



CATHOLIC EDUCATION
WESTERN AUSTRALIA

**GUIDELINES AND PRINCIPLES FOR RESEARCH IN WESTERN
AUSTRALIAN CATHOLIC SCHOOLS AND OFFICES**

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1.0 RATIONALE

This policy addresses the key considerations when using Western Australian Catholic Schools and Catholic Education Western Australia (CEWA) in any research project. Access to Catholic schools and CEWA for the purposes of research occurs through the Executive Director, Catholic Education in Western Australia and must conform to the underlying principles of the Mandate of the Catholic Bishops of Western Australia.

The National Statement on Ethical Conduct in Human Research 2007; Updated 2018 (National Statement) underpins all research projects that are reviewed by CEWA. This document, among others, emphasises that institutions have responsibilities for “the quality, safety and ethical acceptability of research that they sponsor or permit to be carried out under their auspices” (pg 4).¹

The importance of undertaking research is acknowledged in the Bishops’ Mandate where it is noted that it is important to “commission, conduct and cooperate in research projects judged to be of value to Catholic education” (Bishops’ Mandate, paragraph 1.166, page 52).

CEWA also recognises the importance of research which can be used to inform policy making in schools and their community. The value of collaborative networks is also recognised.

A key consideration for any research which is undertaken in Catholic schools is the wellbeing of children and the need to protect them from any potential physical or psychological harm. Any research undertaken in schools must therefore not breach the duty of care obligations of the school to its students as well as the wellbeing of staff and smooth running of the school.

2.0 DEFINITIONS

Research refers to any structured and systematic collection of information either from primary sources (students, teachers, principals, parents, others) or secondary sources (data and/or information held by the school or by CEWA). It includes information collected at the school site or through on-line, postal, tape, video or other audio taping collection – see National Statement. Pg 8 for a more detailed definition.

Mandate refers to the Mandate, Mandate Letter, Terms of Reference and Membership of the Catholic Education Commission of Western Australia (CECWA) developed by the Bishops of Western Australia, which reaffirms the importance of Catholic schools for the Church's mission in Western Australia:

<https://www.cewa.edu.au/publication/bishops-mandate-2009-2015/>

CECWA refers to the Catholic Education Commission of Western Australia, the overarching governance body which sets policies for all Catholic schools in Western Australia.

CEWA refers to Catholic Education Western Australia including the Leederville office and the regional offices of Broome, Bunbury and Geraldton and the 163 schools in the system

CEWA Code of Ethical Conduct refers to Christian ethical conduct which strives to develop and live out relationships in a manner that is based on Gospel values. All are called upon to act in a manner that is: based on Christian ethics, professional, timely and contextually appropriate: [CEWA Code of Ethical Conduct](#)

Executive Director is the Executive Director of Catholic Education in Western Australia.

HREC refers to a Human Research Ethics Committee (HREC) which is accredited by the National Health and Medical Research Council. These committees are constituted under the National .Statement and governed by the following guidelines - [National Statement on Ethical Conduct in Human Research \(2007\) - Updated 2018](#). HREC approval is necessary before the CEWA research review process can commence. CEWA is not a registered HREC.

National Statement refers to the National Statement on Ethical Conduct in Human Research (2007; Updated 2018)). This document sets out the standards for ethical conduct in human research. The N.S. can be located at [National Statement on Ethical Conduct in Human Research \(2007\) - Updated 2018](#)

Researcher's institution refers to the education or training institution; business (private or otherwise); state or Australian Government Department; incorporated body; not for profit organisation or any legal entity.

CEWA Research Review Panel is the group responsible for considering research proposals and recommending acceptance (or otherwise) to the Executive Director.

3.0 SCOPE

This policy applies to all Catholic schools and regional offices across the four dioceses in Western Australia.

This policy does not apply to the wider Catholic Church and its various agencies and parishes. Separate representations would need to be made to those agencies.

4.0 PRINCIPLES

The following principles outline expectations regarding research in Catholic schools and provide guidance in terms of how applications will be assessed.

