



TITLE	102: Activities Requiring REB Review
SCOPE	The activities of the Research Ethics Boards operating under the direct authority of the University of British Columbia
RESPONSIBILITIES	The Vice-President, Research & Innovation, delegated to the Director, Research Ethics, all Research Ethics Board (REB) Chairs and members and all REB Office Personnel
APPROVAL AUTHORITY	The Vice-President, Research & Innovation
EFFECTIVE DATE	May 2018
Supersedes documents dated	May 2011, April 2010, July 2003

1.0 PURPOSE

The purpose of this standard operating procedure (SOP) is to describe specific research activities that require REB review, and conversely, those activities that do not require REB review.

2.0 DEFINITIONS

See Glossary of Terms.

3.0 PROCEDURE

All research involving human participants and all other activities which even in part, involve such research, regardless of sponsorship, must be reviewed and approved by a UBC-affiliated REB or pursuant to an executed Ethics Review Agreement. No intervention or interaction with human participants in research, including recruitment, may begin until such an REB has reviewed and approved the research protocol, consent document and recruitment materials. Specific determinations as to the definition of “research” or “human participants” and their implications for the jurisdiction of the REB under University of British Columbia policy are determined by the REBs. Determination of exemption from REB review must be based on regulatory, guideline and institutional criteria.

3.1 Research that Requires REB Review

3.1.1 “Research” is defined as an undertaking intended to extend knowledge through a disciplined inquiry or systematic investigation (including pilot studies, exploratory studies and course-based assignments).¹ The following requires ethics review and approval before the research commences:

(a) All research involving human participants

(b) All research involving human biological materials (as well as human embryos, fetuses, fetal tissue, reproductive materials and stem cells). This applies to materials derived from living and deceased individuals;

The following are examples of some REB types of research involving human participants:

- administering a drug, taking a blood sample, doing a test or performing a procedure, clinical, therapeutic or otherwise, upon the person of himself/herself or someone else, for research rather than treatment;
- asking people information whether by telephone, letter, e-mail, internet, survey, questionnaire or interview;
- using material derived from human biological materials, cadavers, tissues, biological fluids, embryos or foetuses,
- using non-public records that contain identifying information previously gathered about anyone, either directly or indirectly;
- using information previously gathered about anyone, (e.g., secondary data analysis);
- observing anyone’s responses or behaviour, either directly or indirectly.

3.1.2 In addition, UBC REB review is required when the research is:

- conducted by members or associated members of the University acting in their University capacity, including but not limited to faculty, emeritus faculty, staff, sessional instructors, clinical professors, administrators, students, visiting or adjunct scholars, fellows paid or unpaid associates and any other person associated with research at the University;
- conducted with the authorization of the University using resources (including but not limited to space that is under the administration of the University and academic space at affiliated teaching hospitals) that have been provided by the University but that are not generally available to the public; or
- in need of research review by the University pursuant to the terms of an affiliation agreement with another agency.

3.2. Research Exempt from REB Review

3.2.1 Research that relies exclusively on publicly available information does not require REB review when:²

(a) the information is legally accessible to the public and appropriately protected by law;

(b) the information is publicly accessible and there is no reasonable expectation of privacy;

3.2.2 REB review is not required for research involving the observation of people in public places where:³

(a) it does not involve any intervention staged by the researcher, or direct interaction with the individuals or groups;

(b) individuals or groups targeted for observation have no reasonable expectation of privacy; and

(c) any dissemination of research results does not allow identification of specific individuals;

3.2.3 REB review is not required for research that relies exclusively on secondary use of anonymous information, or anonymous human biological materials, so long as the process of data linkage or recording or dissemination of results does not generate identifiable information;⁴

3.2.4 The opinion of the REB should be sought whenever there is any doubt about the applicability of the Tri-Council Policy Statement and UBC Policy 89 to a particular research project.

3.3 Activities Not Requiring REB Review

3.3.1 Activities outside the scope of research subject to REB review may still raise ethical issues that would benefit from careful consideration by an individual or a body capable of providing some independent guidance, other than an REB;

3.3.2 Quality assurance and quality improvement studies, program evaluation activities, and performance reviews, or testing within normal educational requirements when used exclusively for assessment, management or improvement purposes;⁵

3.3.2.1 Where data is collected for purposes set out in the preceding section (3.3.2), but later proposed to be used for research purposes, such use may be considered

secondary use of information not originally intended for research, which would require research ethics review in accordance with UBC Policy 89,⁶

3.3.3 Creative practice activities, in and of themselves, do not require REB review. However, research that employs creative practice to obtain responses from participants that will be analyzed to answer a research question is subject to REB review.⁷

4.0 Failure to Submit Project for REB Review

The implications of engaging in activities that qualify as research that is subject to REB review without obtaining such review are significant. Results from such studies may not be published unless REB approval was obtained prior to collecting the data. In addition, conducting research without REB approval can constitute research misconduct in accordance with the provisions of UBC Policy 85⁸. It is also against policy to use that data to satisfy thesis or dissertation requirements.

If an investigator begins a project and later finds that the data gathered could contribute to generalizable knowledge, and has changed in some fashion as to now require REB review, the investigator should submit a proposal to the REB for review as soon as possible. The UBC REBs will not review or grant approval for research that has been conducted without approval. If the REB does not approve the research, data collected cannot be used as part of a study, thesis or dissertation nor may the results of the research be published.

5.0 REFERENCES

1. *The Tri-Council Policy Statement: Ethical Conduct for Research Involving Humans*, Article 2.1:
http://www.pre.ethics.gc.ca/eng/policy-politique/initiatives/tcps2-eptc2/chapter2-chapitre2/#ch2_en_a2.1
The Tri-Council Policy Statement: Ethical Conduct for Research Involving Humans, Article 6.11:
<http://www.pre.ethics.gc.ca/eng/policy-politique/initiatives/tcps2-eptc2/chapter6-chapitre6/#toc06-1b>
UBC Policy 89, Section 7.8:
<http://universitycounsel.ubc.ca/files/2012/06/policy89.pdf>
2. *The Tri-Council Policy Statement: Ethical Conduct for Research Involving Humans*, Article 2.2:
http://www.pre.ethics.gc.ca/eng/policy-politique/initiatives/tcps2-eptc2/chapter2-chapitre2/#ch2_en_a2.2
3. *The Tri-Council Policy Statement: Ethical Conduct for Research Involving Humans*, Article 2.3:
http://www.pre.ethics.gc.ca/eng/policy-politique/initiatives/tcps2-eptc2/chapter2-chapitre2/#ch2_en_a2.2
4. *The Tri-Council Policy Statement: Ethical Conduct for Research Involving Humans*, Article 2.4:
http://www.pre.ethics.gc.ca/eng/policy-politique/initiatives/tcps2-eptc2/chapter2-chapitre2/#ch2_en_a2.2
5. *The Tri-Council Policy Statement: Ethical Conduct for Research Involving Humans*, Article 2.5:
http://www.pre.ethics.gc.ca/eng/policy-politique/initiatives/tcps2-eptc2/chapter2-chapitre2/#ch2_en_a2.5
6. UBC Policy 89, Section 7.8.4:
<http://universitycounsel.ubc.ca/files/2012/06/policy89.pdf>

7. *The Tri-Council Policy Statement: Ethical Conduct for Research Involving Humans*, Article 2.6:
http://www.pre.ethics.gc.ca/eng/policy-politique/initiatives/tcps2-eptc2/chapter2-chapitre2/#ch2_en_a2.6

8. *UBC Policy 85*, Section 3:
<http://www.universitycounsel.ubc.ca/files/2015/08/policy85.pdf>