

Words Matter

We are grateful if uninvited guests on the lands of the Anishinaabeg, Cree, Oji-Cree, Dakota, and Dene peoples, and on the homeland of the Metis nation. We respect the Treaties that were made on these lands; we acknowledge the harms and mistakes of the past and the present; and we dedicate ourselves to move forward in the spirit of truth and reconciliation. In our empirical, conceptual and theoretical work and across all of our transdisciplinary relationships and entanglements, we embrace Indigenous ways of knowing, critical pedagogies, critical discourses and re-imagined forms of research, ethics, and institutional organizations. We stand in solidarity with all actions and alliances that disrupt systemic and institutional settler colonialism, Empire, neoliberalism, anti-Blackness, anti-Asian-ness, antisemitism, Islamophobia, anti-LGBTQ+ freedom and any number of hateful and repressive overt and covert forms of oppression.

Ethics of Institutional Analysis: Paternalism and Proprietary Access to U15 Faculty

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Rationale for Workload Creep Project

- Multi-year study into the experience of faculty with increasing workloads in the social sciences and humanities
- Study involves multiple methods: Interviews, Surveys (workload estimation and workplace mental health), and Document Analyses
- Results presented here are a combination of all three
- More information can be found at:
www.workloadcreep.ca



Rationale for the U15

- U15 = UBC, Alberta, Calgary, Saskatchewan, Manitoba, Western, UofT, McMaster, Laval, UdeMontreal, McGill, Dalhousie, Queen's, Waterloo, uOttawa
- Self-organising group of related institutions (medical/doctoral, research intensive universities) with representation across the country
- These institutions are established as regional, national, or international centres
- Disproportionate influence in the Canadian higher education landscape:
 - contribute more than \$36 billion to the Canadian economy each year
 - produce more than 70% of doctoral students
 - 46% of university students
 - receive 79% of competitively allocated research funding
 - hold 85% of Canadian university technology licences
 - hold 81 percent of Canadian university patents.



Rationale for Paper

- Paper instigated by experiences of getting ethical approval to conduct research at our home institution and then being told to seek appropriate approvals at each of the U15 institutions as well
- This required up to three months of dedicated work to secure all of these approvals

Summary of Findings

- Findings:
 - Where institutions have an Office of Institutional Analysis this created a duplication of ethical review
 - Application of relevant policies were often inconsistent with the policies themselves and with the stated purpose of the policies in practice
 - Offices of Institutional Analysis often behaved in a paternalistic manner, controlling access to university members to protect them from survey fatigue and privilege surveys for institutional purposes
 - Among faculty identifying REBs as a component of changes to their workload, it was not a substantial contribution of quantity of work, but acted as an aggravating feature that impacted quality of work



REB...

- REBs:
 - Constituted as part of compliance with Tri-Council policies related to research ethics (TCPS2, 2018b)
 - Faculty-led but increasingly bureaucratized as compliance becomes more standardised to conform to risk aversion of university administrations
 - Oversees conduct of research with all human and non-human participants

A hand holding a clear glass mug filled with a frothy coffee drink. The background is a blurred bookshelf with books of various colors (yellow, green, blue).

... vs. Offices of Institutional Analysis (OIA)

- OIA:
 - Administrative body of the university which typically has a split governance model (e.g. some faculty representation but primarily constituted by university administrators)
 - Usually limits access to research being conducted within the university community itself
 - Not universally applicable (UofM and Waterloo so far among U15)

Multijurisdictional Research in TCPS2

- Multijurisdictional research refers to the conduct of research across multiple institutions (e.g., sets out special protocols for sharing data between researchers) and acts as an exemption for REB review for research conducted at multiple member institutions (i.e., under which circumstances REB approval needs to be sought from the target institution)
 - On the FAQ related to this policy they explain the criteria where research would be exempt from further REB review (TCPS2, 2018a):
 - Research team does not include researchers from the target institution (i.e., all members of a research team are required to have relevant approvals from their institution)
 - Research does not use the resources of the institution (e.g., staff, bulletin boards, or listserv) nor use campus space for conduct of the research (e.g., needing access to dedicated offices, conference rooms, or labs)

Justifications for OIA Review

- University of Manitoba (OIA, 2018)
 - All research intended to access university members reviewed for compliance with relevant privacy laws (Manitoba FIPPA) and does not compete with institutional surveys (e.g., student satisfaction surveys) and cause “survey fatigue”
 - For non-academic surveys, will conduct a type of ethical review. Academic surveys with prior or ongoing REB approval are exempt from this duplication (in theory)
- University of Waterloo (UWS, 2019)
 - Only applicable to non-academic research
 - Research intended to recruit more than 500 members of the university community
 - Waterloo wishes to secure access to any data collected by these surveys and ensure that they comply with institutional directives/mission

Results from REB Approval Process

- REB:
 - Out of 15 Universities: 10 recognised multijurisdictional research and accepted UofM's REB process, 3 (UBC, Calgary, and Sask) required a summary review (e.g., checked that we could produce materials from our REB), 2 (Western and Laval) required full reviews of our REB materials



