research projects as part of their teaching, or
- (3) recent changes in ethics review requirements have led teachers or departments to halt existing research-led teaching curricula because they don't have the resources or motivation to deal with changing requirements.

In short, my evaluator and I started to wonder: what if there were departments which originally had students doing research projects, but when they were told that they had to submit these for ethics review (something which has only happened in many disciplines over the past decade), they either stopped doing those projects or continued them without telling their ethics committees? Or what if there were teachers (particularly in the creative arts) who do not believe that student research projects should be subject to ethics review? High level administrators and ethics committee chairs would likely not be aware of such circumstances, so my research design could not answer the important question of what is happening at this level. And yet this is essential to document if we are to understand the impact of the expanding scope of ethics review on research-led teaching.

Leaders in research-led teaching are often those who have built good relations with their ethics review bureaucracies and managed to make the system work for them, but they are not necessarily “typical” of what teaching looks like at their institution. (In my own department, for example, when I proposed to teach research methods by having my students do their own research projects, several colleagues laughed at me and sympathetically -- and pessimistically -- wished me good luck in getting ethics approval for these student research projects.)

Thus I sought an extension to the grant so I could interview not only teaching leaders and innovators, but also those who *hadn't* managed to navigate the bureaucracy, who were either having their students do research without ethics approval, often quasi-secretly, or who had given up on the possibility of student research because they found the bureaucracy too difficult or time-consuming to navigate. To reach such people, I “cold-contacted” colleagues from a range of disciplines without having any idea whether they made student research part of their teaching curriculum.

Using purposive sampling and engaging in long, in-depth conversations with participants means that my sample size was relatively small and non-representative. For this reason, the results are not reported as numbers and percentages. Rather, they represent a range of issues, structures, innovations, problems, and success stories that can be found at universities across Australia.

In the coming chapter, I will first narrate six case studies that I consider to be representative of the range of scenarios that characterise the relationship between ethics review and research-led teaching. (All names provided are pseudonyms.) In the following chapter, I distil these case studies and the other scenarios I encountered during my Fellowship into a set of findings, arranged by theme. I then identify best-practice approaches and outline policy recommendations for institutions.

Chapter 3: Case Studies

Case study 1: Giving up on student research because of bureaucracy

Samuel is the honours coordinator for the Anthropology Department, and he says that “nothing is allowed as part of the teaching that would attract the requirement for an ethics approval.” He reports that, several years ago, Anthropology undergraduates used to conduct research projects as part of a research methods course. But because of difficulties with the HREC, and the lengthy time it took to have projects reviewed, the department decided to halt undergraduate research.

“It was decided that it was just too hard. So at that point the research project as part of honours was dropped and they were told that they must not do anything in their honours year including for their dissertation that would attract the need for an ethics approval. Students are pointed away from doing anything that may attract the need for ethics approval. We just say don’t do it.”

Part of the problem, he says, is an ethics committee that doesn’t understand the discipline of anthropology or its research methods.

“We’ve had long difficulties with the ethics committee, in the ten years I’ve been here there’s been ongoing discussion and they don’t seem to understand what social sciences are, what anthropology is. The ethics committee is so geared toward sciences and if they’re thinking about people at all, it’s in medical science terms... Its forms and applications process are actually not pitched at the discipline, and therefore can have very little impact upon the ethical standards of work in that discipline.”

Ironically, at Samuel’s institution I also interviewed a research ethics administrator who boasted of the wide range of human research that students undertook across the university and the efficiency of their ethics review system.

Case study 2: Ethics review within departments

Paul runs a departmental ethics committee. The Psychology Department incorporates student research into their undergraduate teaching in all years of the degree. The projects are usually only for teaching purposes, though sometimes teachers want to use the data collected for their own research (in these cases, students are asked to give “double consent” and can confidentially opt out of having their data used by their teachers to avoid a conflict of interest and pressure to participate).

Lecturers gain approval for a project through the ethics committee and students act as “practice researchers”. The responsibility for the ethical aspects of the research remains with the staff member, while students act like research assistants in that they collect the data. In other cases, students seek ethics approval for their own research projects. Most of these projects are low-risk, and all low-risk psychology applications are dealt with by a Psychology Department HREC subcommittee.

The Psychology Department has created tailor-made ethics application forms that are specific to the types of research methodologies they typically use. Because they specifically address clinical psychology research methods and thus are not burdened by irrelevant questions about other disciplinary methodologies, these application forms are incredibly short and concise. The shortest applications, Paul reports, are two to three pages long, plus a participant information sheet; more complex ones are only four or five pages long. (In comparison, the university-wide ethics application form is typically thirty pages.)

Commenting on his simplified ethics application forms, Paul says, “You’re better off not being too officious, not being too bureaucratic with simple applications. That way you actually get more compliance. You actually get better approval processes I think. When it becomes too difficult people say, ‘Bugger, that’s too hard. I won’t do it.’”

These short application forms are reviewed with extraordinary rapidity. The subcommittee receives applications on a rolling basis, so there are no deadlines and formal meetings, with members consulting with each other online or by phone when necessary. Lowest-risk applications are reviewed only by the subcommittee chair, and he provides feedback to the applicants within a day of receiving most applications. More complex applications go out to two or three additional reviewers and for these it takes about a week to review. On average, ethics applications that go through his subcommittee are reviewed in only three days.

The department incorporates research ethics training into the curriculum at all levels: undergraduate, honours, and masters. Students are also trained in what constitutes low-risk research, so they can know what application forms to use for their project. Greater than low-risk research goes to the university HREC for review. The HREC audits Psychology Department low-risk projects quarterly, to ensure they are meeting the low-risk guidelines.