Research needs to be of sufficient quality and conform to the National Statement - approval from an accredited HREC is essential before approval can be provided from CEWA. If the researcher's institution does not have an accredited HREC, it is the researcher's responsibility to ensure that approval is obtained from another accredited HREC, prior to applying to CEWA for approval. Any more than minor changes to the research design and methodology that occur after HREC approval need to be redirected to that HREC for review and new approval.

Research must not transgress any relevant legislative requirements and system policies and procedures which apply to schools. Some of the relevant acts and policies are listed in Appendix I. Research cannot be engaged in any illegal activity or which may encourage an illegal activity or potentially lead students or staff to unreasonably incriminate themselves.

Research must have clear links to benefits for students and schools – this may include the specific school and its students or education and children more generally. Research that cannot establish such links may not be approved. For example, research regarding broader child health that does not have relevant links to the child's life and schooling may be problematic. Researchers will be required to indicate how the research is relevant and important to schools.

Research must not adversely affect the wellbeing of students – this includes their physical, psychological, social, emotional and spiritual wellbeing either short or long term, or directly or indirectly. The assessment of risk and potential harm to students is governed by a number of legal and regulatory obligations which are mentioned later. This means that any assessment of risk and potential harm will be cautious with high levels of disclosure, and in most cases active consent from parents, will be required.

Research must be appropriate and needs-sensitive where culturally and linguistically diverse (CALD) groups are involved - this includes communication and research processes which are appropriate to both students as well as their parents in terms of providing information to seek informed consent.

Research must not be inconsistent with the teachings of the Catholic Church – broad subjects and individual research items which are deemed not to be in keeping with the teachings of the Catholic Church will not be approved. Researchers are advised to contact CEWA before preparing a research proposal if they have any doubt.

Research should not be overly burdensome for schools – schools are approached by a significant number of researchers each year. While every research submission is judged on its merits, an overall consideration for the Catholic system is to assist in protecting schools from overly burdensome applications unless clear educational value is evident. Lower quality, burdensome and costly research applications may be refused under this principle.

Research requested by commercial organisations that have as their aim to profit or financially gain solely for that organisation (including marketing purposes) will normally not be approved within Catholic schools.

The Executive Director (or nominated delegate) has overarching responsibility for approval of research that involves Catholic schools, staff, parents and/or students. No final approval shall be sought from a Principal before CEWA provides written approval. While researchers may approach a Principal to gauge interest, they must not seek final approval nor commence research prior to receiving approval from the Executive Director.

The school principal (or equivalent) has final discretion as to whether to participate in research regardless of whether approval has been granted by the Executive Director. They will exercise their discretion in terms of value, risk, cost, burden and any other matters they consider to be relevant to their school context.

Research will conform to all relevant disclosure and non-disclosure requirements including protecting the privacy and confidentiality of personal information collected during research. Instances where confidential information obtained through research may need to be revealed include reporting under the CECWA Policy Statement 2-D3 Child Abuse and CECWA Child Protection Procedures, or where researchers are legally required to disclose information. Such disclosures override confidentiality and privacy considerations.

5.0 PARTICIPATION IN RESEARCH

5.1 Definitions of research

The National Statement (page 7) indicates that human research should be considered broadly, and includes;

- Taking part in surveys, interviews or focus groups
- Undergoing psychological, physiological or medical testing or treatment
- Being observed by researchers
- Researchers accessing individually identifiable, re-identifiable or non-identifiable forms as part of an existing published or unpublished source or database

While not necessarily classified as research, CEWA receives requests from individuals and organisation to use materials produced by schools and students. These requests are covered by copyright legislation and therefore subject to the requisite approvals

5.2 Research that may not need a full application

There may be instances where the approval process required by CEWA does not involve the submission of a full Research Application. Instances might include;

- day to day classroom activities;
- undergraduate student assignments (below Honours level) where they are confined to one site (except where the Principal and/or supervising teacher deems that the questions may involve excessive intrusion on participants and/or where research may be in conflict with teachings of the Catholic Church, in which case this policy applies).
- Mandatory data and information provision to government agencies, where such provision has been required by CEWA as part of normal accountability/reporting procedures.
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- Surveys or similar conducted by the school for their own purposes in order to gather feedback from their students, teachers or wider community e.g. satisfaction survey of parents. Where the research is commissioned by the school, the principles outlined above should be adhered to. Liaison with CEWA is recommended for commissioned research.

