



Education Faculty Research Ethics Review Handbook

Guidelines for Faculty Ethics Review Committee Chairs and Members (Operating Procedures)

Preamble

This Handbook provides guidelines for the research ethics review processes and procedures undertaken by the Education Faculty Research Ethics Committee at Rhodes University. It is based on a peer-mediated ethical framework, informed by international literature, national guidelines and best practice, for planning, conducting and reporting educational research. It aims to ensure that all participants in research by students and staff are treated fairly and respectfully, that their research activities maintain high standards of ethical accountability; and that reviews proceed timeously and consistently in line with the University's Ethics Policy for Research involving Human Participants and the National Health Research Ethics Council (NHREC) Guidelines of 2015.

The Education Faculty Research Ethics Committee (EF-REC) reviews and provides ethics clearance for Low Risk studies by students and staff in the Faculty, and by external parties in association with the Faculty. It must refer all Moderate to High Risk studies to the Rhodes University Human Research Ethics Committee which is accredited with the NHREC, and which provides clearance for such studies. These and other stipulations are outlined in the Rhodes University Research Ethics Policy for Research involving Human Participants, adopted by Council in 2021 (<https://www.ru.ac.za/media/rhodesuniversity/content/ethics/documents/policydocuments/>).



“The quality of an ethics review process is determined by three things: the quality of the review; the quality of the feedback; and the quality of the process to reach consensus on the review”.

Dr H. van den Bergh, 2020

1. Quality of the Review

1.1 General Principles on which the Procedures are based

1.1.1 The quality of the review of a research ethics approval application depends on the capacity of the reviewers to make sound judgements, using consistent review procedures and taking into account the general principles and standards of ethical research, as well as the particular context of the study in which the principles must be applied. Principles do not apply in the same way in every research context, and therefore competent and nuanced scholarly judgements need to be made, as opposed to mindless ‘ticking of boxes’. Scholarly judgements would be informed by appropriate training, reading, reflection on and deliberation of decisions with others i.e. conscious deepening of expertise over time on the part of reviewers.

1.1.2 As it is easy to get a judgement on research ethics wrong, even with training and experience, more than one reviewer needs to consider an application, and wider deliberation of the set of reviews is a key principle of the NHREC Guidelines and the Faculty processes. Combining more and less experienced reviewers in reading an application is good practice, as it strengthens the less experienced reviewers’ exposure, but also brings a fresh perspective, provided the less experienced reviewers are given a full opportunity to voice and refine their insights.

1.1.3 It is further important that reviewers should not be biased in their judgements by vested interests, e.g. reviewing their own students’ applications, or by their disciplinary knowledge. A combination of ‘outsider’ perspective and close knowledge of a particular field may make for an optimal set of comments.

1.1.4 The EF-REC will operate on the assumption that educational research is strongly contextual, complex, involves people including children, and is philosophically, theoretically and methodologically diverse. The EF-REC also recognizes educational researchers as emerging or established professionals who are entitled to freedom in research and publication of results, provided they are held accountable to maintaining the highest possible ethical and professional standards.

1.1.5 The EF-REC is guided by a strong commitment to *research integrity* which Steneck (2006) defines as a *quality*: “the quality of possessing and steadfastly adhering to high moral principles or professional standards”.

1.1.5 The EF-REC takes a broad view of research ethics, acknowledging their multidimensionality. A useful perspective is offered by Guillemin and Gillam (2004) who differentiate between *procedural ethics* and *ethics in practice*. The former refers specifically to mechanisms and protocols of adherence to ensure that, to the outside world, research can be trusted and is valid. Ethics in practice pertains to day-to-day issues that researchers face when doing research, issues that are often nuanced, socially complex and unanticipated. Reviewers should give attention to both.

1.1.6 Adhering to ethical principles and protocols outlined in this document implies that researchers are responsible agents – they are aware of their *responsibility for* the research process and *responsibility to* the individuals and communities involved in that process. The researcher is not only responsible to him/herself, but the entire research process and the people inherent in that process. The significance of ethical responsibility is conveyed by Bauman (1993, p.20) who wrote:

“In so many situations in which the choice of what to do is ours and apparently ours alone, we look in vain for the firm and trusty rules which may reassure us that once we followed them, we could be sure to be in the right. We would dearly wish to shelter behind such rules (even though we know only too well that we would not feel at all comfortable were we coerced to surrender to them). It appears, however, that there are too many rules for comfort: they speak in different voices, one praising what the other condemns. They clash and contradict each other, each claiming the authority the others deny. It transpires sooner or later that following the rules, however scrupulously, does not save us from responsibility”.

