



EDMUND RICE EDUCATION
AUSTRALIA

EREA Research Guidelines^a

November 2021

1. Introduction

Edmund Rice Education Australia (EREA) is a national network of colleges, flexible learning schools and early learning centres that operate throughout Australia. For the purposes of this document, all references to Schools apply to all of EREA's entities.

EREA recognises that high-quality and ethical Research contributes to the national and international discourse in education. EREA values high quality, ethical Research that aims to improve the outcomes of students, staff and families in Edmund Rice school communities.

Specifically, EREA welcomes Research that:

- Supports and improves student learning, wellbeing, and engagement
- Strengthens school leader, teacher, and parent capability to support children and young peoples' learning and development
- Encourages government and community partners to reflect on and enhance their capability to better serve and lead Schools
- Seeks to engage Schools, as key stakeholders as hosts and colleagues
- Contributes to the knowledge and capacity of the broader community to enhance the outcomes of children and young people, locally and globally.

While the importance of Research is thus acknowledged, it should not unreasonably burden or interfere with the primary task of Schools to provide safe and welcoming communities of faith, learning and growth for young people. Careful consideration is therefore given by EREA and its member Schools, as determined by its Principals, to ensure that approved Research is not so intrusive as to detract from Schools' primary task.

Purpose

The two purposes of this document are:

- Definition of and information about Internal EREA Research and the principles guiding its conduct
- Definition of and guidelines applicable to External Research, how applications can be submitted to meet the requirements and expectations of the EREA governing body.

2. Definitions

Approval means the consent granted by a Principal for a Researcher to conducted Research in their School or entity.

Endorsement for Research means that the EREA Research Assessment Panel has found that the Researcher who wishes to conduct Research has met the threshold for the conduct of safe and appropriate Research in Schools. The Researcher is then at liberty to approach EREA Principals for Approval to conduct Research in their Schools.

EREA Research Assessment Panel means the individuals appointed by the EREA Executive Director from time to time to endorse or reject requests for Research to be conducted in Schools. These appointees include internal and external members.

External Research means Research conducted for individuals, agencies, bodies or research institutes external to EREA (eg for students getting higher degrees as opposed to commissioned projects). Should external researchers be engaging with students, there is an expectation they complete EREA training modules in Child Safeguarding, including the Child Safe Code of Conduct (Section 3 of the EREA Code of Conduct), prior to commencing research in an EREA school.

Internal Research means Research conducted by individuals employed within EREA and its Schools. For Internal Research, all professional conduct is regulated by the EREA Code of Conduct, the Child Safeguarding Standards, and training into which staff have been inducted. These standards apply to any Research as well as all role duties.

Principal means the head of any EREA educational entity, appointed by the EREA Executive Director to that position.

Research means all human research “with or about people, or their data or tissue... understood broadly,”¹ that is proposed to be conducted in EREA Schools.

Researcher means the individual or individuals who seek to undertake Research in EREA Schools or other entities.

Schools means any, some or all EREA educational entities.

3. Assessment of requests for Internal Research in EREA Schools

In general terms, EREA reassures itself of the compliance of proposed research designs, credentials of Researchers, and the veracity of the processes governing Researchers’ work, through the external Human Research Ethics Committees (HRECs) of Researchers’ auspicing tertiary or research institutions. HREC approvals are assured through commitment to the [National Statement](#)¹. This ensures independent assessment and approval processes are at arms-length.

EREA Internal Research may not be subject to approval by a HREC external to EREA (see Section 4 Research that does NOT require EREA Endorsement) (see Section 9 Risk).

EREA assesses the suitability of Research applications through an EREA Research Assessment Panel, appointed by the Executive Director. The Research Assessment Panel will comprise relevant personnel with at least one member with research experience, preferably in a tertiary setting. The EREA Research Assessment Panel will co-opt additional expertise according to need, eg, projects involving Research among First Nations populations.