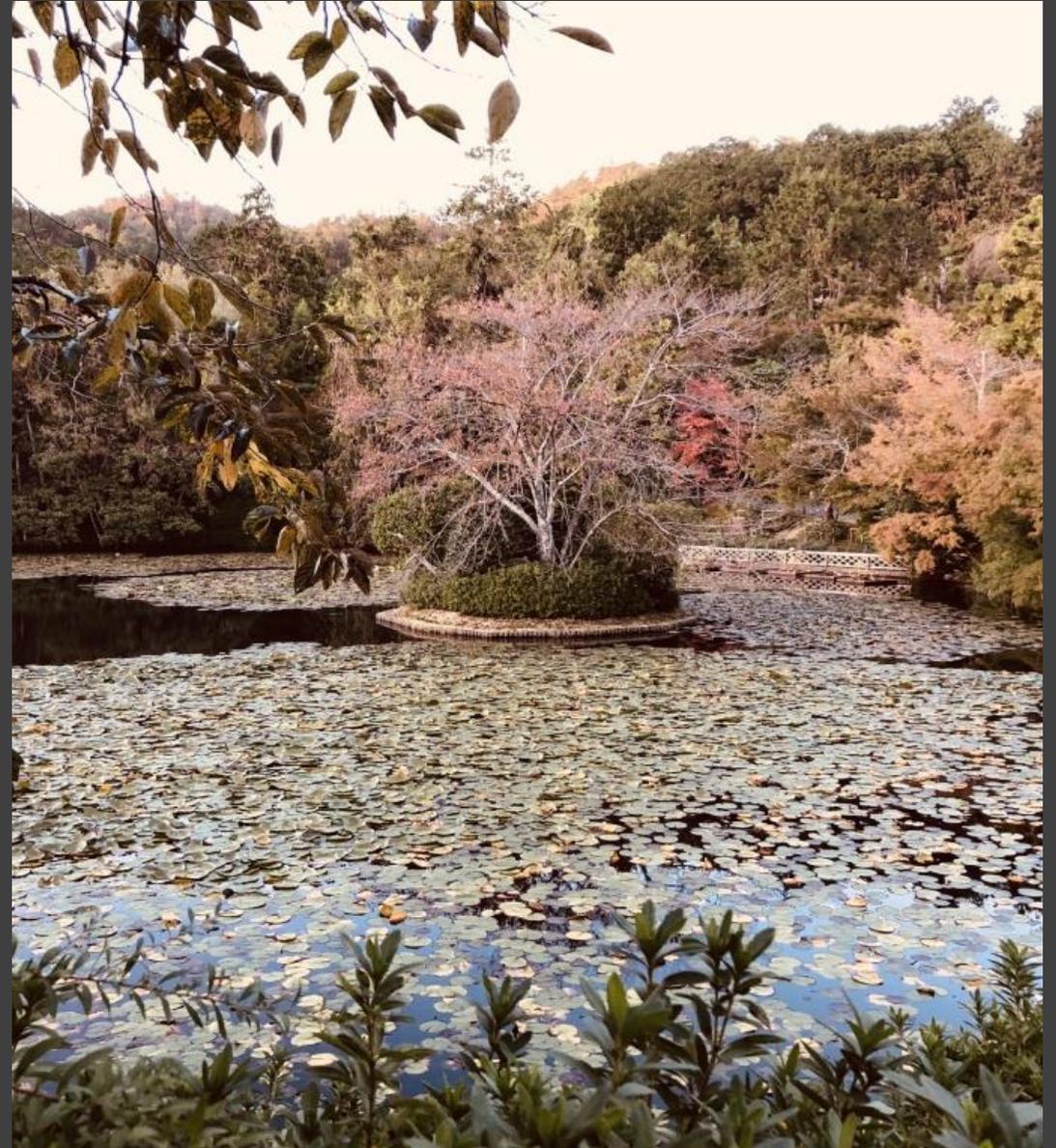


Additional Approvals

- OIA:
 - Only two (UofM and Waterloo, called Institutional Analysis and Planning (IAP)) of the institutions had an OIA which oversees research conducted at their institution, both required additional review
- Other:
 - 2 institutions (McMaster and UofT) required that Deans or VP Research approve the gathering of publicly listed emails from their university website
 - (some institutions used gmail)

Results from Survey/Interviews

- Workload estimation survey:
 - Faculty spend an average of 30 minutes/week complying with REB or OIA procedures
- Interviews:
 - Process is becoming bureaucratized (e.g., languages of compliance are being developed and then shared informally)
 - REBs are sometimes engaging in reviews of academic quality in addition to ethical reviews (i.e., REB members will comment about whether a graduate student or faculty member had interpreted a work correctly) causing additional aggravation with the process for some





Inconsistent Application of Policy

- OIA at UofM demanded compliance with FIPPA; however, FIPPA is not relevant to faculty research in Manitoba (Government of Manitoba, 2011)
- Research was academic in nature and was promoted to Waterloo's IAP and subject to further review
- Waterloo requested access to all data from their faculty, policy states that this can be provided in summary form but request was communicated to us as a demand for raw data (i.e., would contradict all relevant ethical research guidelines/principles)
- REBs sometimes requested that we receive approvals from Deans, VPs, or their own REB (see exemption for multijurisdictional research)

Implications for Education Researchers

- The establishment of additional barriers to access will make research in higher education more challenging over time
- University members are increasingly being treated as property to be managed for privileged access
 - This is informed by paternalism as university members are having access to them selectively screened out so that they may not face “survey fatigue” denying their agency to simply refuse to participate
- Creates two classes of research participant:
 - Universities rely on their legitimacy to intrude into the lives of others
 - University members are provided with additional protection from research not afforded to the wider public
 - This reinforces a well-established double standard especially in critical/decolonial studies which consider relations of power in who can opt into and out of intrusions like research
 - Again, not motivated by the best interests of their members, but protecting the university’s own privileged access to its own constituents

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