1.1.7 The principles in Section 1.2 represent internationally accepted ‘standards’ for research ethics that are also outlined in the NHREC guidelines, albeit with room (in Chapter 6) for the social sciences to interpret the standards as relevant to particular disciplines and methodological frameworks. The intention is not to be stipulative, but to identify key areas for considering the ethical conduct of research in education. They are thus intended for researchers to consider when planning and doing research, and for reviewers to consider when they provide ethics approvals for research to proceed. Although the standards are listed as discrete items, they are integrally related.

1.2 Standards

1.2.1 Respect and dignity

Educational researchers should:

- respect the autonomy and welfare of participants
- protect the privacy and confidentiality of participants as needed
- respect the right of individuals to refuse to participate or withdraw from participation.

1.2.2 Transparency and honesty

Educational researchers should:

- analyse the research context for possible risk and disclose potential risks and benefits to participants (see risk level definitions in the research ethics protocol/application form)
- obtain informed consent from participants by briefing participants about the aims and implications for the research and the potential risks as the researcher perceives them
- practice the principles of honesty, reflexivity and openness to scrutiny, when communicating the research findings to the public and their peers
- NB: In cases where the methodology necessitates concealment of information, the researcher should:
 - ensure that the prospective academic, educational or applied value of the research project justifies this methodology
 - investigate alternative methodologies that do not require the concealment of information
 - ensure participants are informed of the reasons for such concealment.

1.1.3 Accountability and responsibility

Educational researchers should:

- conduct their research in accordance with these principles
- conduct their research in accordance with codes of ethics of the research contexts and relevant professional associations
- disclose any conflicts of interest
- not misuse research for personal power or gain
- pay special attention to research which includes participants who may be vulnerable (see below)
- pay attention to investigator and supervisor competence and responsibilities.

1.1.4 Integrity and academic professionalism

Educational researchers should:

- attempt to practice non-partisanship and independence, conducting research that is either free from or explicitly discloses any political, racial, gendered, religious or other bias
- ensure that the methodology of their research project is thorough and academically sound in terms of relevance and scientific integrity.

1.3 Specific Guidelines

1.31. *Voluntary informed consent*

- Voluntary informed consent requires that all the participants agree to their participation without any duress or coercion prior to the research starting.
- Researchers must inform the participants why their participation is necessary, how and when they will participate and to whom the findings will be reported.
- Researchers need to be explicitly aware of any power relations in the context of the research, that may compromise the research process.

C2. Disclosure

- Researchers must obtain written consent from the participants - this is referred to as Consent Letters and they need to be accompanied by enough information, appropriately worded, for the participant to make an informed decisions (see Appendices for examples). In some context a written document might not be appropriate and a suitable alternative must be found.
- Researchers must also obtain permission from affiliated institutions where necessary. In a school context this refers to principals and the provincial Department of Basic Education or regional office of the Ministry of Education in countries other than South Africa. In other contexts permission is not necessarily required, but a courtesy letter informing the organisation that research will be conducted, would be appropriate.
- If the participants are minors, researchers need to obtain written consent from their parents or guardians to participate in the research, and assent from the minors themselves, in a suitable format, which may or may not be written, but must be recorded.

C3. *Minors*

- A minor is a child less than 18 years old (Children’s Act 38 of 2005)
- Researchers involved with research with minors need to comply with Section 3.2.2.1 of the *Ethics in Health Research: Principles, Processes and Structure*, Department of Health, South Africa, 2015. Teachers should be professionally qualified to engage appropriately with learners and need to adhere to their professional code of conduct when children are directly or indirectly involved in their research.
- For the purpose of these guidelines, Section 3.2.2.1 also applies to individuals whose age and other vulnerable circumstances may limit the extent to which they understand their voluntary participation and role.

C4. *Right to withdraw*

- Researchers must inform the participants that they have the right to withdraw from the research at any time with or without any reasons.

C5. *Incentives*

- These need to be used sensitively and with good sense.
- Researchers must be explicit how they will mitigate against incentives creating potential bias and expectations in the research.

C6. *Privacy*

- Confidential and anonymous treatment of the participants’ data must be ensured.
- Researchers must be explicit about how and where the data will be stored.
- Researchers must seek the participants’ permission to disclose data to third parties such as conference audiences or management boards.

