

Course-Based Research Ethics Guidelines and Application Process (2026)

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1. Purpose

Many undergraduate and graduate courses include class projects and activities designed to develop research skills. These assignments may be carried out by individual students, small groups, or the entire class. Due to recent changes in the TCPS2, more of these class projects and activities may now require ethics approval. This guidance is for University of Regina faculty/instructors who are planning to submit an ethics application for course-based research projects conducted for pedagogical purposes by students in their classes.

2. TCPS2 Review Requirements for Course-Based Research Activities

The 2018 update to the Tri-Council Policy Statement: Ethical Conduct for Research Involving Humans (released in August 2019) included a new description of course-based research activities that require research ethics review. **Given this new formulation in the TCPS2, some course assignments that have not been reviewed previously may now require research ethics review.**

“[Research requiring review] includes course-based research activities, the primary purpose of which is pedagogical, because of the possible risks to those recruited to participate in such activities, and the fact that, from their perspective, such activities may appear indistinguishable from those that meet this policy’s definition of research.”

https://ethics.gc.ca/eng/tcps2-eptc2_2018_chapter2-chapitre2.html

In March of 2021, the Secretariat released an interpretation that further clarified the requirement for ethics review of course-based research activities that were for pedagogical purposes.

“Course-based research activities intended primarily for pedagogical purposes fall within the jurisdiction of the REB (Application of Article 2.1 and Article 6.12). Such research activities are assigned to students for the purpose of teaching them how to conduct research in a structured educational context. This includes, for example, asking students to conduct interviews to collect data to be used in a course assignment, or to practice interviewing techniques. Participants in the activities may be exposed to risks (normally minimal risk) as a result of their participation, and may not distinguish these activities from others that meet the definition of research in TCPS 2.”

https://ethics.gc.ca/eng/policy-politique_interpretations_governance-gouvernance.html

Thus, many Course-Based Projects are not exempt from REB review and instructors will need to follow the process outlined in this document, including the use of one of the Course-Based Research Consent Form Templates provided by the REB. Instructors will also need to ensure that students receive appropriate training in conducting ethical research with human participants (e.g., the TCPS2 CORE certificate). While students are not submitting their individual projects to the REB, it is the instructor's responsibility to ensure that the approved processes are followed by students as with other research activities approved by the REB.

University of Regina instructors (including instructors at the Federated Colleges) must obtain ethics approval for their course assignments, if required, prior to students recruiting participants and collecting data. This ensures that the University of Regina and its federated colleges remain in compliance with the TCPS2, and that participants are respected and protected while taking part in course assignments. The review process aids the instructor to meet the following:

- The instructor has a plan for communicating ethics requirements to students and vetting the individual projects for compliance with the approved protocol.
- Students are provided with accurate recruitment and consent documents/templates.
- Appropriate recruitment and consent processes are in place.
- Risks are communicated to participants and mitigated as much as possible.
- The plan for how students will handle data security is in place.

Note that student theses and independent study projects must be submitted as individual projects via the standard REB application process.

3. Determining if a Course-Based Assignment/Project Requires Research Ethics Review

As noted above, the new definition of course-based research activities is relevant to make the determination, along with the TCPS2 definition of research (Application of Article 2.1):

The scope of this Policy is restricted to the review of the ethical conduct of research involving humans. The scope of REB review is limited to those activities defined in this Policy as "research" involving "human participants." It includes course-based research activities, the primary purpose of which is pedagogical, because of the possible risks to those recruited to participate in such activities, and the fact that, from their perspective, such activities may appear indistinguishable from those that meet this Policy's definition of research (Application of [Article 6.12](#)).