In contrast with most HREC chairs, many of whom were aware that a lot of research took place without undergoing ethics review at their universities, Paul says that the clarity of procedure results in full compliance with ethics review processes in his department. “The slower the bureaucratic process the less compliance you get. Being efficient as an ethics committee and directing your attention where it is needed, to potential threats and genuine ethical research, leads to high participation rates. We’ve got 100%. Every application here goes there. Everyone does it.”

Case study 3: Working “under the radar” without formal review

Rasha and Christopher are psychologists who have their first and second-year students collect data as a learning and teaching exercise. For example, they’ll ask students to conduct interviews with family members and friends, or the students themselves fill out a questionnaire, and then they pool the de-identified data into a master dataset for all the students to analyse as part of a learning exercise. They put tight constraints around the research to ensure that there is only negligible risk: for example, they don’t interview anyone younger than 18, and the data are not retained and the results never published.

This approach leads to better student engagement, Rasha argued, “because it’s something that’s real to them. You’re not giving them -- which I know some statistics and research methods courses do -- datasets that they just go and do which don’t mean anything to them. The whole process of designing and then going and collecting the data...”

Christopher finished her sentence: “It makes it more authentic, doesn’t it?”

While their processes replicate projects that have formally received ethics approval - for example, they give out information and consent sheets to participants -- these student research projects do not undergo university ethics review. Rasha and Christopher have periodically discussed the possibility of formally applying for ethics approval, but each time have decided that it would kill the project.

If the university found out what they were doing and required them to get ethics approval, they would be prepared to argue that these projects don’t need approval because “we’re doing teaching, not research,” but they worry nevertheless about “ethics creep”. “You know, this year they’re asking for a little sign off; next year they want a three-page proposal; after that they want a fourteen page proposal; and then the next year it’s ‘Sorry, you can’t do that regardless of what you submit.’” If they had to get ethics approval for these teaching exercises, “I wouldn’t do it anymore,” Christopher said flatly. “I’d just give [students] a made-up dataset.”

Like a number of other interviewees engaged in innovative research-led teaching, they both expressed an anxiety that as a result of my Fellowship, their students’ research projects will be closed down.

“One of the concerns with your research,” Christopher comments, “although I’m really curious to find out what the status of this is across the country, is that it could open up a can of worms.”

Rasha laughed. “Yes, we don’t want it to come back and bite us on the bum!”

Christopher continued, “I suppose it makes me a bit nervous because I know that the ethics committee can overreach, in my opinion.”

Rasha added, “we’ve worked really hard to get students engaged in research methods, in the undergraduate curriculum, because it’s only recently that we’ve done a lot of this, and I would see it as a real backward step, in terms of student learning.”

“And it’s not like we’re doing this in a vacuum, either!” Christopher noted. “I mean, there’s a huge body of literature around best practice in engaging students in research. ... But even though I would defend it, I would do my best to defend it, I still don’t want to be in a position where I have to.” He stage whispered, “It’s a waste of time, really!”

Case study 4: Working with HRECs to create new forms

Barbara teaches human-computer interactions. For a long time she had had students do small research projects that involved gathering some data from humans, mainly observing how people interact with computers and testing ability.

“For many years I did nothing, I just didn’t tell anybody I was doing it, because I asked a question and found out the answer was too hard. So I decided that it probably wasn’t worth trying to take it on. But when I was asked to join the Faculty Ethics Committee, I started to realise that we should have been.”

She found one ethics application form designated for class research projects, but it wasn’t suited to capture the kind of information about the research her students were doing. “And because I was on the ethics committee, I felt there was a bit of responsibility on my shoulders to do it properly.” So she drafted a new form that would ask the right questions about her students’ research projects. She wrote up her unit using this trial form and then workshopped it with the ethics committee. She then trialled the form with teachers from two other wholly different disciplines: pharmacy and social work.

“And so through a process of collaboration and negotiation, we’ve now come up with something that a couple of other people have trialled, and so we’ve got a form that fits a range of different activities at undergraduate level where students are engaged in doing some sort of research work.”

Her university is one of only three universities out of the fourteen that I surveyed that have a distinct form for student research that occurs as part of the teaching curriculum.

Barbara points out that there are people who want to provide the best learning experience for their students and that means getting their students to do research. If there aren’t procedures clearly in place to facilitate this, “people will do it underground”. That creates risks for students and the university, but “if you make it accessible, people are actually quite happy to do the right thing,” she says. Well-created forms and review procedures, she argues, means that “it’s almost like a kind of peer review group.”

“I think when students actually get to do authentic research, in an undergraduate level, that gives them a much better understanding of what the nature of research is; it’s not something abstract and out there, it’s something they can do. I think they get to actually experience all aspects of research -- the good, bad and the ugly -- but also how to organise themselves. I’ve got a couple of students getting ready to do some feasibility testing with participants now, and when they started the process I had no idea how to recruit these people and stuff like that, but it’s been this gradual walking through, holding their hands, supporting them to do a whole lot of stuff that I think you can do much more effectively in an undergraduate project than what you

should be doing in a postgraduate project. So it's... enthusing students for what research can do, building the skills, but at the same time scaffolding it in such a way that they can be successful."

Case study 5: Innovative teaching in the shadow of fear

Jeremy, a lecturer in anthropology, teaches an undergraduate methods unit where over 100 students each year conduct an ethnographic field research project. His university has a separate ethics application form for student research as part of the teaching curriculum, and this form is, he says, "radically different" than the regular ethics application form for researchers. Among other things, it's shorter and "less onerous". In it, he explains why he is "suitable to monitor all those projects," highlighting his research experience, and obtains "umbrella" approval for the entire classroom, renewed every three years.