C7. *Sponsors*

- Researchers are expected to bring to the attention of any Sponsors the Ethical Guidelines of the Education Faculty. Sponsors are considered to be any body or person that fund research activities.
- Written research agreements with Sponsors must adhere to the Ethical Guidelines of the Faculty of Education.
- Researchers must fulfil their responsibilities to Sponsors to the highest possible standards.

C8. *Risk*

- Researchers must be conscious and explicit of the risks involved in conducting their research.
- These risks include risks to the participants, risks to the researcher and risks to the university or other institution.

C9. *Value*

- Research must have social value and be credible.

C10. *Conflict of interest*

- A conflict of interest arises when a researcher has other goals or priorities besides the research questions or aims of the research. Researchers must ensure that a conflict of interest does not compromise the validity of the research. Researchers must disclose any conflicts of interest.

Extract on Risk Levels from the EF-REC ERAS Protocol (online):

Risk can affect the participants, the researcher and/or the university. It can be affected by the research topic, the context, the participants or the chosen research methods.

LOW risk is defined as: The likelihood or magnitude of possible harm being no greater than those imposed by daily life in a stable society, including routine educational or psychological tests. OR Where the only foreseeable risk is that of inconvenience or discomfort, or where there may be some sensitivity to questions asked.



MODERATE risk is defined as: Likely risk of some harm for participants and/or the researcher, but steps can be taken to mitigate or reduce risks. Discomfort, anxiety or stress suffered by a participant. Support / counselling services and a distress protocol (what to do if harm occurs) must be in place, if appropriate.

HIGH risk is defined as: When there is a high likelihood or foreseeable risk of serious adverse consequences if not managed in a responsible manner. Examples may include sensitive topics like experience of violence or criminality; participants with multiple vulnerabilities; deception; research that puts the researcher or participants in harm's way.



PLEASE NOTE: Moderate and High Risk study applications should be completed on the Human Ethics Form and submitted to the Human Research Ethics Committee who is accredited to deal with such applications.

In Educational Research, children are not always at high risk. e.g. Risk can be low or moderate if they are part of a study by their teacher who has a good relationship with them, and the research including tests by the teacher do not constitute more than the risks inherent in normal daily activity (in this case schooling); and the teacher uses mitigation measures (e.g. debrief learners with poor results).



2. Quality of the Reviewers

2.1 Constitution of the Education Faculty Research Ethics Committee

2.1.1. Membership

The EF-REC will consist of:

- A Chair (the Dean, Deputy Dean or senior staff member nominated by the Dean and approved by the Faculty Board as a Class B Matter)
- A Deputy Chair nominated by the Dean, to deputise for the Chair when needed
- All Faculty members with a PhD degree
- Senior staff from RUMEP, CSD and ISEA involved in research and supervision, who may not necessarily have a PhD
- Any co-opted members when the need arises (without voting rights)
- The Faculty Officer provides secretariat support (agendas, minutes, operation of the online system) but does not have voting rights

The Chairperson and members are elected by the Faculty for a two year period

The Chair for 2021-2022 is Prof Eureka Rosenberg (Deputy Dean and Chair of RUREF)

The Deputy Chair for 2021-2022 is Dr Pamela Vale

In 2021-2022 the EF-REC consisted of 33 members with Dr Karen Ellery a co-opted occasional member from outside the Faculty (see Appendix 2). The Chairs of the RU-HREC other Faculty RECs, are invited to attend EF-REC meetings, and do so from time to time.

2.1.2 Appointment and Induction of Reviewers

Reviewers are appointed through an invitation from the Chair. *A formal letter indicating that reviewers are not liable for unethical research that has been approved by them, may need to be considered (to be confirmed).* The participation of doctorate staff in the EF-REC is compulsory, based on the principle of reciprocity: staff who benefit from having their own or students' applications reviewed, are expected to review applications. All reviewers need to submit their CVs to the Chair. Reviewers' CVs should be kept on record for NHREC auditing purposes, including the CVs of reviewers from outside the Faculty.