Researchers should make contact with CEWA if they are in doubt about the status of their proposed research.

5.3 Cohort Participation

Participation in human research is outlined in the National Statement. (page 8). The CEWA Research Application Form contains a checklist of categories of students and families which may be involved in research. This assists in the assessment of risk and the appropriateness of the proposed methodologies.

Some research will focus on a particular category of student, school type or geolocation.

Where the research proposes to canvas an eclectic cohort of students, CEWA

would expect, as part of inclusivity considerations, that no specific category would be excluded. If there is an intent to exclude a particular category of student, the application must provide a rationale for this sampling.

5.4 School Participation

Most research involving schools will seek cross-system representation to ensure sampling is not unduly biased. CEWA has an expectation that where research is cross-system, the proportion of CEWA schools does not exceed 30% of the total. This limitation applies in response to school principals' requests to limit unnecessary burden.

Should researchers require variations to this requirement, explicit details should be provided that justify over-representation of CEWA schools compared with government and independent schools.

6.0 SCHOOL OPERATIONAL CONTEXTS

It is important for researchers to understand some of the key operational contexts in schools, as these have an important impact on the assessment of risk and the consent process. Four key contexts are;

- **Duty of care** – the school principal owes, on behalf of the parents, a duty of care to all students. This requires the principal to provide a safe and supportive environment for students in all activities related to the school. Duty of care cannot be delegated to a third party and applies to a range of school-related activities outside the school premises. Research approved by the principal and conducted by the researcher outside the school requires that a duty of care will be assured by the school; this will impact on risk assessment.
- **Contract of enrolment** – a contract of enrolment exists between the parents and the school on behalf of the student. The school agrees to provide a quality education, care and wellbeing and the parent agrees that their child will abide by school regulations. This contract requires that the school keeps the parents informed as far as possible, including students' involvement in research.
- **School-community relationship** – all schools strive to maximize the connection between the school and the wider parent community. This is based on trust and respect and is enhanced by communication. These connections are most important in rural and remote communities. This connection impacts directly on levels of disclosure and consent processes in research.
- **CECWA and regulatory frameworks** – as indicated in Appendix I, schools adhere to CECWA policies as well as their own policies and procedures which elaborate on CECWA policies. Further, schools adhere to government legislation and the System Agreement. Many of these policies impact on research methodologies.

7.0 RISK FOR STUDENTS AND THE APPROVAL PROCESS

7.1 Risk assessment

An assessment of the research in terms of the potential to lead to harm, discomfort or inconvenience to students is an important part of the research approval process. While the National Statement provides extensive detail on balancing risk against potential benefits of the research, where students are involved, a very

conservative approach will be taken by CEWA. This includes consideration of the age, cultural background, education capability and the existence of any learning or other background conditions.

Principals of schools are required to provide a non-delegable duty of care to students on behalf of their parents/caregivers. Where this cannot be guaranteed, research will not be approved. This duty of care applies to students undertaking research at the school as well as out of the school (including at their home) if the school has sanctioned the research.

In the case of research which has the potential to cause inconvenience or discomfort only to students, risk will typically be classified as “low to negligible”. Assessments will focus on the nature, duration and extent of discomfort or inconvenience and the student cohort involved. While a considerable amount of research will involve a low or negligible risk, researchers must nevertheless gauge this risk and outline strategies they will implement to minimise this risk. The resources of the school should not be the main source of planning for risk minimisation.

7.2 Potential higher risk or harm

In the case of potential harm to students, the interests of the child will be paramount in any assessment of an application. Harm includes physical, psychological, social, economic and legal. As well as potential or isolated personal harm, the possibility of contagion is also a major consideration. Overall assessments will consider the likelihood, severity and consequences of potential harm.