The projects are narrowly defined to avoid working with vulnerable or dangerous populations: children, for example, or people engaged in illegal activity. The first weeks of each semester are spent talking about research ethics, focusing particularly on confidentiality, security of data, privacy and vulnerability.

After receiving ethics approval for the entire class project, Jeremy and the tutors become proxy reviewer for student research projects. Students submit to him a research proposal, spelling out their methodology, arguing for the significance of the subject and the procedures they plan to use to study it. "I don't make them address a particular ethics form itself. I just want them to describe the process as fully and as accurately as they can. Then myself or the tutor can look at it and say 'Hey, red-flag on this one, that's a vulnerable population,' or, 'That student's a bit immature to be doing this.' I try and get them to give me a good description of their project so then I can talk to them about what's good about it and what might be problematic in relation to the constraints we have about ethics." He avoids having students fill out forms in part because he wants to encourage a substantive engagement with ethical thinking rather than focusing on "arse-covering" and risk liability.

While Jeremy supervises a huge number of independent undergraduate research projects every year, he says he's never seen a case where student research was unethical or placed participants at risk. He says it comes down to "peers and mentoring. They come out of a research culture that values faithful and ethical engagement with others.... You want to turn out graduates who are politically astute and ethically astute and who will think about projects in a way that are unproblematic to begin with. That's why we put a lot of work into this stuff in our undergraduate methods. Good research can sometimes be risky, but there are ways to make risky research ethical."

In fact, while his research guidelines generally constrict the types of projects students can do in order to minimise risk, he has occasionally allowed certain students to engage in riskier projects. One student, for example, did a research project with street people, "a small community of people who are regular alcohol and drug abusers and quite violent. But she had an in with those people. She knew them and she was a mature student. I thought, 'I wouldn't let a nineteen year-old do this, but okay.'" When I asked Jeremy if the research project worked out, he said, "It did. It was fine."

By all indications, Jeremy's methods class is exemplary. Undergraduates are engaging in original research projects, learning about ethnographic research, and thinking deeply about research ethics. He describes extraordinary levels of student enthusiasm. Yet even though Jeremy has the approval of his ethics committee, he fears the university will eventually shut down the student research. Even though I observed that his was a best-practice model, the very type of project that I aimed to highlight and publicise for others to emulate, he was reluctant to let me use his real name and university, for fear of backlash.

"I'm hoping it's not one of those things that people just haven't noticed. You know when you have a good thing and bureaucrats notice them? Then they go, 'You can't do that.' I don't think it is that. I think for once somebody came up with a good idea. I just don't want to draw attention to something that may see now as an open risk. The risk assessment office... they would probably want to see some more formal documentation of the risk assessment I take on every single bloody project, which would kill the subject."

Chapter 4: Findings

Research-led curriculum is the best way for students to learn

My interlocutors consistently agreed that having students do research is the best way to learn, even when it wasn't bureaucratically feasible in their institution. As Peggy, a computer engineer, recounted,

“[My son] finished up working on a research project for the end of second year, and he just got so -- oh! Switched on! I've never seen him so engaged. It was just so exciting, to see a kid switched onto learning like that. And not a kid that had necessarily been what you'd call a typical successful student before he started university; he didn't really like school, and all of a sudden, this research project -- voluntarily, didn't have to do it! -- It's so great to see these students so switched on.”

Tim, an anthropologist, said, “Students, in their evaluations, often say that the most memorable work they ever do at uni is the [research project] that they've done.”

It wasn't only teachers who shared this opinion; a number of ethics administrators saw student research as essential to learning. Barbara, an HREC chair who said that dozens of class research projects get ethics approval every year at her university, argued, “[research] is part of the student learning process.... I think it should be an integral part of the learning process and be encouraged”.

Conflict between HREC administrators' and researchers' accounts

Case Studies 1 and 5 illustrate how there were often significant incongruities between HREC administrators' and researchers' accounts of how ethics review was implemented at an institution. At one university, the HREC chair reported that, for low-risk research projects, they aim to provide feedback to researchers within fourteen days. Non-low-risk projects, she explains, take longer because they go to a committee that meets monthly. But, in general, she says, their attitude is to encourage research as part of the teaching curriculum. “I see my committee as strict,” she commented. “We... look at [research projects] from all different angles. I'm sure the students don't like it,” she concluded, laughing.

At the same institution, one researcher commented, “[The HREC] makes my job almost impossible. For example, each year I co-supervise around eleven to thirteen year four students in their research project. I only meet these people in March, they have to be all done by October. Usually the ethics review process takes six months so it's almost impossible for them, for us, to do this work.”

Such conflicting accounts from ethics administrators and researchers were common. Many ethics administrators described systems that they thought were efficient and fair, yet when I interviewed staff members at these institutions, they reported that the ethics committee was so slow and obstructive that they'd either given up on having students do research or they were sending their students to conduct research without ethics approval.

Imaginations of risk

One of the most striking findings was the response I got to the question, “Does ethics review make student research more ethical?” Fewer than half answered this question in the affirmative.

I flipped that question around and asked, “Are ethics violations more likely to occur if student research does not undergo ethics review?” Again, the majority of respondents said no. Of those who said yes, many of them defined ethical research tautologically (“Not having ethics approval is itself a violation,” pointed out one ethics administrator), or in terms so trivial that I was astonished that someone could consider them matters of ethics (for example, one defined “unethical” student research in terms of ungrammatical or misspelled information forms).