Orientation to review procedures are provided through interaction with the REC Chair, Deputy Chair and Faculty Officer, and the following documents which are available as PDF print outs and uploaded to the online review systems (ERAS) and/or the Rhodes Research Gateway: Ethics webpage:

- (i) Form / protocol for ethics applications (with risk level definitions and other guidelines)
- (ii) Posting review comments (Panel and Form comments)
- (iii) Uploading documents
- (iv) Guidelines for interpreting key ethics principles in diverse contexts
- (v) Application Manual
- (vi) Manual for Modifications

2.2.3 *Term of Office*

- Chairs are elected for a two year period, with possible re-election.
- Reviewers serve for as long as they have an academic role in the Faculty
- The Chair may not serve for more than two consecutive terms.
- The Chair will notify the Faculty Board of changes in membership
- The Chair will notify the RU-HREC of changes in chairs.

2.2.4 *Recommendations of the EF-REC*

- One-quarter of the appointed members will constitute a quorum.
- The recommendations of the committee will be carried by simple majority.
- Where a committee cannot reach agreement as to a recommendation, the Chair will request to use her judgement. If a simple majority cannot be achieved, and the members are not willing to let the Chair exercise her judgement, the application will be referred to the RU-HREC, and/or a meeting will be held with the applicant to gain further clarity.
- The EF-REC issues approvals for Low Risk research. Research with Moderate or High ethical risks are reviewed and processed by the RU-HREC. A number of members of the Education Faculty are also required to serve on the RU-HREC, to provide Educational expertise to that Committee.

2.2.5 *Terms of Reference*

- The EF-REC considers ethics approval applications for research projects by staff and post-graduate students
- They do not approve the MEd and PhD proposals; these are reviewed in the Education Faculty Higher Degrees Committee (EHDC)
- The EHDC is independent of the EF-REC, although the members are generally the same (i.e. all Faculty staff with a PhD). The Chair and Deputy Chairs of the EF-REC and the EHDC are different.
- The EHDC reviews the design and methodology of the proposed study. Reviewers may also comment on ethics aspects, but they do not approve the ethics at the EHDC.
- The EF-REC only approves student research once the research proposal has been accepted by the EHDC. The reason for this is that a sound research purpose, design and methodology are key aspect of ethical research, but the EF-REC protocols and procedures do not lend themselves to providing feedback on these as well and when Ethics Reviewers also comment on the methodology, applicants get confused as to whom is reviewing their proposal, and the ethics clearance process is delayed. The Education Faculty decided to keep these two kinds of review separate, so that each will get adequate attention, but also aligned, as they do have bearing on each other.
- In the case of staff research, which is not considered by the EHDC, the EF-REC requires a short proposal or extended abstract to be submitted with the ethics application, so that the reviewers have an adequate understanding of the proposed methodology. Proposals are submitted on ERAS as uploaded documents.

2.2 Training of Reviewers

Training should be arranged by the Chair of the REC in collaboration with the Ethics Coordinator at Rhodes. Both discipline specific and more general training is needed. Interaction with reviewers from other faculties and/or a range of departments is highly recommended as part of the ongoing development of reviewers' scholarly judgement, to avoid the development of blinkered reviews or 'blind spots' which are the other side of having close disciplinary knowledge.

The currently trained reviewers have found the interactive, rigorous, contextual ethics approach from highly experienced trainer Dr Henriette van den Bergh, valuable, and she has been contracted for training in 2020 (following training in 2019). A two day workshop has been found to be a minimum introductory level course. In addition, reviewers are encouraged to enrol for (and where possible contribute to) short courses on Ethical Dilemmas regularly offered by the Centre for Post-Graduate Studies at Rhodes University.

Certain online courses can also be recommended, although very general courses have been found to be less useful. *All reviewer training offered must be recorded and saved in the REC archives. Training records must be kept for auditing purposes.*

3. Quality of the Feedback

3.1 Online application and review system

Reviewers need to be familiar with the online system. This takes orientation and a single live training session of around one hour. It has been found to be helpful to work with a manual containing screenshots to refer to while reviewing the first few online applications (Appendix 4). The orientation of reviewers (as well as students and supervisors) is provided by the University's Ethics Coordinator and the Faculty Officer and Chair of Deputy Chair can provide Faculty specific information The Ethics Page on the Research Gateway (<https://www.ru.ac.za/researchgateway/ethics/>) should also be used.

Reviewers' frustrations with opaque and unstable online systems create an overall impression of an arbitrary, unresponsive and imposed system that dangerously and annoyingly disregards the scholarly project, and should hence be avoided at all costs. This should be addressed on at least the following fronts:

(i) The live orientation and availability of assistance mentioned above.