Higher risk research topics include those associated with:

- Drug or alcohol consumption
- Anti-social behaviour
- Trauma
- Self-harm and depression
- Eating disorders
- Sensitive personal and emotional issues
- Sexuality
- Criminal activity or incrimination

Research methodologies are also considered in the approval process. Those that involve the following methods are unlikely to be approved without appropriate justification and a demonstration of a high level of expertise from the researcher in terms of their capacity to manage the risk:

- Passive consent from parents
- Deception (where the intended or unintended outcomes of the research are not fully disclosed)
- Medical or any intrusive procedures
- Use of unfamiliar and dangerous equipment, especially outside the school and not supervised
- Where inadequate support provided by the researcher where risk is higher
- such that the school’s provision of a duty of care is compromised

7.3 Research outside school setting

Research is sometimes conducted outside the school setting. For example, some

research methodologies involve the school promoting the research to parents and students and the researchers(s) making contact with the parents (or vice versa) to conduct the research on line or in the parent's home. By supporting the research and promoting it to parents, the principal must still accept responsibility for providing a duty of care which cannot be delegated to the researcher or a third party. Where a research topic involves potential harm, it is often very difficult to provide the necessary level of care when not undertaken in the school. In these circumstances, researchers will need to demonstrate substantively how they will support students. Research conducted outside the school setting is subjected to the same level of scrutiny as research conducted in the school and the school has an equivalent duty of care.

8.0 CONSENT IN RESEARCH

8.1 Key considerations

In terms of the type of consent that would normally be approved, there are two key considerations;

- **Autonomy** - the principle for research projects is that consent should be voluntary. That is, it should be based on sufficient information and adequate understanding of the proposed research and its implications to enable a person's voluntary consent. Information documentation needs to be sufficiently detailed to enable participants – particularly parents – to make an informed decision. Some communities, particularly where language issues may exist, will often require additional processes to ensure appropriate understanding.
- **Risk** - this has been elaborated in Section 7.0. The assessment of risk, while broadly defined by the National Statement must also be contextualised in the operating parameters of schools as outlined in Section 6.0. This means that assessments will be conservative.

8.2 Consent

Given the contexts discussed above, CEWA will normally only approve research which involves Active Consent (opt-in) consent procedures in research methodologies. Passive Consent (opt-out) consent procedures will not normally be approved except in very low risk projects as outlined on page 7. Researchers are advised to contact CEWA before submitting their proposal to their HREC, if they are intending not to use Active/opt-in consent.

9.0 OTHER CONSIDERATIONS

9.1 Competing Interests

In the case of the researcher having a dependency relationship or conflict of interest with the participants (e.g. a relationship such as teacher-student, line-manager-staff, employer-employee), CEWA may request additional safeguards (including assistance of a third party) to be implemented.

Potential competing interests need to be brought to the attention of the researcher's HREC as well as in the application to CEWA.

9.2 Participation, Data Withdrawal, Privacy and Confidentiality

Researchers must comply with the National Statement regarding participation and data withdrawal (National Statement. 2.2 and 2.3).

Researchers must also comply with the National Statement regarding Privacy and Confidentiality (National Statement. 1.11).

APPENDIX I – RELEVANT LEGISLATION AND CECWA POLICIES

Relevant Legislation or Authority

The following Acts will apply to research activities within schools:

Working With Children (Criminal Record Checking) Act 2004

Freedom of Information Act 1992

Occupational Health and Safety Act 1984

School Education Act 1999

Vocational Education and Training Act 1996

Volunteers (Protection from Liability) Act 2002

Child Care Services Act 2007

Privacy Act 1988

Related CECWA Policies:

Bishop's Mandate 2009-2015

Catholic Education Western Australia Code of Ethical Conduct

Intellectual Property Guidelines

Selection of Appropriate Texts in Catholic Schools

Curriculum

Gender Equity

Religious Education

Dispute and Complaint Resolution

Harassment, Discrimination and Bullying

Smoke Free Schools

Aboriginal Education

Child Protection

Early Childhood Education

Occupational Safety and Health in Schools

Management of Confidential Information in Dealing with Bullying, Harassment,

Aggression and Violence (Students)

Healthy Food and Drink Choices

REFERENCES

¹ *National Statement on Ethical Conduct in Human Research 2007; 2018 Update*

RELATED DOCUMENTS

Research conducted on Department of Education and Training sites by external parties (<http://det.wa.edu.au/policies/detcms/policy-planning-and-accountability/policies-framework/policies/research-conducted-on-department-of-education-sites-by-external-parties.en?oid=au.edu.wa.det.cms.contenttypes.Policy-id-3967843>)