The following interview question attempted to reconcile *imaginations* of risk and unethical research with the *reality* of it: “Can you describe a specific instance where student research was unethical or placed participants at risk?” I asked respondents to tell me if they’d ever so much as *heard* of anything through the grapevine -- it didn’t need to be anything they’d actually personally encountered themselves. I was thus casting a very wide net. Of the 26 respondents who answered this question straightforwardly, *only four* could describe instances where student research was unethical or placed participants at risk, and two of those were cases they’d heard of outside of Australia.

A few researchers described student research that could *potentially* have been unethical. For example, Deborah is an anthropologist who teaches a class on embodiment where students write critically about a personal experience. She has instituted her own procedures for vetting the projects that students proposed. She told me that, “One year a kid came up to me right before the deadline and said ‘I forgot about the sheet’ [that is, the sheet he had to submit to her, describing his research project]. He handed it to me and he was going to do a little shoplifting at some store and think about it phenomenologically, how this affects his body. I said, ‘I’m sorry, you want me to sign something for the university that says it’s cool to shoplift?’” The project was halted at that point, and she reported that in the several years she’d taught the class, there were no instances of research that went forward that was unethical or which placed participants at risk, even in the absence of university-level ethics review. (See also Potter [1993] for an account of what happens when sociology departments assign undergraduates to commit a “deviant” act and record the results.)

In short, there appeared to be a significant discrepancy between imaginations of risk and the actual risks entailed in student research, risks which could be effectively managed through close supervision by teachers.

Administrator perspectives on ethics review

Ethics administrators were often under-resourced and overwhelmed by the number of applications they received and the short time frames for turnaround sought by researchers. They often expressed frustration with researchers for not being better “organised” in applying for ethics approval well in advance of the start of their research projects.

Most administrators reported that they were aware that there was research -- both by staff and students -- taking place without ethics review. Only a few, however, thought that should be audited. It was the responsibility of researchers to seek ethics approval and administrators did not wish to be in the position of policing compliance. Most administrators thought that outreach was the best way to increase compliance.

Even bureaucratic administrators sometimes bemoaned the bureaucracy they were a part of. Beverly commented, "I was concerned about the amount of time that we were spending on quite low risk projects. But the HREC was reviewing them, and I was thinking, really, why are we spending so much time on this? These are essentially low-risk projects and yet we're spending an inordinate amount of time on these, surely the HREC should be focusing on high-risk projects".

Researcher perspectives on ethics review

Ethics review provides opportunities for ethical reflection

Chris commented, "I don't think it facilitates ethics very much. It facilitates a kind of clarity over what they are doing, how they do it, who they're going to talk to, and how they'll contact those people. It goes from some airy-fairy topic like 'I'd like to do research on how ice-cream is made, or something' into 'Oh, how would I do research on that?'"

The belief that the ethics review process forced researchers and students to reflect productively on research ethics was common amongst researchers and administrators. In fact, many of the respondents any who said "Yes" to the question about whether ethics review made student research more ethical qualified that by saying, "I think it makes them think about what they might be doing." In other words, it was the process of formal reflection on the ethics of their research project that made student research ethical, not (necessarily) the review process.

Ethics review is bureaucracy, divorced from ethical thinking

Many teachers and even some administrators expressed the view that ethics review was mere bureaucratic hoop-jumping, not a substantive process that ensured ethical research. "The form filling becomes something that you get approval to do and has little relevance to the research you will do," Chris, an anthropologist, argued. "In a way it becomes an exercise in bad faith."

The fixation on form and process rather than the substance of ethics review was inadvertently but provocatively illustrated when I was interviewing ethics administrators and chairs for this Fellowship. When I gave them my participant information and consent form, two participants took me to task for not including the file number of my ethics approval on my form. When I explained that Macquarie University did not require researchers to include this, they expressed surprise. I could not grasp how adding a number to this form would somehow make my research approach more acceptable.

In other cases, when I asked participants the question of whether they could think of an instance where student research was unethical or placed participants at risk, some cited

student research that hadn't gotten ethics approval as unethical -- a complete tautology, apparently unconnected to any actual risk or harm to participants.

It wasn't only researchers and teachers who regarded ethics review as meaningless bureaucracy. The chair of a humanities HREC commented cynically,

"I think human ethics approval is more about risk management at my university rather than aiming to teach. At my university, the committee... provides little resources in teaching students how to do research involving human subjects. There are sometimes seminars run by the faculty or the university ethics committees. But those seminars are basically on human ethics compliance. How to fill out the form and apply for ethics approval."

Ethics review fundamentally impedes research

One philosopher said, "A lot of people are really angry. That they feel that their research was compromised, that they feel that it's one more piece of bureaucracy, one more piece of time-wasting. No amount of time wasting is ever too much for a bureaucracy. If they hold up the project for three months, it just doesn't matter to them."

Many scholars of ethics bureaucracies have pointed out that ethics committees are rarely penalised for holding up a research project, but there *always* a penalty for letting a bad one through if the university and committee face bad press as a result. Structurally, then, ethics review is an impediment to research, if only in constituting a delay, and there are rarely incentives to speed review.

When I asked one psychologist and HREC member if ethics review made student research more ethical, Amy said, "I don't think so. I really don't. I just think it makes my job almost impossible. For example, each year I co-supervise [Year Four] students in their research project. I only meet these people in March, they have to be all done by October. Usually the ethics review process takes six months so it's almost impossible for them, for us, to do this work." Because that's so difficult, instead of having them do individual projects she instead gets prior approval for her own project and the students choose one of the pre-existing projects to work on. "It certainly doesn't improve the quality of the research or what students get out of it because rather than being involved in the development of the research plan they have to just buy into what I have already planned and designed."