(ii) The online system and the ethics protocol should be aligned with the REC's understanding of research ethics; given that the latter is likely to be diverse, the system should be as open-ended as possible. That is, it should not suggest or impose certain answers or outcomes as correct.

(iii) The online system should be as user-friendly and streamlined as possible.

(ii) and (iii) above imply a streamlined online system, with just enough questions in the protocol to allow a well informed review. *By all means resist the temptations to add questions that do not have direct bearing on the ethics application.*

An online system can take on a central position of importance out of proportion to its actual relevance in advancing ethical research; the institution runs the risk of thinking of the online system as the ethics approval system. The reviewers' inputs, the meetings, and follow up interactions with applicants and supervisors, are also important parts of the process. Hence, the online system need not do absolutely everything. An even more dire risk is for the institution, reviewers or RECs to assume that all wrongs can be righted through the REC system.

The REC system is not set up to improve the quality of supervision; the quality of research design and proposals; the functioning of departments and higher degrees committees. These matters are very important and should be taken up through appropriate channels. The REC system and in particular, the online protocol, is not the place to try and right these wrongs. When we aim to do so, by adding questions and requirements to the online protocol that do not have direct bearing on the ethics clearance process, we ironically jeopardize the ethics clearance process, confuse applicants, frustrate supervisors, put pressure on throughputs and other aspects of the scholarly process, and thus reduce the chances of quality improvements.

3.2 The Protocol

The Education Faculty's research ethics protocol (Appendix 1) consists of the following question areas:

- i. Name and contact details of applicant
- ii. Name and contact details of supervisor where applicable
- iii. Name and contact details of other researchers who need to be covered by the clearance (this allows them to see comments and receive feedback directly)
- iv. Detail of other clearance that might already have been provided (e.g. from a partner institution in the case of a multi-partner research programme)
- v. Summary of study (in case of students, a full proposal *with additional ethics information* is first reviewed by the same reviewers, in the EHDC)
- vi. Indication of risk level (this committee only processes Low Risk studies; Moderate and High Risk studies are processed by the RU-HREC which requires a separate form)
- vii. Participant groups and any associated vulnerability (either of individuals or groups, under particular circumstances, i.e. vulnerability is not assumed as fixed trait always to be ascribed to certain groups such as women, children, elderly, rural people)
- viii. Methods for data collection and instruments where these can be developed beforehand, and associated ethical considerations e.g. of videography, voice recordings
- ix. Appropriate methods for obtaining and recording informed consent, assent or proxy consent where applicable
- x. Gatekeepers permission where applicable (this is not assumed to be always needed, but many educational studies take place in institutions where authorities do require that permission to undertake research in the institutions be sought)
- xi. Methods for ensuring privacy and anonymity (this too is not assumed to be always needed; in engaged, collaborative or participatory research for example, ethical conduct may be to ask participants should be given an opportunity to indicate how they would like to be acknowledged for their contributions)
- xii. Methods for keeping and safeguarding data and measures for complying with the POPI Act
- xiii. Methods for disseminating the research (in case these pose any risks)
- xiv. Sites where research will be undertaken (in case these pose any risks)
- xv. Positionality and possible vested interests of the researcher in certain outcomes

Applicants and reviewers are assisted in their decision making with information tabs in the online protocol, that expand on a question (e.g. by defining the risk level, or what is meant by vested interest). This is complemented with a Guidelines document and references to useful readings, that are available on the website (e.g. Appendix 7) and shared during research training.

3.3 Submitting an Ethics Application

- Applicants upload their (1) proposals (in the case of students) and complete their (2) ethics applications at the same time, at least two weeks before the meeting. This is done by creating a “project”.
- There is a monthly cut-off time for completing and submitting the application, so as to allow the REC to prepare for the meeting. Meeting dates are available on the website before the start of the new academic year, and applicants should plan accordingly so as not to cause avoidable delays in their projects, when they have to wait for ethics clearance.
- Ethics clearance should be done *before* the study is started. Before ethics clearance is provided, researchers may engage in research sites in the normal course of their work, but not for purposes of collecting data.