For the purposes of this Policy, "research" is defined as an undertaking intended to extend knowledge through a disciplined inquiry and/or systematic investigation. The term "disciplined inquiry" refers to an inquiry that is conducted with the expectation that the method, results, and conclusions will be able to withstand the scrutiny of the relevant research community. For example, a study seeking to explore the narratives of teens coping with mental illness would be evaluated by the established standards of studies employing similar methods, technologies and/or theoretical frameworks.

https://ethics.gc.ca/eng/tcps2-eptc2_2022_chapter2-chapitre2.html

If the course assignment fits one of the following criteria, then course-based research ethics review is required:

- Students are expected to conduct a course research project with human participants, that meets the TCPS2 definition of research (but see also **Projects Requiring Individual REB Applications** section below).
- The project does not meet the strict definition of research in the TCPS2 but includes all the elements of a research project (i.e., recruiting participants, collecting data, analysis, and reporting – if only to the class/instructor). As per the TCPS2 guidance on course-based research activities, from the participant’s perspective there is not much difference in terms of risks and other issues (e.g., consent) between participating in this type of research project and one that meets the strict definition of research. Participants could be outside of the course or students taking the course.
- The purpose of the assignment is for students to learn a data collection research skill (e.g., conduct an interview, run a survey, etc.), but the assignment does not include analysis and reporting. For participants, taking part in the data collection activity carries many of the same risks as it would if the assignment were a full research project, as outlined in the new TCPS2 guidance. Participants could be outside of the course or students taking the course.
- The purpose of the assignment is for students to practice research skills in analysis and presentation of results, but the data collection is done by the instructor from participants outside the course. Even though students are not collecting the data, persons outside the course are being recruited and providing data to the instructor and the students will be handling the participant data. For participants, taking part in the data collection activity carries many of the same risks as it would if the assignment were a full research project, as outlined in the new TCPS2 guidance.

The following types of course assignments do not require research ethics review.

- Assignments that require students to collect information from people as part of professional skill training. For example, a Kinesiology course focused on developing professional trainer skills that includes an assignment where students collect physiological data from a participant and provide them with an exercise program. Another example could be a Business course in marketing where students are partnered with a local business, provided with relevant data about the customers, and create a marketing campaign (i.e., developing entrepreneurial skills). Another example could be an Education course in which observing, recording, and assessing children’s development and learning is part of a school-based practicum placement.
- Courses where students are serving as consultants with an organization that is running an internal program evaluation/quality improvement/quality assurance study. This type of program evaluation data collection does not require REB review (Art. 2.5), so no course-based ethics review is required for projects that involve students assisting organizations with program evaluation. However, if the data were (also) being used for a research project, then ethics review would likely be required.
- Research activities where the specific data collection does not require REB review. Assignments that rely on publicly available data (Art. 2.2), that involve observation of people in a public place and are in accordance with Art. 2.3, and/or that rely on the secondary use of anonymous data (Art. 2.4). Note: In the TCPS2, “anonymous” data refers to data that **never** had identifiers associated with it. If the secondary use dataset has only been de-identified or anonymized, and is individual level data, then its use for course-

based research activities would likely require research ethics review (Art. 5.5B) Note that if data is from a prior research study in which participants' consent was obtained, the REB will need to review prior consent forms to ensure that the use of anonymous data for purposes other than the original study purposes does not contravene the original consent.

Please note that if a Letter of Exemption by the REB is required for the projects that would not require REB submission as they are exempt from REB oversight as per TCPS 2, **the REB cannot review retroactively nor provide such letters once the study is initiated**, so it is best to submit an Exemption form prior to project initiation. Some QI/QA journals request proof of exemption from REB, please email research.ethics@uregina.ca for information on the Exemption process and guidelines.

The following examples involve learning a research skill, but because they take place entirely within the class and it is not necessary for participants to provide data about themselves, the REB has determined **course-based research ethics clearance is not required for these types of assignments**.

- Assignments that involve students learning/practicing a research skill with other students in the class, but do not require students to provide real data about themselves. For example, conducting mock interviews with each other, developing a survey and having classmates look through it and provide feedback on the survey design, etc.
- Assignments where the instructor creates a dataset by surveying the class, and students practice data analysis methods with the dataset. In this type of assignment, the instructor should only collect anonymous and non-sensitive data from students and have an alternative for those who do not want to provide information about themselves (e.g., tell students to pretend they are someone else when answering the questions).