Low-risk research is low-impact research

Others argued that the real impact of ethics committees wasn't in the temporal delay or the fact that some research projects never get approved, but rather in the fact that they encourage researchers and teachers to devise low-risk projects in order to avoid bureaucratic hassles. The result is watered-down, low-impact research. Amy observed that, sitting on her HREC, she's seen a number of cases where ethics review has "a damaging effect on the quality of research being conducted". She recounts having "witnessed occasions where people had really nice research proposals which were turned into not-so-nice research proposals because of ethical requirements". Karen, a sociologist who was generally quite supportive of ethics review processes, commented,

“When I was on the ethics committee, there was a real tendency for some of the lay people to be quite resistant to approve honours students from doing stuff on sexuality or death or mental health issues.... [the ethics review process] facilitates good research, thinking about things, looking after yourself and looking after your participants, but it may channel some students particularly honours and undergraduate students into much more generic, low-risk research that may actually not be all that interesting.”

Notably, throughout our interview Karen used the term “sensitive” rather than “risky” to emphasise that there was no risk assessment involved, but rather it was driven by the fear of the committee around particular topics, especially sexuality, depression and anxiety.

Mark Israel, a criminologist, said,

“You know, ‘Do no harm,’ is inappropriate; the harm needs to be justified by the benefit. There are justice issues around the distribution of harm and the distribution of benefits. And can you justify it? And I think some HRECs have worked on the basis that no harm should be done; I think that they don’t understand the lives of people you’re doing research with. So when you’re talking to somebody in a war zone who’s taking all kinds of risks, actually the additional risk imposed by talking about the regime to an interviewer may be quite small and one that they may be prepared to take in some circumstances.”

Tim, an anthropologist, said,

“We invited somebody from the local Board to come and address people and I was going to help people in the workshop. I was going to show them the forms and get them to think about ethics and look at little exercises and case studies. He came in to give some advice and he just basically said: Just avoid anything that has anything to do with conflict, ethnicity, nationalism, Aboriginals, anxiety, anything to do with trauma, gender, you name it. These are the key words that trigger this large process that could take much, much longer and therefore makes it unviable. Here were students who were almost crying because they had come to our programme with these plans about trauma, Aboriginal people, migrants, and this that and the other. [But] we worked around that and managed to keep most of their projects going.”

Ethics review protects institutions and students, not research participants

The claim that ethics review existed to protect universities and researchers as much as or more than research participants was a common view. Rudolph, an anthropologist, argued,

“[Ethics review] makes [research] no less ethical but makes it less honest. I think the way in which our form is weighted so much more towards risk aversion around institutional liability than it is towards ethnographic ethics. A lot of the questions are institutional arse-covering questions.”

Derek, a political scientist, commented,

“We did a questionnaire survey, back when I was pretty junior. Some dill read a bloody left-wing bias that wasn’t really there, but someone at [my university] had a

drizzle to the Vice-Chancellor probably and it came through to the Chair of the Ethics Committee. He said, 'I've got formally tell you off now.' It wasn't heavy. 'We realise where this has come from.' But it did alert me then to the fact that as a supervisor you've got to alert the students to the fact that this clears you from any potential legal issues.... the university will indemnify you if anything happens. It does give protection for the researcher."

Karen, a sociologist and HREC member, argued that ethics review protects students by keeping them out of potentially dangerous situations with research participants. As a result of her personal experience of being harassed by a research participant, her university "has a strong policy of doing things like asking researchers not to do any interviews in people's homes".

Disciplinary biases in ethics review

Teachers in the social sciences and humanities often saw a biomedical bias in the way ethics committees understood and evaluated research. Derek, the political scientist, said,

"We've applied a frame of references stemming more from the natural sciences and then if you like the harder social sciences that is just not applicable.... What I would like would be a separate lot of forms [appropriate to social science research and student research]. ... I've got students who work for senior echelons of national government who are going to go interview people who are former acquaintances, yet we put them through as though they are going to interview somebody who is a member of a vulnerable community or potentially has a psychological, not disorder, but you're prying into close things."

Punitive approaches vs. ethical capacity-building

A number of respondents saw ethics committees as punitive. Mohsin, a forensic scientist, commented,

"We've had a number of briefing sessions as researchers... And they very much use the 'we're going to scare the living daylights out of you' [tack], that 'if you don't do this properly you'll find yourself screwed to the wall.' They really use the scare tactics, the 'you're going to go to jail if you don't do this right', at least to start off with.... I deal with legalistic things all the time and I know how these things are written; these things are designed to be punitive rather than a quality assurance process."

Mark Israel, a criminologist, commented, "if we stop seeing research ethics governance as simply a review process and start seeing it in terms of capacity-building all the way through the student life cycle, by the time students become research higher degree students they ought to understand the major issues with the responsible conduct of research in their discipline. I think it is entirely reasonable for research ethics structures -- not just the committees, the structures within an institution -- to be supporting the development of advice all the way through curriculum.... That's not how many institutions think about curriculum, but it should be. You want the development of ethical conduct of research to be all the way through the curriculum."

Chapter 5: Best Practice and Policy Recommendations

Best Practice

Dedicated forms for student research in the teaching curriculum

One thing that emerged clearly during this Fellowship was the value of ethics forms that were dedicated to student research projects that occur as part of the teaching curriculum. Seven of the 14 institutions I visited had dedicated forms for student research.

There's an analogy with the disciplinary bias that many social scientists see in ethics application forms. When forms appear to be tailored to biomedical or clinical research, social scientists may go to great lengths awkwardly fitting their project into those forms, or they may choose to undertake research without ethics review (Wynn et al. 2014). Either way, they conclude that the institution doesn't know the right questions to ask about the particular ethical dilemmas that inhere in their research methods, isn't supporting their kind of research, and that the process is therefore irrelevant.