Where research programme leads or staff researchers anticipate that an area of their work may in future be amenable or important to research, they may apply for ethics clearance that would apply to the storing of the information related to this area of work (notably, curriculum activities, course deliberations, student assignments and reflections, test and examination results). Students and fellow staff could be asked to sign a general approval for data to be used, provided that anonymity would not be compromised or conversely, that such students or staff should be given the option to be named or otherwise acknowledged as sources, should they so wish.. It should be noted that guidelines about not using information that was collected for other purposes (such as blood samples drawn for therapeutic purposes) do not necessarily apply to educational research. *However, ethics clearance should be sought well ahead of the envisaged start of a research project. Only in exceptional circumstances, such as the start of a pandemic, will ethics clearance be expedited.*

- The application can be completed by the student, or supervisor, sole researcher, member of a research collective or research programme lead. The applicant should have an @ru.ac.za address.
- The person completing the application can “Share” the project/protocol/form so that more than one person can work on or review it.
- The supervisor must sign off the application to indicate that they have seen it, so as to avoid the supervisor disagreeing with what the student submitted, *after* the application has already been reviewed.
- The application and all components such as letters, should be as polished as possible (carefully deliberated, thought-through, edited and proofread) at the time it is submitted for review.
- Once an application has been reviewed, feedback should be made available to applicants as soon as possible.
- Changes may be required (either minor or major modifications).
- Changes must be made in the same “project”.
- Should it transpire that an application was erroneously developed or submitted, it can be “deleted” under the same “project” function.
- While the EHDC meeting takes place separately from the EF-REC meeting, the proposal for the EHDC is nonetheless also uploaded to ERAS for easy record-keeping and cross-referencing, and to make it easier for students to use one online system rather than two.

- Comments on the proposal are also uploaded to ERAS, using the EHDC's template for proposal feedback and not the ethics application protocol. It is important that it is clearly understood: these are two separate feedback systems.

3.4 Reviewing an Ethics Approval Application

- The EF-REC convenes once a month. Dates are set at the start of the year, to ensure that members can diarise the meetings and attend as many as possible.
- Ten days before the meeting, the Chairs of the EHDC and EF-REC meet, view the proposals and applications received, and allocate reviewers from the membership.
- Reviews are undertaken by a mix of more and less experienced reviewers; ideally reviewers have experience in the cognate discipline, methodology and educational sector
- Three reviewers are appointed for Masters studies, four reviewers for PhD studies, and two senior reviewers are appointed for staff applications.
- The same reviewers are assigned to the proposal and the ethics application, in the case of student research.
- An agenda is drawn up and review requests are sent out through the ERAS system; this provides a record of reviews, as does the Agenda. Hence ad hoc email requests not done on ERAS, should be avoided. The agenda lists the applications (with a reference number inserted); names of applicants and where appropriate their supervisors; project titles and degrees; and names of reviewers
- The agenda contains all new applications received in time, all re-submitted applications, and a record of decisions made by Chairs between meetings (approvals of Minor Modifications, e.g., or outcomes of disputes)
- Requests to review applications are sent to reviewers through ERAS. A reviewer can indicate if they are unavailable (e.g. they are on sabbatical or sick) by writing an email to the REC Chair within 24 hours of receiving the 'request to review' email. They are not expected to decline without good reason.
- Firstly, reviewers read the proposal and comment on it via the EHDC proposal template as part of their EHDC role. Only if they find the proposal (research design) broadly in order, do they proceed to the second step, which is to review the ethics application.
- The ethics review process is done directly into the online form. Reviewers individually and independently review the application and enter comments on the form; they are free to draw on collegial inputs if they believe they need to, and to readjust comments should they feel necessary but as a rule they do not engage with the researcher or supervisor at this point. Panel comments refer to individual questions and the Form comment is useful for a summative comment and recommendation.
- Reviewers are encouraged to caucus with each other ahead of the EF-REC meeting, to share their reviews with each other, discuss areas of uncertainty or disagreement, change their comments where it seems needed, and decide on who will speak to the review during the EF-REC.
- Only if they are in agreement that the proposal is broadly in order, do they proceed to discuss the ethics application. They may amend or retain different views on the application.
- Their reviews must be completed and visible to the Chair on ERAS at least one day before the REC meeting.