4. Distinguishing Research from Professional Skill Development

In some course situations, the information-gathering procedures and practices students are expected to use are required exclusively for pedagogic purposes. They are not conducted within the context of, or embedded within, a research framework. For example, professional faculties have students conduct interviews as part of clinical skill development. Information-gathering projects within these situations are not subject to REB review requirements. However, they must align with the appropriate professional standards or codes of conduct as well as review processes required by the relevant faculty.

Information-gathering projects or activities within a course are classified as Skill Development and do not require ethical approval where:

1. information gathered is for diagnosis, identification of appropriate interventions, or general advice for a client;
 2. information gathered is for skill development, which is considered under standard practice within a profession (e.g., observation, interviews, assessment, intervention, evaluation, auditing); and/or
 3. the information-gathering processes are part of the normal relationship where participants are known to each other (e.g., fellow classmates, friends, family)
- NOTE: Information gathered for skill development cannot be disseminated beyond the course in any form.

Information-gathering projects or activities within a course that are classified as course-based research and would require ethical approval from the REB where:

1. the intent of the activity is to educate students on research processes used to explore and expand existing theories and conceptual knowledge;
2. students compare new techniques, practices, and/or programs with standard approaches to determine which is more effective;
3. the results or findings are written in a format that would be in line with research journals or academic conference presentations; and/or
4. primary data are collected and organized for analysis and dissemination within the course structure (e.g., oral presentations to course members, written report to the course instructor).

5. Projects Requiring Individual REB Applications to be Submitted

The following types of projects may not use the course-based research ethics application and need to be submitted as individual Converis student applications using the Student Standard application or the Secondary Use of Data Student application:

- Undergraduate or graduate student theses and dissertations (Honours, Masters, PhD, Practicum, and Capstone Projects)
- Courses in which each student or each group of students conducts independent research projects
- Student activities conducted as part of an instructor's own research program
- Above minimal risk research (even if other students in the course are completing projects that fall under a course-based research ethics application)
- Projects where the primary purpose is research data collection rather than pedagogical.

6. Parameters of Risk for a Course-Based Research Application

- Projects are no more than minimal risk to the participants. As defined in the TCPS2, "[minimal risk research is] research in which the probability and magnitude of possible harms implied by participation in the research are no greater than those encountered by participants in those aspects of their everyday life that relate to the research."
- The research participants will typically be drawn from the general adult population, capable of giving free and informed consent and will not include vulnerable participants such as children, persons who are not legally competent to consent; persons with cognitive impairments requiring supported decision-making; or legal wards or persons dependent upon the researcher(s) for therapeutic care (see **Vulnerable Populations** section below for additional guidance).
- The student projects will not involve any personal, sensitive or incriminating topics or questions which could place participants at risk.
- The student projects will not change or involve behaviour(s) of participants beyond the range of "normal" classroom activity or daily life.
- The student projects will not involve physically invasive contact with the research participants, for example, taking blood or urine samples, cortisol, muscle biopsies, or tissue for genetic testing.
- The student projects will not involve deception.

If a student project falls outside ANY of these elements of risk, you and the student(s) must submit a standard student REB application through the Converis online system for review of the individual project. Given the time required for the ethics review process and the short timeline within a semester-long course, it is highly recommended that instructors craft course assignments/projects that stay within the risk parameters outlined above and are therefore covered by the course-based research application clearance.

7. Vulnerable Populations

Course projects/assignments should not include participants who may be vulnerable such as:

- children,
- institutionalized elderly,
- Persons with cognitive impairments requiring supported decision-making, or
- persons who are not able to legally consent to participate in the research.