¹ National Health and Medical Research Council, Australian Research Council, & Universities Australia. (2018). *National statement on ethical conduct in human research*. Canberra: Author. Retrieved from <https://bit.ly/3g8XS7b>

The Research Assessment Panel is guided in its assessment by the principles of the *National Statement on Ethical Conduct in Human Research* ([National Statement](#)). As the governing authority of EREA Schools, EREA also considers:

- How the research process may benefit EREA Schools, and the value of the potential research outcomes to our Schools and network
- If the demand and interruption to Schools may outweigh any potential benefit, or significantly disrupt the work of Schools (ie learning and teaching)
- The alignment (or possible misalignment) with an authentic Catholic anthropology of the human person, and EREA's strategic directions, programs and approaches to supporting its Schools
- The potential risks to our young people, staff, families, Schools and jurisdiction in the conduct of the Research, reporting of findings, and achievement of EREA' mission and strategy
- How potential risks will be prevented or minimised
- The appropriateness of conducting the Research in a School setting.

The EREA Research Assessment Panel will make a recommendation to the EREA National Executive, which will make the decision as to whether the proposed Research is approved or not approved.

4. Research that does NOT require EREA Endorsement

EREA Endorsement is NOT required:

1. From school staff undertaking Research in their own SCHOOL for the purposes of ongoing learning, reflection and improvement, and with no intention to publish the findings in the public domain.
2. Where External Research is being conducted by student researchers wishing to conduct Research as part of undergraduate study or postgraduate study at diploma, honours or masters level, their own institutions are obliged to manage the research compliance process and students may not enter EREA sites without the approval documentation from their accrediting university's HREC.
3. If the Research meets all of the following criteria:
 - a) Is appropriate for a student researcher to conduct in School/s (ie the topic is not sensitive according to Section 9 Risk, and the methodology is not intrusive)
 - b) Is 'negligible' or 'low' risk Research according to the [National Statement](#), and therefore highly unlikely to raise concerns for participants, or the school community
 - c) Is supervised by an experienced Researcher, and given ethical clearance by the relevant institution
 - d) Minimises any risk of participants being identified given the small sample sizes associated with student research.

Student researchers who meet all of the criteria above can seek Approval directly from the school Principal. However, Principals have the right to request the student seeks EREA Endorsement.

Principals', student researchers and/or supervisors can also seek EREA advice on any of these matters by contacting the EREA Research Assessment Panel via research@erea.edu.au.

5. Research that requires EREA Endorsement and Approval

Applications addressed to the EREA Research Assessment Panel to conduct Research in EREA Schools are required from:

- All non-school based Researchers
- School-based Researchers conducting Research as part of a masters-by-research, PhD or professional doctorate
- All Researchers wishing to conduct Research that is deemed higher than low risk (see Section 9 Risk for details).

An application is required even if a Researcher wishes to *promote* rather than conduct their Research through Schools — Research advertised in school communications would likely be perceived as an Endorsement. Formal EREA Endorsement is an indication to Schools that the Research is ethically sound and meets EREA requirements. Ultimately, however, the decision as to whether a School participates in Research or does not participate is entirely dependent upon Principal Approval.

6. Research involving First Nations Researchers, themes, elders and communities and Schools with significant First Nations populations

The key national guidelines by AIATSIS and the NHMRC on First Nations Research both outline that any Research involving First Nations people needs:

- First Nations governance and leadership
- A clear impact and translation plan
- Articulated tangible benefit to First Nations peoples
- Accountability to First Nations peoples.

7. Research that EREA is unlikely to Endorse

EREA may decline or request changes to applications where:

- The content of the Research proposal may raise issues contrary to an authentic Catholic anthropology of the human person or Catholic social teaching
- The potential benefits of the Research to Catholic education or the broader community are not demonstrated; or the Research is for commercial, journalistic, or marketing purposes
- Benefits of the Research are outweighed by the demands placed on participants and School resources, including excessive gathering of data beyond the immediate research objectives
- Required documentation is incomplete or inadequate
- The study method is intrusive and has the potential to stimulate distress or risk-taking behaviour, or lead participants to incriminate themselves
- The study is inappropriate for a school setting, as it does not relate to the core work of Schools and/or the methodology and instruments are more clinical in nature and require specialist support and expertise
- The Researcher lacks the experience or qualifications to conduct Research on personal or sensitive issues eg body image, mental health, family relations, sexuality
- The Researcher lacks the experience or qualifications to conduct Research on negative risk-taking behaviour (under-age drinking, illicit drug-taking, violence, stealing, suicide)
- The Research focuses on behaviour outside the experience and age range of the participants
- There is an unacceptable level of risk to participants, Schools and/or EREA
- Additional support is not provided in relation to matters that may negatively impact participants
- Confidentiality and privacy of participants is not adequately protected
- Inappropriate inducements are offered to participants or Schools

- There is a financial cost to participate in the Research
- Schools and/or participants are not provided with adequate information, and appropriate consent is not sought
- The Research is not adequately monitored by an ethics committee, and findings reported in the public domain are not subject to a peer-review process.

8. Application & documentation

Researchers must submit their application via email to research@erea.edu.au.

8.1 Principal Letter

EREA Endorsement is not an Approval, but an indication to Schools that the Research is ethically sound and meets EREA requirements. EREA Endorsement carries with it no expectation of or preference for participation. It is ultimately the Principal's Approval which determines whether their School participates in the Research or not. Principal Approval must be sought before the Research can begin or any participants are contacted. An introductory letter should be provided which clearly outlines:

- the purpose of the Research
- overall timeline
- who the participants will be and what they are expected to do (ie methods)
- time demand for each activity
- any school resources required
- how the Principal is to communicate their Approval (eg attached consent form or reply email)
- the research instruments to be used (see point 6.3)
- plain language statements
- consent forms
- and any other documents to be provided to participants.

8.2 Plain language statements

Plain language statements (PLS) should be provided for each participant type, and clearly state:

- the purpose of the Research; what the participant will be asked to do
- the time demand for each activity
- how their data and identity will be protected
- the process for withdrawing if they no longer wish to participate and/or want their data removed
- how to access follow-up support if the Research has the potential to cause discomfort.

A parent PLS is sufficient for children and young people. However, it is respectful for young people to have their own PLS, especially those in secondary school. If information statements are provided for young people, they must be written in age-appropriate language.

8.3 Instruments

All research instruments (eg surveys, interview questions, observation frameworks) should be provided with the initial research application as they form an important part of the assessment process. These instruments will be made available to Principals as required to assist them in their consent decisions.

Final versions are strongly preferred and are less likely to delay EREA Endorsement. Occasionally Researchers may not be able to provide the final instrument because it is dependent on early research findings, however an indicative draft is still required. If the research topic and method is not sensitive nor intrusive, EREA may be able to provide Endorsement on the draft versions. However, it is more likely EREA will request submission of final copies before Endorsement is issued, or that particular phase of the Research commences.

8.4 Ethics approval

Ethics committee approval from the Researcher's respective university or organisation is required before EREA will issue Endorsement. The Researcher's university or organisation will generally be expected to be listed in the [NHMRC Registry](#). Researchers may submit their application to EREA while their institution's ethics approval is still pending, however it is preferred that the research proposal and documentation submitted to EREA already incorporates ethics committee feedback.

Should the Researcher/s choose to submit to EREA and the ethics committee simultaneously, a copy of the institution's ethics approval and all revised documentation need to be submitted to EREA before Endorsement will be issued.

8.5 Language

It is expected that all documentation will have been proofread and edited before submission. EREA will not provide editing feedback, unless the information is confusing or misleading to Schools or participants.

8.6 Assessment process

The assessment process can take up to six weeks once a completed application has been submitted. The timeline can be shorter or longer depending on the complexity and sensitivity of the Research; how quickly the Researcher/s can respond to feedback and amendment requests; and the volume of EREA applications at the time.