Similarly, while some leaders in learning and teaching are evidently going to great lengths to get ethics approval for their student research projects, many others are working without ethics approval or giving up on student research altogether. Having dedicated forms for research-teaching projects convinces teachers that human research is possible for students, even expected or desirable, rather than a struggle with bureaucracy which only the most determined will attempt to overcome.

That said, any review will act as an impediment to research to some extent. As Kathy, a biologist, explained, even dedicated processes can be difficult to implement.

"In principle, it's very good [to have dedicated processes for getting approval for class research projects]. In reality, it doesn't necessarily work, because you don't know how many projects you might need, you don't know from year to year what the class size is going to be, some classes might be a lot larger than you predicted from the previous year, and suddenly you need to find ten more projects for the students to do. ...And you need to have this umbrella approval beforehand. So what this [system] tends to do is to [make people] say 'We're not going to do projects. It's too hard, can't manage it.' ... ethics is just one small component of a large number of factors that prevent coordinators carrying out student research projects."

High-level institutional support

There is thus a clear need to have high-level institutional support and an institutional culture that values student research and is willing to make the effort to simplify systems to make this happen. Case Study 5, where Jeremy's anthropology class was a model of innovative research-led teaching but he was afraid risk managers might cancel student research, further illustrates the point. Even teachers who are backed up by a supportive HREC and who have dedicated forms and procedures for research-led teaching nevertheless live in fear that some risk-averse bureaucrat will kill innovation.

Even though seven universities had dedicated forms for student research as part of the curriculum, most of the people I interviewed had *no idea* that there was a dedicated review process for research-teaching projects or that it was possible to get approval at the class level for student research. In many cases, I only discovered the forms through browsing the university websites. Research offices, ethics secretariats, and learning and teaching committees need to open lines of dialogue about the possibilities for student research in the curriculum.

Ethics committees need to fundamentally conceptualise themselves as facilitating research, not hindering it. DVCs of research and teaching need to both send messages to administrators that research-led teaching is a goal, and encourage the simplification of systems to make this easier for both teachers and administrators, whose enthusiasm for research-led teaching often buckles under the weight of heavy bureaucratic workloads.

Case Study 2, where Paul's department had created vastly simplified application forms for particular psychology research methods, had an average turnaround time of three days, and reported 100% compliance with ethics review, illustrates that the more simplified ethics review is, the more researchers and teachers will want to participate in the process.

Focus on capacity-building, including online training

Ethics administrators often went to great lengths to provide outreach to classes engaged in research. Kandy White at Macquarie University, for example, offers guest lectures in any unit where students are going to undertake research. Such outreach builds relationships between ethics committees, teachers, and students. Researchers know whom to consult when they have questions about research ethics and bureaucratic processes, and committees have more respect for researchers when there's a face-to-face relationship.

But having ethics experts available for consultation and training in every classroom is a heavy burden for ethics administrators and committee members, who tend to be under-resourced and overworked. One way that some institutions reach a large number of students is through online training in research ethics to develop capacity for ethical thinking.

Macquarie University, for example, offers a free online training program (http://www.mq.edu.au/ethics_training) that introduces students to the particular ethical dilemmas that can arise in qualitative research in the social sciences, humanities, and psychology. The module is built around real-life case studies, including both classic ethics controversies and current debates (such as the debate over the 2006 establishment of the Human Terrain System, a U.S. Army program that pairs social scientists with military ground forces in Iraq and Afghanistan).

The Macquarie University website is free and Creative Commons-licensed for non-profit use; anyone can view use it, assign it in class, use it to build lecture slides, or adapt it to create their own ethics resources. In 2009 it was adapted by the Australian Dental Association Victorian Branch and the University of Melbourne Dental School for use in training dental researchers (see <http://www.evident.net.au/OureviDent/Training/HumanResearchEthicsTraining/tabid/140/language/en-US/Default.aspx> for their online adaptation).

The University of Wollongong similarly has an online research integrity training program (<http://www.uow.edu.au/research/rso/ethics/human/training/>), as does Monash University (<http://www.cems.monash.org/online-ethics-training-course.html>).

☐ Institutions must view their ethics training in terms of capacity-building. Punitive, coercive approaches to ethics review results in teachers and students regarding the process as substance-less bureaucracy rather than a meaningful engagement with ethical thinking.

As one participant pointed out, ethics training for HREC members often takes a “spot-the-problem” approach, with trainees given hypothetical research projects and asked to identify where they’ve gone wrong. The resulting structural flaw is that committees tend to look for problems instead of focusing on capacity building, and see their role as that of critics, rather than peers engaged in a productive dialogue about the ethical issues surrounding a particular, unique project.

Ethics review situated within departments

And finally, what stood out clearly when I was talking to those who were most critical of ethics review was a nostalgic remembering of what ethics “used to” mean: a time when “ethics” wasn’t synonymous for “bureaucratic nonsense,” when it was governed by professional codes and personal integrity, when researchers debated amongst themselves about what ethical research might look like, without the oppressive impediments of bureaucracy, and without inappropriate advice from people in other disciplines.

One solution to the common criticism that HRECs don’t understand disciplinary research methodologies is to situate ethics review within departments. Many Australian universities have created processes for reviewing low-risk research at the faculty or school level, but the single best-practice case that I identified during this Fellowship was that of Paul, who had made ethics review even more local and specific to his discipline. By instituting ethics review in his department, and by developing short ethics application forms tailored to the disciplinary methods used in his department, he engineered a process where he was able to review applications and provide feedback in an average of three days (where many institutions took months).