Under special circumstances (e.g., where approvals have been obtained from facilities and project supervision arranged), course projects in some instances may receive ethics clearance to involve vulnerable populations. At minimum, the instructor will need to address the following criteria before the application will be considered for review:

1. Describe any extenuating circumstances that would justify the additional risk (e.g., student experience or expertise).
2. A strong, well-supported argument for how the population will benefit from the research.
3. A communication plan for dissemination of results to participants.
4. Evidence of community or agency support and collaboration.
5. A strong supervision plan.
6. Require all students to complete the TCPS2 CORE certificate.

Instructors who need assistance applying the above criteria to their specific course/assignment are encouraged to contact the REB office (research.ethics@uregina.ca).

8. Application Process and Instructor Responsibilities

If applying to the REB, follow the process below.

If applying to a Unit Course-Based Ethics Review Committee, please check with that unit regarding the submission process and any additional requirements to the ones below.

The course-based ethics review process is for course projects where all the students are following a similar plan for the project/assignment and the ethics review and clearance is for the course project/assignment at the course level. If students are doing independent projects that are quite unique from each other, or the project falls outside the acceptable parameters of risk for the course-based review and clearance (see below), then the student(s) would need to submit an individual student REB application for review. The REB reserves the right to request Individual REB applications where the primary aim is not pedagogical or risks to participants are higher than low risk as described in this document. For example, student projects with evaluative goals dependent on the students' ability to conduct research (e.g., Honours, Practicum, or Capstone projects) should be considered full research projects and should undergo ethics review. Similarly, projects which are on sensitive topics or involve vulnerable participants (but see **Vulnerable Populations**

section above for additional guidance), thus entailing more risk to participants, would require separate applications.

The course-based research ethics application may be used for undergraduate and graduate courses that cover research methods in the syllabus, e.g.:

- Courses offering fieldwork exercises
- Courses on a particular type of method/theory where students are given practical experience applying the methods or theory in research
- Research communication courses in which students conduct research to gain experience in writing up and presenting results
- Statistics courses in which students learn to analyze data and prepare results
- Courses in which information is collected from other students in the class

1. The instructor for the course completes and submits the Course-Based Ethics Application in Converis (if submitting to the REB vs. a Unit Course-Based Research Ethics Committee). If submitting to a Unit Course-Based Ethics Review Committee, please check their guidelines. If multiple instructors are teaching the same course and using the same project/assignment, please list all instructors.

2. The instructor uses the relevant Course-Based Ethics Consent Form template provided by the REB.

3. Applications should be submitted at least one month prior to the start of the course, to allow for the ethics review time and prevent a delay in students starting the assignment/project. For example, submit by August 1 for Fall semester courses, December 1 for Winter semester courses, April 1 for Spring / Summer semester courses. If submitting to a Unit Review Committee, please check their deadlines.

4. The application form will be reviewed by one of the REB Chairs or, if applicable, by the Unit Course-Based Research Ethics Review Committee.

5. Once the course project/assignment has ethics clearance, it is the responsibility of the instructor to vet the individual projects. The instructor should have their students submit their plans for each individual project, and review each of these proposals and supporting documents (e.g., recruitment scripts, letter of information, interview guide, etc.). The instructor ensures that the data collection plan and documents are in compliance with the approved ethics protocol and the TCPS2. Note: For some assignments, the instructor may have predetermined the same data collection process and document language for all students, and in that case the vetting of individual projects may not be necessary.

6. Human participants must be made fully aware that their participation is for the sole purpose of course-based learning on behalf of the students, and that their information will not only be de-identified or anonymized, their information will not be disseminated beyond the course in any form or format, and will be destroyed after two years (for exceptions see point 8 below).

7. If the student projects involve Indigenous (First Nations, Inuit, or Métis) communities, the instructor is required to show evidence of community engagement, research agreements where appropriate, and demonstration that projects will be carried out in a thoughtful and meaningful way. Given the timeframe of course schedules, the Instructor must demonstrate that relevant provision for policy involving research in the Indigenous context (TCPS2 Chapter 9) have been put in place before the course begins.