All applications are assessed initially by the EREA Research Assessment Panel. This panel will make a recommendation to the EREA National Executive, who will make a decision on the Research. Applicants will subsequently be notified of EREA's decision to Endorse or not Endorse the research application. The reason/s for declining the application will be clearly communicated to Researchers via email. EREA Endorsement is not Approval to commence Research, but an indication to Schools that the Research is ethically sound and meets EREA requirements. It is ultimately a Principal's decision to Approve whether their School participates in the Research or not.

8.7 Withdrawal

Researchers may wish to withdraw their application if they no longer need EREA Endorsement or Principal Approval or if they are unable to meet EREA requirements outlined during the assessment process. This can be actioned by the Researcher by sending an email to research@erea.edu.au. EREA can also withdraw an application if Researchers do not respond to clarifications or change requests within six months of submission.

8.8 Research register

EREA reserves the right to record all research applications, and its assessments of and decision about them, in its Research Register.

8.9 Approaching Schools

Once an application is approved, Researchers can approach Principals in EREA Schools inviting them to participate. Principals then decide whether the Research will add value to their school community and give informed consent. Principal consent must be granted before the Research can begin or any participant is approached.

8.10 Amendments

If Researchers wish to make changes to their application, either before or after it has been approved, they are required to email research@erea.edu.au with the research title; name of the principal Researcher; clear details of the amendments; and copies of any changed documentation.

For major modifications, or if the application is more than three years old, Researchers will be asked to submit a new application.

8.11 Final report

It is a condition of EREA Endorsement that Researchers submit a summary of their research findings to EREA and participating Schools at the conclusion of their study. The final report should include:

- The title of the Research
- The name of the principal Researcher and their organisation or institution
- A summary/abstract of the Research
- The rationale for the Research and how it sought to add value to education
- The research questions and hypotheses that were explored
- A brief outline of the research design and methodology
- Findings in relation to the research questions
- Implications of the findings for Schools and the broader education community.

8.11 Engagement with EREA Research Seminars

Researchers may also be asked to contribute to EREA research seminars or the like, that may be held from time to time and to which they may be invited, for the purposes of sharing research either completed or work in progress.

9. Risk

9.1 Negligible risk

Negligible risk Research is defined in the [National Statement](#) as “research in which there is no foreseeable risk of harm or discomfort; and any foreseeable risk is no more than inconvenience.”

9.2 Low risk

Low risk Research is one level higher than negligible risk Research. Low risk Research is defined in the [National Statement](#) as “research in which the only foreseeable risk is one of discomfort.”

The following topics are greater than low risk and must be managed appropriately if EREA Endorsement and subsequent Principal Approval is granted:

- body image, eating disorders, psychological disorders, depression, anxiety, self-harm, suicide
- sexuality, gender identity, sexual behaviour

- sensitive cultural issues, race, ethnic identity, religious beliefs or world views
- gambling, alcohol use, illicit drug use, criminal activity or anti-social behaviour
- disease or health issues (mental, physical or social)
- fertility, pregnancy, parenting (including children and young people's attitudes towards parenting).

A research project may also be deemed greater than low risk if the methodology is intrusive (either physically or emotionally), and if vulnerable participants are being recruited. By definition, all young people in EREA Flexi Schools are considered to be particularly vulnerable participants.

If Researchers wish to conduct Research in Schools that is deemed greater than low risk, they must demonstrate:

- they have the necessary qualifications and experience to manage the research project
- they are aware of relevant ethical and legal obligations
- how potential risks will be managed without placing too much burden on the School
- how referral and follow up support will be provided if required by a participant
- how the School will be supported should the Research reveal concerning findings
- the project has been reviewed and approved by an HREC.

9.3 Duty of care

The safety and wellbeing of young people is paramount. If researchers wish to conduct any research activity on school grounds, they must present a valid Working with Children Check (from any Australian State or Territory) to the school Principal before the Research can commence.

If the Research involves face-to-face interaction with young people (eg interviews, focus groups, testing), such activities must take place in the presence of a teacher or other adult with legal duty of care, or in an open space in view of school staff. If at any time during a research project, a Researcher identifies that a student may be at risk of harm, the Researcher must report this information, including the identity of the student, to the Principal.