3.5 The EF-REC Meeting

- The day before the REC meeting the two chairs read through the applications and the review comments and consider between them, how the application should potentially be handled in the REC. They also consider re-submissions (of previously returned applications).
- On the day of the REC meeting, all chairs, assistants and reviewers attend. If members are unable to attend, they should submit an apology which should be minuted. The Chair may write to members who fail to regularly attend the EF-REC meetings.
- The Deputy Chair may stand in for the Chair when she is unable to attend; the Deputy Chair must take over Chairing when the Chair or the Chair's students applications serve before the REC.
- During the meeting, the ERAS system is made visible to all reviewers. Applications that have been passed by the EHDC are reviewed, one at a time. The project summary (abstract) is silently read by all members. Thereafter the Chair invites one of the reviewers to share the outcome of their deliberations. If the reviewers were unable to meet beforehand, the Chair reads the summary comments out loud (these are also visible to all the members) and asks the reviewers to comment. Therefore the review is opened to comment from the floor, that is, any member can raise an issue or make a recommendation. Discussions of various lengths ensue where necessary. This is also a time where the Chair raises general issues (e.g. "We seem to be asking applicants to comment 'more' on positionality but we are not specific on what is needed") that the REC can then decide how to address (e.g. we need a workshop on positionality so we can conclude what we should be expecting from applicants).
- Supervisors (or staff researchers) are encouraged to attend EF-REC meetings, so as to hear reviewer feedback directly. Once reviewers and committee members have shared their views, the Chair may allow questions or clarifications from the research or staff researcher/applicant. *Supervisors or staff applicants should under no circumstances intimidate members or the Chair into making unwarranted decisions that are not a majority view.*
- Following suitable deliberation one of the following conclusions can be reached by the REC:
 - i. Approve the ethics application
 - ii. Approve provisionally until gatekeeper permission has been submitted to the REC
 - iii. Return for minor modifications to be made to the satisfaction of the Chair and/or two or three of the original three or four reviewers
 - iv. Return for major modifications to be made to the satisfaction of the above (can be done in-between meetings)
 - v. Return for review by all reviewers and to serve again before the next REC ("resubmission")
 - vi. Refer to RU-HREC (if the research is deemed as Moderate or High Risk).
- At times where the reviews leave the committee unsure of the best way forward, the Chair calls for a meeting with the applicants (in the case of staff applications) after which an application can be revised and resubmitted, and reviewed by the chair, or the chair and reviewers, as indicated above.
- ERAS provides an automatic notification to all named applicants as to the outcome of the review. Automated outcome letters (see Appendix 8, 9) are sent to applicants (and to (co)supervisors or co-researchers they have specified in their application) using their Rhodes email addresses. Each Ethics Clearance Application is assigned a unique number by ERAS, which appears on the Approval Letter and all related correspondence generated by ERAS.

- Permission or gatekeeper letters, once obtained from relevant authorities, are emailed to the Chair and coordinator. The Chair checks the validity of the letter, sees if it is from the authorities listed in the application and for the correct project. Once all is found to be in order, the Chair can issue a full ethics approval (send to the applicant in form of a letter with project title and reference number) in the case that provisional ethics approval was granted pending receipt of gatekeeper or permission letters.

3.6 Following Review: Record keeping, Monitoring and Governance

3.6.1 Record keeping and Reporting

- The outcomes of the applications are minuted
- The Chairs and assistant prepare the minutes of the meeting (and circulate them for checking to the REC members. The REC members are given a week to find errors or misrepresentations in the minutes, and if no comments are received, then the minutes are converted into a pdf file and saved as a final document.
- The minutes (detailing only decisions) are:
 - Tabled at Education Faculty Board meetings
 - submitted to the RU Research Ethics Coordinator and HE-REC chair, and
 - stored for auditing purposes, both on ERAS and in a back-up Google Folder.

3.6.2 Reporting and Governance

- The EF-REC submits its Minutes with Recommendations made to the Faculty Board as Class B matters, and to the RU-HREC.
- Once a year the EF-REC submits a summary of its activities and decisions to the RU-HREC for reporting on to the NHREC
- The EF-REC is open to scrutiny by the NHREC and its auditors

3.6.3 Monitoring and Renewals

- It is not practical to do specific research ethics site visits (active monitoring) for all studies in the Faculty
- Passive monitoring takes place through annual renewals of ethics approvals; applicants need to apply for a renewal 12 months after clearance was issued, and indicate what changes might have taken place in the project, that affect ethics considerations
- Supervisors have a responsibility to guide novice researchers, but also cannot provide active monitoring at research sites
- In the case of B.Ed. and Honours students, course coordinators need to provide close active and passive monitoring of research activities (e.g. reflective assignments and formative evaluations)

3.7 Deliberation - its importance and role

The NHREC Guidelines (2015) require that the reviews of applications be deliberated in RECs before decisions are made. This makes considerable sense, given the judgemental nature of the ethics review process. It is unlikely that a single reviewer will always ‘get it right’; research also indicates that many research ethics decisions are open-ended in nature. Hence there is value in the Habermasian ‘communicative rationality’ i.e. deliberating among peers to a conclusion that all parties can live with even if they do not agree entirely, in the process welcoming a diversity of voices and alternative views, as long as some basics are agreed upon. If there is no agreement on basics, the deliberation process is likely to be protracted and circular, which will eventually detract from the quality of reviews and the willingness of reviewers to contribute. External inputs (e.g. by experienced leaders in the field) may assist a committee to come to agreement on basics.