8. Only in very specific limited circumstances is data destruction after two years waived for data collected via course-based research. These are:

- a. when the course instructor partners with an Indigenous community and, in keeping with engaged research practices with Indigenous participants and communities, the community requests the data for their use and/or archiving purposes (e.g., audio recordings of Indigenous language speakers, stories, photos, etc.).
- b. when the course instructor partners with community-based organization(s) and not-for-profit(s) before the course starts and the specific organization asks that the data be provided to them.
- c. similar to above, when the course has a client (e.g., a person in an organization, government office, etc.) for whom a report will be prepared and the client may use the data.
- d. when the student would like to retain the data for non-research purposes such as to build their portfolio (e.g., a student in a documentary film making class who would like to retain an interview for their portfolio).

In these cases, participants must provide additional consent for retention of their data for non-research purposes by the student researcher and the participants must be provided with information on how long the data will be retained, what non-research purpose it will be used for, and how it will be securely stored.

Participants who do not provide additional consent for their data to be retained or used beyond the purposes of the course assignment for non-research purposes will have their data only used for the purposes of the course assignment and, as with all other data, will be returned to the Instructor at the end of the course for retention by the Instructor for the two year period.

Participants who do not provide additional consent for their data to be retained by the student will have their data destroyed after two years and their data will only be used for the purposes of the course assignment.

9. Unless there is a waiver of data destruction within two years and students have specific consent from participant(s) to retain their data, instructors must direct students to (a) return all data to the instructor and (b) delete all electronic records or files by the end of the course.

10. If the assignment/project will involve collecting data through another institution or agency (such as schools, hospitals, government agencies, etc.), be aware that approval from the other institution may be required prior to data collection.

11. All documents related to individual projects approved by the instructor (e.g., project proposal, letter of information, survey questions, etc.) must be retained by the instructor for a period of two years. This requirement is to ensure that the documentation is available in the event there is a participant complaint about the student project. Students must also be instructed to securely delete all data in their possession after the course is complete.

12. Ethical approval for the course-based research activity is reviewed and renewed annually via the Annual Report (TCPS2 Art.6.14). If the course is ongoing, then the instructor should renew the ethics clearance each year for up to 5 years via the Annual Report. After 5 years, a new application will need to be submitted. Other factors, such as a major change to TCPS2 requirements or the course-based application form, or a comprehensive change to the project/assignment, could result in an earlier request from the REB to submit a new application for review.

13. If there are substantive changes made to the protocol for the course-based research activity and/or any of the documents/templates students will use, then instructors must submit an Amendment form and have the changes approved by the REB prior to implementation (TCPS2 Art. 6.16).

14. The Incident Report Form should be used to report an adverse event, protocol deviation, data breach or participant complaint to the REB as soon as possible.

15. If a new instructor is taking over the course and using the same assignment, then an Amendment Request should be submitted with the new instructor's information replacing the

previous instructor in the contact section and all documents (e.g., the consent form) updated with the new instructor information.

16. Instructors should submit closure forms if courses are no longer running or being offered or if significant changes require a new Course Based Application please.

17. If you have any questions about the ethics review process or your responsibilities as an instructor overseeing a course-based research activity with human participants, please contact the REB (research.ethics@uregina.ca).

9. Information on the Application Process

Course instructors need to submit Course-Based Research Project applications on behalf of all students in the class through the Converis Course-Based Application. If the unit has their own Unit Course-Based Research Ethics Committee, their application form should have all of the sections outlined below but may also require additional information and they will have their own submission process.

Please note that the following information and documents will be required to process a Course-Based application:

- A description of the class assignment or project that students will complete, including information on the research methods to be used.
- Information on how ethics training and data security and oversight for the projects will be provided to students.

Once submitted, the application is reviewed by one of the REB Chairs or by a Unit Course-Based Research Ethics Committee. Please note that to ensure approval prior to the course start, applications should be submitted one month prior to the start of the semester in which the class will be taught. Instructors will need confirmation of application approval before students begin interacting with prospective participants for research purposes. If the review is conducted by the REB, the time to review will typically be 10 days or less but REB volume or extenuating circumstances may increase time to review occasionally. Please consult the relevant Unit Course-Based Research Ethics Committee for estimated review timelines.