There are obstacles to locating ethics review in departments and disciplines. Current NHMRC guidelines on HREC structure (National Statement section 5.1.30) specify that, in addition to having two members with “current research experience that is relevant to research proposals” being considered by the committee, one third of an HREC must be composed of members from outside the institution. It must also have: two lay people, one man and one woman, who are not currently engaged in research; it must include one person with experience in professional care (for example, a nurse, doctor, or allied health professional); and it must include one lawyer and one pastoral care member (for example, an Aboriginal elder, minister). At first glance, this makes it sound impossible to institute ethics review at a department level. Few departments have ready access to a healthcare professional, lawyer, and pastoral care person, none of whom are affiliated with the university.

Nevertheless, Case Study #2 and the fact that many universities have already overcome these restrictions by establishing subcommittees at Faculty or School levels,

which are answerable to and audited by the larger university HREC which meets these National Statement guidelines, suggests that it would be entirely possible to situate ethics review in departments, and to create forms that are specific not only to student research as part of the curriculum but also to particular disciplinary methods.

It is even possible to imagine instituting full HRECs that meet the National Statement 5.1.30 guidelines in departments. Institutions could recruit external HREC members to act as consultants to multiple departmental ethics committees. They could act as roaming members who provided input into individual department ethics meetings when and as needed -- perhaps joining meetings via VoIP teleconference, or providing written legal / medical opinions to the chair, advice which could then inform the substantive discussions about ethics within departments. The role of pastoral care committee member could be an Aboriginal elder-in-residence whose role on departmental ethics committees would simultaneously serve the goal of bringing Indigenous perspectives into the university.

The benefits of locating HREC review within departments are many. In addition to addressing researcher complaints that committees don't understand their disciplinary methods, it would also decrease the workload of ethics secretariats, which are increasingly becoming overloaded with ethics review work as universities try to increase their research activity. It could dramatically improve the efficiency of the ethics review process. Instead of waiting for a committee to meet every month, departments could organise to meet as often as needed. Departments that have a lot of applicants -- particularly honours and masters students at particular times of the year -- could schedule extra meetings as needed.

In a system where every department has an ethics committee, and everyone has to be prepared to serve on the ethics committee, universities would have to set up a system for everyone to get trained in research ethics and the National Statement. It could be part of the induction of new staff, and ongoing training for existing staff. The result would be universities that are uniformly fluent in human research ethics codes.

And finally, holding committee meetings in departments increases the likelihood that ethics reviewers and researchers would meet face-to-face, where committee members wouldn't feel empowered to make insulting comments about researchers, and where researchers wouldn't tell horror stories about monstrous bureaucracy stifling research. Face-to-face discussions, rather than encounters with faceless committees that appear to have coercive and punitive powers, would reframe thinking about ethics as an ongoing conversation and debate about mutual obligations that inhere in the research relationship instead of synonymous with bureaucratic nonsense, substance instead of form.

Policy Recommendations:

Building on these best practice models, there are many ways that individuals at all levels of the institution can help be drivers of change.

University executives

Members of a university's executive can communicate to their human research ethics committees (HRECs) that their mission is to facilitate innovative research, including student research. There is a widespread belief amongst researchers and teachers that

HRECs are inherently conservative. They need not be, but when researchers and administrators alike fear being shut down by risk-averse bureaucrats, high-level leaders at the institution need to broadcast their support for risk taking and for staff who want to go beyond the existing frontiers in research and teaching.

One way for institutional leaders to communicate their willingness to expand the scale of research at that institution is by providing financial and organizational support to HRECs to enable them to deal with the scale of expanding research and ethics review.

Ethics committees

Heads of ethics secretariats and HRECs can adopt dedicated forms for student research, conveying to teachers that human research by students is not only possible but expected and normal at their institution. Sample forms can be accessed at www.teaching-research-ethics.com.

Heads of HRECs and ethics secretariats should also reach out to researchers and teachers, both to communicate the possibilities of research-led teaching but also to understand their experiences of ethics review, to thereby close that gap between administrators' and researchers' perceptions of the review process.

Heads of departments, schools, and faculties

Heads of departments, schools and faculties can negotiate with their HRECs to decentralise ethics review for low risk and student research at the faculty, school, or departmental level. The advantages of decentralisation are many: it relieves overworked central HRECs, thus potentially enabling faster review. Local committees are less intimidating and less of a "black box" of faceless bureaucracy when they are staffed by familiar colleagues. Centralised committees are often perceived as being divorced from the reality of discipline-specific research, whereas local review provides a concentration of discipline-specific expertise, which can improve the review process for researchers and teachers. Situating ethics review in departments and schools also means more people engaged in ethics review, which will expand institutional capacity for ethical research planning and debate.

Teachers

Teachers can build capacity for ethical thinking in their students by incorporating discussions around research design and human research ethics debates into their teaching. A number of free, online resources are available to train students in research ethics (see www.teaching-research-ethics.com) and can be adapted for use as teaching materials (for example, lecture slides).

Teachers can also propose dedicated forms to their HRECs and work with committees to adapt them to specific institutional and disciplinary contexts. Many of the ethics secretariats that handle the bureaucracy of ethics applications are underfunded, and what appears to be conservatism is really just an ethics secretariat that is too overworked for innovation. Teachers can launch innovative processes from below by proposing change and collaborating with their committees to achieve it.

Chapter 6: Disseminating Results

Building a network

The first step in disseminating results was to report results back to all participants. I e-mailed drafts of this final report for their review, and asked the people who featured in the case studies and best practice accounts to review my narrative, offer any corrections, and tell me whether or not they want me to use their real names and identify their universities in publications resulting from this Fellowship. I then submitted information about the Fellowship to 85 ethics administrators and HREC chairs across the country.