The purpose of the deliberation should be made clear: It is not for a Chair or any reviewer or group of reviewers to win an argument, but to provide the best possible feedback to a researcher so as to assist them to proceed as soon as possible with an ethically sound study, and therefore to meet two broader goals: advancing the university’s scholarly project, and protecting all parties concerned from risk.

The first round of deliberations ideally take place among the reviewers themselves, ahead of the REC meeting.

The Chair of the REC views the comments from all reviewers and shares these with the other reviewers and the REC committee members during the REC meeting. The meeting then discusses the comments and comes to a conclusion about the outcome. The chair or any other member may differ with what the reviewers recommended, and the REC can provide discussion towards a conclusion. The NHREC recommends deliberation as the means for decision making, hence the need for a joint committee meeting, rather than simply individual reviews being collated and an additive decision made.

All reviewer and form comments are retained unless the REC feel their comments were inappropriate, e.g. poorly informed or mistaken, in which case they may remove them before the review is made visible to the applicant. That means both Panel and Form comments can be amended in the REC meeting; this is a key purpose of the meeting.

3.8 Relationship to Broader Research Proposal Review

The EF-REC is a separate meeting that follows the EHDC meeting. It is important that the two meetings complement each other. In particular, the Education Higher Degrees Committee must:

1. Judge the quality and appropriateness of the research project, research design, and what the NHREC calls its “scientific merit”. Studies that are not yet well enough conceptualised, or that remain poorly designed despite feedback from supervisors, should not be submitted to the REC. To review an ethics application for a poorly conceptualised / designed research project, is extremely stressful and unfair to ethics reviewers, because they do not have the means or the mandate to comment on the merit of the study, yet it understandably rankles their academic integrity to approve a study that seems to them to be poorly conceptualised. The suitable place to address the quality and relevance of research proposals is in discipline specific departmental or faculty higher degrees committees (or

similar functions) as well as on periodic teaching and learning or post-graduate reviews. Other suitable methods to address the quality of research at Rhodes include the supervision and research training offered by the Centre for Post-Graduate Studies, and Faculty initiatives such as staff development and research methodology courses for students and staff, M.Ed. and PhD weeks for students..

2. The Higher Degrees Committee should also comment on broader ethical considerations which can be shared with the committee as part of the research proposal. In the Education Faculty, students are encouraged to expand on the ethical aspects of their study (along with quality and validity measures) as part of their proposal. This highlights the fact that the streamlined online protocol is not the 'be all and end all' of research ethics, as individual studies may well have ethical dimensions that exceed 'the basics'. If the form is designed to cover all possibilities and eventualities, it becomes cumbersome and confusing, as inexperienced applicants seldom have the capacity to simply skip questions that do not apply to them.

3.9 Other Guidelines

- Applications from external parties - refer to RU Policy
- Permission for research with Rhodes staff or students - refer to RU Policy
- Applications not needing review (do not involve human participants) - refer to RU Policy
- Disputes - refer to RU Policy

4. Areas for Further Development

7. Evaluation and Improvement of SOPs
 - a. Quality Improvement
 - b. Independent Evaluation
8. Adoption and Amendment of the Standard Operating Procedures
 - a. Adoption of Standard Operating Procedures
 - b. Amending Standard Operating Procedures

REQUIREMENTS FOR AN NHEC AUDIT (2021)
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RECs membership composition

RECs appointment letters & induction materials provided to members
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Research Ethics Committee members/expert reviewers' CVs

Research Ethics Committee members/expert reviewers' training records
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REC meetings agendas and minutes

Files on projects reviewed/ approved/ declined
--

Indemnity documents

Process detail: The approval process, circulation and review of documents

Assessment of suitability of researchers and sites
--

Processes for interaction with Regulatory Authorities / other Ethics / Advisory Committees
--

Review of Suspected Unexpected Serious Adverse Reactions (SUSARs)

Process for protocol amendments

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