Instructors must have completed the TCPS2 Core tutorial and submitted their certificate of complete to the REB prior to data collection commencing. Instructors are strongly encouraged to require their students to also complete the TCPS2 CORE tutorial before data collection begins. The TCPS2 CORE tutorial is REQUIRED for students who will be working with vulnerable populations.

10. Tips on Filling out the Converis Application Form

The Principal Investigator (PI) on the application must be the course instructor. This application may also be used for courses taught by multiple instructors (simultaneously or in rotation) using the same project/assignment. In these cases, ensure that all instructors are listed in the application as co-investigators and designate one instructor as the Principal Investigator.

For 'Title', please include "Course Project: [insert specific subtitle]" so that

it will be readily apparent to the ethics administrators during continuing review processes (i.e. renewals and amendments).

Study Sites: Include information on the site of studies, with some courses students may be conducting research outside of the U of R. Please note that if information on whether approvals from other institutions or communities will be required, this should be addressed in this section of the application. See also Section 8. Application Process and Instructor Responsibilities above if the project will involve Indigenous (First Nations, Inuit, or Métis) communities.

Risk Level: This section's responses will need to represent the risk involved in the students' projects and match the information provided in the course syllabus. With very few exceptions (see Section 7. Vulnerable Populations above), the REB requires student projects to entail low risk and vulnerability of participants must be considered in designing assignments (see guidance on research risks).

Provide the rationale for your rating, describing separately the particulars of participant vulnerability and research risk (TCPS 2 2022 Article 1.1 and Chapter 4).

Describe the purpose of the research assignment: This is to confirm that the research is for pedagogical purposes.

Method: Describe the methods students will be using to complete their projects, such as surveys, participant observation, interviews, and/or artifact and document collection. If students will have latitude to develop their specific project methods within broad parameters, you will need to describe the range of options.

Student Overview: Explain the steps the instructor(s) will take to confirm that students are following the allowable methods. Steps might include a requirement that students submit a research proposal; regular in-class debriefings; and one-on-one update meetings between student and instructor.

Instructions to students: List the "ground rules" you will require students to follow when conducting their research assignment.

If students will be developing individual projects, use this space to describe how you will review and approve them.

Research ethics in the course: Explain how you will cover the subject of research ethics in the course. Instructors are strongly encouraged to require that their students conducting course-based research with human participants complete the TCPS 2 CORE tutorial by, for example, making it a course assignment. However, if dealing with vulnerable populations, instructors must require that their students complete the TCSP2 CORE tutorial. If requiring the CORE, provide information on how you will ensure that all students in the class complete the tutorial. The tutorial is free and takes up to three hours to complete: <https://tcps2core.ca/welcome>

Data Security: Instructors are required to keep project materials (e.g., consent forms, research proposals, collected data) for a minimum of two years to assure documents are available in case of participant complaints beyond the end of the course.

Explain the data retention period and details of secure retention of the data by the Instructor or department for courses taught by Sessional Instructors. If the students will be retaining the data for other purposes (see Section 8. Application Process and Instructor Responsibilities), please provide the time period of retention, the rationale for retention, and the data storage security measures that will be taken by the students.

Specify what precautions will be taken to assure students understand the importance of data security while working on projects and appropriate destruction of data once they have completed assignments.

Attach the course outline and handouts pertaining to the research assignment/project, etc.

Attach the recruitment script, interview guide or survey, and consent form template(s) that students will use. If the description of the population, method of recruitment, purpose, and procedures are different for each student's project, provide general templates (e.g., provide both survey and/or non-survey consent templates). Please also ensure that the recruitment script and consent form(s) clearly indicate which course students are conducting the research for and that the purpose of the research is pedagogical. See the Course-Based Consent Form templates for further detail.