10. Consent

10.1 Assent

As most school students are minors, they are not of legal age to give consent to Research. Nonetheless, in keeping with EREA's commitment to the safety of all young people in its Schools, assent should not be assumed, and the rights and dignity of all young people must be respected. A young person must always have the right not to engage as a research participant, no matter what the nature of the Research. Apposite to the assent of young people to Research is the formal consent of their parent(s) or guardian(s) to be research participants. When Research involves the participation of young people, consent must be provided by their parent/guardian, in addition to the assent of the young person.

11 Active Consent

Active consent is the usual form of consent that is expected for Research in EREA Schools in all but exceptional circumstances. Written consent is the most usual form in which consent is provided. Consent should be sought for each participant type, clearly outlining the components of the Research that the participant is consenting to. Avoid bundling consent wherever possible, so participants have the option of saying yes or no to a particular element they might be uncomfortable

with (eg being video recorded, having their height and weight measured or their data being used in future Research).

12 Passive Consent

Passive consent refers to an 'opt-out' model of consent — following full disclosure of the nature and scope of the Research. As most young people of school-age are minors, the consent of their parents or guardians is also necessary. It may be, in instances of Research which is of negligible or low risk, acceptable that parental consent is passive, but the acceptability of this will be assessed on a case-by-case basis. Passive consent will only be approved if the following elements of the proposed Research have been fully disclosed to parents and guardians:

- the aims of the Research
- who will be undertaking it
- who is being asked to participate
- what kind of information is being sought
- how much of participants' time is required
- that participation in the Research is voluntary
- who will have access to the data once it is collected
- how the anonymity of participants will be preserved
- that participants have the right to withdraw from the research study at any time.

In exceptional circumstances, assessment of the validity of passive consent will be guided by size of the desired sample for research validity, and the practicality of gaining active consent, including the:

- significance of the Research and the likely interest in the findings from Schools and the public
- sensitivity of the Research, and whether parents could reasonably object to their child's participation
- methodology of the Research and whether the data collected will be personal, sensitive and/or identifiable
- degree of risk or harm to participants, the School and/or EREA if parents/guardians believe they were not adequately informed or had sufficient opportunity to 'opt-out'
- maturity and/or vulnerability of participants and whether their assent/consent alone would be suitable.
- On the rare occasion passive consent is approved, Researchers must:
- confirm with participating school Principals that they are comfortable with a passive consent process
- ensure parent information and consent forms very clearly state and highlight it is a passive/opt-out consent process (eg bold relevant text, put consent information in a shaded box)
- work with the participating Schools to ensure multiple communications are sent to parents, and adequate time is given for parents/carers to ask questions and/or opt-out.

11. Confidentiality and privacy

Researchers must comply with the [Privacy Act 1988, Commonwealth](#), and protect the privacy, confidentiality and, where possible, anonymity of participants, in the collection and storage of data.

If anonymity is not possible or guaranteed (due to audio or video taping participants, small sample size, collecting identifying information for longitudinal studies, tracking and data-linking purposes), participants must be informed of this and confidentiality assured. Individual participants and Schools must not be named in any reporting of research findings, unless explicit consent has been given.

Data should only be used for the purpose for which it was collected, and if Researchers wish to use de-identified data in future ethically-approved Research, they must seek active consent from participants. Researchers need to outline in their application and information to Schools and participants:

- How they will ensure confidentiality in the collection, analysis and storage of data, and in the reporting of research findings
- Adequate processes for the secure storage of and access to data
- Justification for any limitations to confidentiality and anonymity.

^a The EREA Research Guidelines heavily draw on Melbourne Archdiocese Catholic Schools (MACS). (2021). *Researchers in Catholic schools and access to data on Catholic schools* [Appendix 1: MACS requirements for seeking approval and conducting research]. Melbourne: MACS. Retrieved from <https://bit.ly/3sozUtx> and its relevance as a source document here is acknowledged.