The Fellowship website (<http://www.teaching-research-ethics.com>) links to blogs, publications, ethics training resources, and best-practice forms collected during the Fellowship.

The research component of this Fellowship was merely the first step in building a network of people interested in reforming ethics review in order to facilitate student research as part of the teaching curriculum. Many of the teachers and administrators interviewed during this Fellowship have joined the Teaching Research Ethics Network, a group of 24 individuals from 14 institutions. The Network communicates via e-mail and listserv, and uses the website as an online hub for sharing resources. If you would like to join the network, please contact lisa.wynn@mq.edu.au to be added to the network.

Disseminating Fellowship results

I was invited to join the International Steering Group for the Australasian Conference of Undergraduate Research (ACUR), one mechanism for disseminating research results.

In December 2014, I was invited to join the NHMRC's Australian Health Ethics Committee (AHEC) Working Group to review Section 3 of the National Statement on Ethics Conduct in Human Research. This is an exciting opportunity to influence future directions of the country's research ethics code. The working group has welcomed input from the Teaching Research Ethics Network on this part of the National Statement and how it impacts teachers and administrators, specifically as pertains to students doing research, and whether there any discipline-specific issues that affect teachers' ability to deliver a research-led curriculum which are not matters of local implementation at their institution but rather are matters of the language or content of the National Statement.

I was also invited to deliver the plenary address at the Australasian Ethics Network annual conference in December 2014 at the University of Sydney, where I presented the results of this Fellowship. In front of an auditorium full of ethicists and ethics administrators from across Australia and New Zealand, I made a case for the value of incorporating research into all levels of the undergraduate curriculum and argued for department-based ethics committees and simplified review procedures to facilitate a research-led curriculum.

Two journal articles are now available online and print versions will be published in 2016 / 2017: one, in the Journal of Empirical Research on Human Research Ethics, describes the research results, and the second, in the Australian Journal of Anthropology, calls for anthropologists to reform ethics review by situating review processes in departments.

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Appendix A

Certification by Deputy Vice-Chancellor, Academic

I certify that all parts of the final report for this OLT Fellowship provide an accurate representation of the implementation, impact and findings of the project, and that the report is of publishable quality.



Name:

Date: 7 January 2015

PROFESSOR JOHN SIMONS

Appendix B: Questionnaire

Interview Schedule

Below are the seven questions I asked in the formal interviews:

1. How does your university handle the ethics review of student research? Does student research get reviewed in a particular way or not, or does it just go through the same procedures that staff research would be evaluated by?
2. What do you think about that policy or procedure? Do you think it facilitates or hinders student research as part of the teaching curriculum?
3. Do you know of anyone else in your department or your school that you know of who uses student research projects as part of their teaching? You don't need to give specifics or names, but how do they make that work?
4. Do you think ethics review makes student research more ethical?
5. Do you think that research ethics violations will occur if student research projects do not undergo ethics review?
6. Do you know of any case where student research with humans was unethical or placed participants at risk? And I don't need to know whether it happened at this institution or elsewhere, I don't need any names or identifying information, but I'm trying to get at real cases and whether there are any that you know or have heard of where student research has put participants at risk.
7. If you were doing this research project, is there any question that you would ask people that I have not asked you?

Appendix C: Links and Resources

Free, online human research ethics training resources:

- Macquarie University's Human Research Ethics for the Social Sciences and Humanities Online Training: http://www.mq.edu.au/ethics_training
- Wollongong's Online Research Integrity Course: <http://www.uow.edu.au/research/rso/ethics/human/training/>
- The EviDent Human Research Ethics Training module <http://www.evident.net.au/?TabId=163>

Fee-paying human research ethics training resources:

- Griffith University's Research Ethics Manual (GUREM) developed by Dr Gary Allen, available for university license: <http://www.griffith.edu.au/griffith-enterprise/for-business-and-government/access-our-intellectual-property/griffith-university-research-ethics-manual>. Booklet 17 addresses research conducted by students for learning and teaching purposes, teaching evaluations, and research outputs from "outside the scope" and "exempt from review" activities.
- Monash University's Online Ethics Training Course 2.0: <http://www.cems.monash.org/online-ethics-training-course.html>.

Ethics application forms that are specific to research in the teaching curriculum:

- QUT Academic Unit Application Kit: "For academic units that require students need to complete a short-term research project, like research methodology or undergraduate design."
https://secure.qut.edu.au/research/qut/ethics/human/HumanEthicsNegLowRiskAppKit_AcademicUnit.zip
- La Trobe Teaching Practical Classes and Laboratory Exercises Application: http://www.latrobe.edu.au/_data/assets/pdf_file/0003/259302/Teaching_Practical-Classes-and-Laboratory-Exercises-Application-3.3.14.PDF
- UWA Coordinators Application Form: http://www.research.uwa.edu.au/_data/assets/rtf_file/0005/2479055/Course-based-Ethics-Approval-Coordinators-Application-V1-2014.rtf

- Flinders Class Project Ethics Application Form:
<http://www.flinders.edu.au/research/researcher-support/ebi/human-ethics/resources/forms.cfm> - see: Class Project Example Ethics Application (DOC 627KB)
- University of Melbourne Project Application Forms:
http://orei.unimelb.edu.au/sites/default/files/public/human-ethics/RC_Human_Program.pdf and
http://orei.unimelb.edu.au/sites/default/files/public/human-ethics/RC_Human_Project_in_Program.pdf
- Griffith University Course Clearance Form:
http://www.griffith.edu.au/_data/assets/file/0011/395732/Course-Application.rtf